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1. Purpose

This Policy aims to encourage employees and other stakeholders to report concerns on misconduct or malpractice (i.e., improper, illegal, or negligent behaviour) in good faith, without malice or personal benefit. Without the fear of reprisal, discrimination, or adverse consequences, it enables SASCO (as a group comprising SASCO Home and the CCCS Training Academy) to take timely and appropriate actions for any allegations, thereby propagating a culture of probity, respect and transparency.

2. Scope

The Committee of Management SASCO Limited articulates its direction and intent on whistle-blowing through the whistle-blowing policy. It is designed to provide a clear tone of commitment to employees and other stakeholders that whistle-blowing concerns are important to sound governance and that they are taken seriously by SASCO. They are encouraged to raise their concerns with an assurance of confidentiality and protection in the policy. It articulates how the whistle-blowing process manages concerns from the initiation of the concern to the closure of the case.


The policy includes a framework of accountability and responsibility, competency, monitoring and review to ensure the design and operational effectiveness of the whistle-blowing processes and practices in SASCO. This policy is designed to enable employees and other relevant stakeholders to report any alleged concerns in good faith on misconduct or malpractice.

This policy covers and applies but not limited to:

- All staff, management, Board members, volunteers, service users, suppliers, contractors, and the general public.
- All forms of wrongdoing including fraud, corruption, abuse, harassment, unethical conduct, or breaches of laws/regulations;

of

- SASCO Limited (Co-operative)
- SASCO Senior Citizens' Home
- CCCS International Learning Institute (CCCS ILI)

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3. Policy Objectives

To whistle-blow is to report concerns by employees or other stakeholders in good faith on misconduct or malpractice that may be detrimental to SASCO Home and/or public interest. Whistle-blowing is an essential part of sound governance.

The policy addresses the COM's commitment to proper and ethical behaviour where employees and other stakeholders are encouraged to report concerns without fear of reprisal or unfair treatment.

The objectives of the policy are:

- To provide a formal process to raise and handle whistle-blowing concerns and a framework to support the process.
- To encourage employees and other stakeholders to report improper, unethical, and inappropriate behaviour.
- To provide assurance that all reports will be properly addressed, treated with confidentiality and there are adequate whistle-blower safeguards from reprisal in any form.
- To promote and develop a culture of accountability, integrity, and transparency.

4. Roles & responsibilities


The COM oversees whistle-blowing practices in SASCO. This oversight responsibility requires the establishment of a whistle-blowing policy that is relevant to the context of SASCO as a group.

The Whistle-blowing Governance Officer shall be the Secretary of the COM and he may enlist the assistance of the Executive Office as his Secretariat to ensure that the procedures are carried out in accordance with the policy.

In essence, there are many stakeholders involved in the whistle-blowing process. These include the COM, whistle-blower, alleged party, staff receiving the report, investigator, Whistle-blowing Governance Officer.

5. Confidentiality & Protection

SASCO respects the confidentiality of the whistle-blower and is committed to preserving confidentiality by keeping the report and case information secure and accessible only to designated persons. Aligned with the spirit of confidentiality, SASCO may look into anonymous reports.

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Confidentiality has two sides. Concurrently, the Whistle-blowing Governance Officer should ensure proper confidentiality safeguards of the filed report, while maintaining the confidentiality of those involved in the case. If necessary or lawful circumstances dictate the disclosure of the whistle-blower's identity, SASCO must seek the whistle-blower's consent.


SASCO does not condone any reprisal, discrimination or harassment against whistle-blowers who report in good faith. It is committed to protecting whistle-blowers from threats to employment and any other threats of retaliatory action. Disciplinary actions will be taken against those who retaliate, harass, or discriminate against whistle-blowers.

6. Whistle-blowing process

To raise whistle-blowing concerns – there could be internal and external reporting channels. The internal whistle-blower (e.g., employee) can report to his/her direct supervisor, use the internal channels (e.g., reporting hotline, mail, or online form) or report to an external agency (e.g., Office of the Registrar). Depending on the severity of the alleged concern (e.g., when the concern involves a criminal offence), SASCO can refer the matter to the relevant external agency. On the other hand, the external whistle-blower can raise the concern either through the internal and/or external channels.

