



NATIONAL SERVICE RESORT AND COUNTRY CLUB

WHISTLEBLOWING POLICY

OBJECTIVE

1 NSRCC is committed to a high standard of compliance with accounting, financial reporting, internal controls and audit requirements and any applicable laws and regulations. In line with this commitment, this policy aims to provide a framework and standard procedure to allow employees and external parties to report wrongful practices that they have observed in the Club for the respective authorities' investigation/discretion.

2 While the Policy is meant to protect whistleblowers who genuinely make the report in good faith, it strictly prohibits any allegation made frivolously, maliciously, and/or for personal gain. Employees, found making such allegations, shall be subject to disciplinary action in accordance to the Human Resource Policy.

SCOPE

3 This policy shall apply to all employees and external parties who have business relationships with NSRCC. These parties include members, guests, vendors, contractors, and the general public. Parties can report on possible improprieties in matters as listed under "Reportable Incidents" on Item 5 in this Policy.

4 This policy does not serve as a channel for taking up personnel grievances and appeals.

REPORTABLE INCIDENTS

5 Below is a list of examples (not exhaustive) of reportable incidents covered by this policy:

- Concerns about NSRCC's accounting, internal controls or auditing matters;
- Impropriety, corruption, acts of fraud, theft and misuse of NSRCC properties, assets or resources;
- Conduct which is an offence or breach of law;
- Serious conflict of interest without disclosure;
- Any other serious improper or unethical conduct that may cause financial or non-financial loss to NSRCC or damage its reputation;
- Participation in or condoning a reportable wrongdoing through wilful suppression or concealment of any wrongdoing or inappropriate conduct;

6 Any party is expected to report a wrongdoing if he/she has sufficient ground to believe that a wrongdoing has been committed.

7 All concerns should be raised in writing, either in the form of a letter or email. All critical information is essential for NSRCC to effectively evaluate and investigate a complaint. As such, the report should provide specific details, setting out the background and history of events, as well as the reason(s) for concern.

8 Assessment of the concern or information shall be made with due consideration given to the following factors:



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- Seriousness of the issue raised;
- Credibility of the concern or information; and
- Available sources for verification of such concern / information

9 All disclosures will be treated with utmost confidence and every effort will be made not to reveal the identity of the reporting party, as far as feasible and permissible.

PROCEDURES

10 Concerns may be raised with or information provided to:

Receiving officer: Senior Executive, Internal Audit
Address: 10 Changi Coast Walk, Singapore 499739
Email: whistleblow@nsrcc.com.sg

11 Reportable incidents defined by this policy will be reported to the Audit Committee, copied to GM, NSRCC.

12 Further information may be sought from the whistleblower during the course of the investigation. NSRCC reserves the right to refer any concerns or complaints to appropriate external regulatory authorities.

13 In the case where an employee is already the subject of disciplinary, investigation or performance review process or other involuntary procedures, these procedures will not be terminated or suspended solely on account of him/her making a report of any wrongdoing.

14 Employees are not allowed to make unauthorized disclosures to external parties on matters internal to NSRCC.

15 When the investigation is completed and NSRCC determines that a violation has occurred or the allegations are substantiated, appropriate disciplinary action will be taken.

16 The investigating officer will report the findings of reportable incidents to the Audit Committee.

POLICY REVIEW

17 This policy shall be reviewed periodically, to ensure relevance and compliance with applicable laws and regulations, as well as the Club's Bye-Laws.