

# Whistleblower Policy

## Compassion International (Singapore) Limited

### INTRODUCTION

1. Compassion International Singapore Limited (CSG) is committed to a culture of good commercial practice and highly ethical behaviour. This policy sets out CSGs approach to whistleblower complaints that seek to address suspected impropriety or wrongdoing.

### PURPOSE & SCOPE

2. This Policy aims to: establish a trusted avenue for directors, members, employees, clients, vendors and other stakeholders to report serious wrongdoings or concerns without fear of reprisals when whistleblowing in good faith; ensure arrangements are in place to facilitate independent investigation of the reported concern and that appropriate follow-up actions will be taken; and encourage directors, members and employees to raise concerns at an early stage to an internal authority so that immediate action can be taken.

### REPORTABLE INCIDENTS

3. Improprieties may include, but are not limited to: general malpractice such as immoral, illegal or unethical conduct; actual or potential infractions of policy or codes of conduct; wrongdoings, corruption, acts of fraud, theft and/or misuse of property; criminal offences and other breaches of law; undisclosed conflicts of interest; abuses of position for financial or non-financial gain; failures to comply with accounting or internal controls; concealing information about improprieties; any other matters which may cause loss or reputational damage.

### WHISTLE BLOWING REPORTING CHANNELS & ANONIMITY

4. The online reporting facility, **EthicsPoint**, is a secure web platform allowing a disclosure to be made from any computer or smartphone with internet access. The Compassion EthicsPoint site can be accessed at the following address- [www.compassion.ethicspoint.com](http://www.compassion.ethicspoint.com).
5. A report can be anonymous but a whistleblower is encouraged to include his or her name as well as relevant contact details in case further clarification or information is required. To enable an investigation of the concern, the individual should provide details such as the parties involved, date and time of incident, description of incident and evidence or any other information to substantiate the concern.
6. All concerns raised will be reviewed by persons unrelated to the complaint. This will initially be investigators working for Compassion International in the United States. Unless the whistleblower has consented to their identity being disclosed the investigators will endeavour to protect the whistleblower's identity, although it should be acknowledged that others may guess the discloser's identity and in some circumstances the discloser's identity may need to be provided to law enforcement or a court or tribunal. The investigators will involve other persons locally or internationally as relevant to undertaking a proper investigation of the complaint.

## **NO DETRIMENT**

7. CSG is committed to ensuring that genuine whistleblowers receive appropriate protections and do not suffer any detriment.
8. Whistleblowers making reports should ensure that they do so in good faith and that their complaints are not vexatious or without objectively reasonable grounds.
9. This Policy does not and cannot reasonably detail or cover every circumstance. If you are in any doubt you are encouraged to seek your own independent advice.

## **REVIEW OF POLICY**

10. CSG will periodically review this policy and update as required.