WHISTLEBLOWING POLICY

Objective
SICC is committed to a high standard of compliance with financial reporting, internal controls and corporate governance. In line with this commitment, the policy aims to provide an avenue for employees and any other persons to raise concerns on misconduct, irregularities or malpractices without fear of adverse consequences.

Definition
Whistleblowing is defined as a deliberate, voluntary disclosure of individual or organisational malpractice by a person who has or has had privileged access to data, events, or information not publicly known about an actual, suspected, or anticipated wrongdoing within or by SICC that is within its ability to control.

Reportable incidents
Below is a list of examples (though not exhaustive) of reportable incidents covered by this policy:
- Impropriety, corruption, acts of fraud, theft and misuse of SICC's properties, assets or resources;
- Serious conflict of interest without disclosure;
- Concerns about the Club's accounting, internal controls or auditing matters;
- Breach of SICC's policies or code of conduct;
- Any serious improper conduct that may cause financial or non-financial loss to SICC or damage its reputation;
- Participation in or condoning a reportable wrongdoing through wilful suppression or concealment of any information relating to a wrongdoing;
- Harassment, abuse and misrepresentation of power and authority;

Reporting channel
Whistleblowers should provide their names and contact numbers to facilitate investigations. Further clarifications are often needed and helpful in investigations into the feedback/complaints. The ability to investigate depends on the quality and adequacy of the information provided by the whistleblower.

Concerns are preferably made in writing either in the form of a letter or email, and in detail setting out the background and history of events as well as the reason(s) for concern, provided to:

The Audit Committee
The Singapore Island Country Club
180 Island Club Road
Singapore 578774
Email address: auditcommittee@sicc.org.sg or whistleblower@sicc.org.sg

All valid concerns or irregularities raised will be acknowledged and remain confidential throughout and beyond the investigation. The Audit Committee will review and recommend the appropriate course of action to be taken to the General Committee and Management.

Role of Audit Committee ("AC") in Whistleblowing
Upon receipt of a whistleblowing complaint, AC must conduct a preliminary inquiry. In the event if AC determines that a full investigation should be conducted, AC will appoint an investigator or a team of investigators, preferably from within the AC, to carry out a formal investigation and proceed therefrom in accordance with the Investigation Protocol. The AC must ensure the appointed investigator/s' independence whether they are from within or outside the AC. The AC need not obtain the General Committee's permission to initiate the formal investigation, but may inform them if there is no conflict.

Communication of Whistleblowing Policy
Management must ensure that the Whistleblowing Policy and procedures are communicated to, and understood by, all staff, including new employees. A review of staff awareness of the procedures, and managers' understanding of how to act when a concern is raised, must be conducted regularly.

Confidentiality and Fair Treatment
Management must assure confidentiality and fair treatment when a concern is raised, and take steps to prevent the victimisation of genuine whistleblowers.

Awareness of Legal Implications of Whistleblowing Complaints
The AC must assess the legal implications (if any) of a whistleblowing complaint and communicate these to the General Committee and Club Chairman as there may be a legal requirement to report or hand over the matter to the regulatory or other authorities.