- Governance Structure

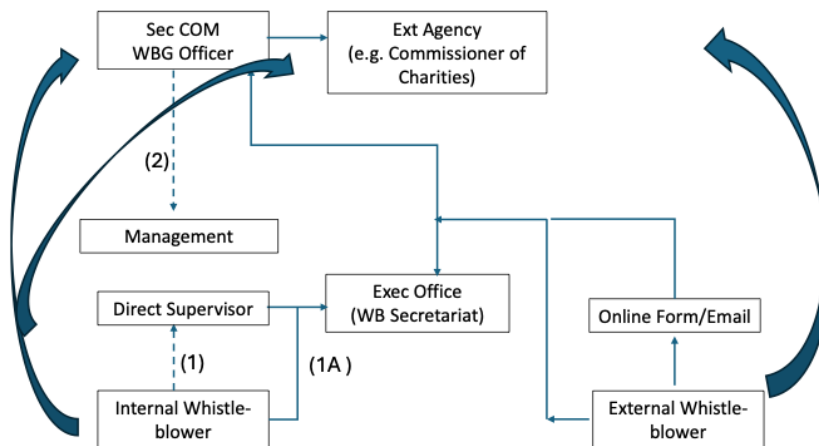
Level	Role	Key Responsibilities
Ultimate Accountability	SASCO Limited Committee of Management (COM)	Approve and review the policy; ensure effectiveness; receive reports on whistleblowing cases.
Oversight and Monitoring	Whistleblowing Committee 1. Chairman SASCO Ltd, 2. Chairman SASCO Home, 3. Secretary SASCO Ltd, 4. Group CEO	Review whistleblowing statistics; ensure independence and fairness of investigations; recommend actions.
Operational Lead	Whistleblowing Governance Officer 1. Secretary SASCO Ltd	Receive, log, and coordinate whistleblowing reports; ensure confidentiality; escalate serious cases. May be assisted by the Executive Office.
Executive Role	1. CEO 2. Senior Management Team	Implement the policy, ensure staff awareness,

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		encourage reporting, act on serious matters.
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- Whistle-blowing Process




1. Staff is unsure and requires assistance of Supervisor to submit to WBG Officer.
- 1A. E.g. by hand
- 2.. WBG may want to keep management in the loop.

Ways to Raise Concerns for Employees and Other Stakeholders

1. Initiation (i.e., raising of the concern).
2. Assessment of the concern.
3. Investigation to substantiate the concern; and
4. Measures to ensure that the recommended course of action is carried out, including proper follow-up, notification of the outcome to the whistle-blower for non-anonymous concern raised and closure of the case

Types of Concerns and Examples of Wrongdoing

Whistle-blowing may cover a wide range of concerns with someone in authority, relating to suspected wrongdoing, misconduct, or irregularities within SASCO Limited, SASCO Senior Citizens' Home, and CCCS International Learning Institute. Examples include, but are not limited to:

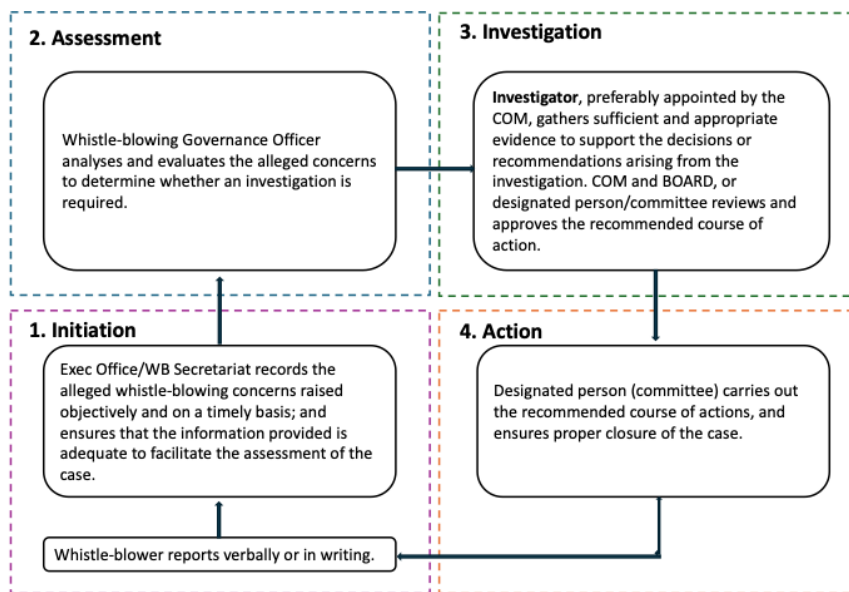
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a.	Financial & Operational misconduct <ul style="list-style-type: none"> ○ Fraud, theft, or embezzlement of funds or assets. ○ Forgery/falsification of documents/invoices, or claims ○ Misuse of charitable funds or donations
b.	Corruption & Bribery <ul style="list-style-type: none"> ○ Offering, giving, soliciting, or accepting bribes or kickbacks ○ Conflicts of interest or undisclosed personal gains ○ Secret or illegal co-operation or conspiracy in order to deceive others. ○ Coverup for wrongdoing
c.	Safety or Harm <ul style="list-style-type: none"> ○ Someone's health and safety in danger ○ Risk or actual damage to the environment

Note: *This list is not exhaustive. Any other conduct that violates SASCO's Code of Conduct, ethical standards, or the law may also be reported under this policy.*


Overview of a Whistle-blowing Process



WHISTLEBLOWING REPORTS

I. Initiation

- a. The Whistleblower can raise the concern through any of the channels mentioned below by completing the Report Form (refer to **Annex A**).

