

# WHISTLEBLOWING POLICY

Adopted by the Committee of Management, 5 July 2023

### 1. PURPOSE

SCDT is committed to maintaining a high level of integrity, ethic and honesty in our services and operations. To achieve a high standard of corporate governance and compliance with all laws and regulatory requirements, SCDT does not condone any wrongdoing, misconduct, or statutory non-compliance by our member of Committee of Management (the "Board"), employees or volunteers during our work.

#### 2. SCOPE

SCDT's Whistleblowing Policy provides an avenue for anyone to report in confidence and without fear of retaliation or unfair treatment any concerns about suspected misconduct or wrongdoing, including corruption, fraudulent acts, cheating, theft, misuse of SCDT's properties, assets or resources, breach of the organisation's policies, laws or regulations.

#### 3. **PROTECTION**

SCDT does not tolerate any harassment or victimisation and will take appropriate action to protect anyone reporting a genuine concern in good faith. Should there be harassment of the person who submitted the report, he/she can make a report to the Chairperson of the Board.

No action will be taken against anyone who makes allegations in good faith, reasonably believing it to be accurate, even if the allegation is not subsequently confirmed upon investigation.

# 4. ACTING IN GOOD FAITH

Anyone filing a report concerning a violation or suspected violation should act in good faith and not make a false accusation. False or malicious reports which lack any objective basis will not be tolerated, as this will cause unnecessary waste of time for management and anxiety to the person being investigated.

Anyone who knowingly or recklessly makes allegations that cannot be substantiated and/or are maliciously or knowingly to be false shall be viewed as a severe violation of good faith and may be subject to appropriate disciplinary procedures.

# 5. CONFIDENTIALITY

The whistle-blower is encouraged to make his/her identity known to the receiver of the complaint/concern. The identity of the whistle-blower shall be treated with the strictest confidence.

Every effort will be made to ensure the confidentiality of the matter unless relevant disclosure is required by law or statute. In such cases, the whistle-blower shall be informed in advance, and the reasons made clear to him/her. If the whistle-blower wishes to retain his/her confidential status, he/she has the option to withdraw the report to protect his/her confidential status.

Concerns expressed anonymously may hinder investigation work as it is more difficult to look into the matter or protect one's position. Accordingly, SCDT will consider anonymous reports, but concerns expressed or information provided anonymously will be investigated on the basis of their merits.

#### 6. **REPORTING OF CONCERNS**

Report can be made in the following form to the SCDT's Chairperson of the Board. The whistle-blower is required to make his/her identity known to the Chairperson. All reports will be duly acknowledged as soon as possible upon receipt.

Email	Mail
Whistleblowing@scdt.com.sg	The Chairperson
	Singapore Chinese Dance Theatre
	5 Sennett Road Singapore 466781

The report should, as far as possible, include the following information:

- Date, time, place and nature of the wrongdoing- Identity of the parties involved
- Details and/or copies of any relevant documents supporting the report, and
- Name and contact details of the Whistle-blower (Encouraged to help in the investigation when necessary)
- Any other relevant information.

# 7. INVESTIGATION AND OUTCOME REPORT

The Chairperson may appoint a Director to review all reports submitted and shall determine the appropriate action to be taken. If the report is deemed to be frivolous or unsubstantiated, the Board may not take further action on it.

Where the report is deemed to be valid, the Board shall conduct an investigation into the matter. Depending on the complexity and nature of the concern, the Board may engage an appropriate advisor or external service provider to assist in conducting the investigation.

The appointed Director or the appointed investigating officer may, from time to time, contact the person who submitted the report should there be a need to clarify certain matters in the report.

The appointed Director shall, upon conclusion of the investigation, submit a report to the Board on the outcome of the investigation and their recommendation. The Board shall be responsible for ensuring that all recommendations are acted upon.

The whistle-blower shall be kept informed of the outcome of the investigation.

This Policy will be reviewed every other year and subject to amendment when needed.