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b. Reports can be made through the following confidential channels:

- i. **Email:** skrishnan@sasco.sg
 - Will be received by SASCO Ltd Secretary, Subramaniam Krishnan
- ii. **Written Report:** Marked *Confidential – Whistleblowing* and addressed to:
 - Whistleblowing Officer (Secretary, SASCO Limited)
SASCO Limited
991 Alexandra Road, #01-04, Singapore 119964

If complaints concern the Secretary, email to :

- Chairman, SASCO Ltd: sgulam@silverscreen.sg

II. Assessment

The Whistleblowing Governance Officer shall:


- a. Determine if the report falls under whistleblowing scope.
- b. Assess severity, potential impact, and urgency.
- c. Decide whether to:
 - Conduct an internal investigation; or
 - Refer to the Whistleblowing Committee for direction.

III. Investigation

- a. The Whistleblowing Committee appoints an independent investigation team, avoiding conflicts of interest.
- b. The Investigation Plan should outline:
 - Allegations and scope
 - Methodology
 - Timeline and reporting schedule

IV. Actions - Reporting of Findings, Escalation, and Decision-Making

- a. The Whistleblowing Committee reviews findings and recommends actions to the COM.
- b. The COM decides on disciplinary or corrective measures, if applicable.

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- c. Serious cases may be escalated to:
 - The Commissioner of Charities
 - Relevant authorities or regulators (MSF/MOH)
- d. Closure and Feedback
 - The whistleblower (if known) shall be informed that the case has been reviewed and closed.
 - Summary outcomes may be shared (without breaching confidentiality).

V. Communications & Training

The whistle-blowing policy is provided to employees by the whistle-blowing Governance Officer, or a designated staff. It is also accessible to all interested parties in SASCO's website.


The whistle-blowing policy is communicated to all staff when they join SASCO, and they are briefed on any updates as appropriate. For assistance on whistle-blowing matters, employees should approach the Head of Human Resources, Whistle-blowing Governance Officer, or the designated staff.

SASCO supports the training of staff involved in whistle-blowing to stay abreast of developments and to be properly equipped to handle whistle-blowing matters.

VI. Monitor & review

The Whistle-blowing Governance Officer (or a designated staff) monitors the status of the whistle-blowing process to ensure that it is operating as designed. Some examples include the trend of concerns raised compared to previous years, the number of concerns that failed to meet the established timeline, to record and report to the Whistle-blowing Governance Office, and the number of cases where the investigation progress is behind schedule. The monitored results should be reported to COM or the Audit Committee.

Internal audit or an independent party will review the whistle-blowing policy for design effectiveness and will check that the procedures are operationally effective. The review is conducted annually or as directed by COM or Audit Committee.

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Annex A

SASCO WHISTLE-BLOWING REPORT FORM

This form is for reporting concerns raised in good faith about suspected misconduct or wrongdoing affecting SASCO Ltd, SASCO Senior Citizens' Home, or CCCS International Learning Institute.

(Personal or employment-related grievances should be addressed through normal HR or departmental channels.)

A. Whistleblower Details (NOT Optional)

(You may NOT submit this form anonymously.)

- Name: _____
- Entity (tick one): SASCO Ltd SASCO Home CCCS ILI
- Designation / Relationship: _____
- Contact (email / phone): _____


B. Details of Concern

Type of Concern (tick all that apply):

- Fraud / Misuse of Funds
- Corruption / Bribery / Conflict of Interest
- Harassment / Discrimination
- Unethical Conduct
- Breach of Laws / Regulations
- Other: _____

Description of Concern

(What happened, when, where, who was involved, and why you are concerned. Attach documents if any.)

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C. Evidence / Witnesses (if any)

- Supporting documents attached? Yes No
- Witnesses (if known): _____

D. Declaration

I confirm that this report is made in good faith and the information provided is true to the best of my knowledge.

Name / Signature: _____ Date: _____

This form is to be submitted in a confidential manner, via:


- Email marked “Whistle-blowing – CONFIDENTIAL”
To: Secretary, Committee of Management, SASCO Ltd
The Whistle-blowing Governance Officer
skrishnan@sasco.sg

If the concern involves the Secretary, you may via email to:

The Chairman, SASCO Ltd at sgulam@silverscreen.sg;

Or if By Hand, to

The Executive Office
991 Alexandra Road, #01-04,
Singapore 119964

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AMENDMENTS LOG

Version History

Version	Date	Version Author	Summary of Changes
1.0	Feb 2026	Eric Song	First Release