

WHISTLE-BLOWING POLICY

1. OBJECTIVE

- 1.1.** The Bone Marrow Donor Programme (BMDP) is committed to comply with all relevant statutory and regulatory requirements with respect to accounting, financial reporting, audits, internal controls, human resources and workplace engagements and any other related matters in our operations.
- 1.2.** This Whistleblowing Policy (the Policy) is intended to provide a framework to promote responsible and secure whistleblowing without fear of adverse consequences.

2. SCOPE

- 2.1.** Employees and outside parties, such as suppliers, customers, contractors and other stakeholders (collectively, “Whistle blower”), may use the procedures set out in the Policy to report any concern or to lodge a complaint.
- 2.2.** The Policy is designed to protect genuine Whistle Blowers from any unfair treatment resulting from their report.
- 2.3.** Complaints that are considered by the Audit and Governance Committee (AGC) to be frivolous or bogus will be disregarded unless the Whistle blower is able or willing to provide additional information.
- 2.4.** The Policy is also not a route to resolve conflicts between employees arising from day-to-day operations, or to take up personal grievances. Suitable avenues have been prescribed in the Staff Handbook to resolve such conflicts.

3. AUTHORITY/RESPONSIBILITY

- 3.1.** Whistle Blower – employees and outside parties, such as suppliers, customers, contractors and other stakeholders who expose any kind of information or activity that is deemed illegal, unethical or not correct within an organisation that is either private or public.
- 3.2.** Audit and Governance Committee – responsible for exercising the powers of the Board in relation to the termination of appointment, dismissal and disciplinary control of Board members and staff.
- 3.3.** Chief Operating Officer (COO) – liaison officer to convene meetings between parties involved to find solutions for a satisfactory outcome should there be any employee-related grievances.

4. POLICY DETAILS

4.1. SAFEGUARDS

- 4.1.1.** The Whistle Blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage the BMDP, and its reputation.

- 4.1.2. Any who retaliates against the Whistle Blower (who reported an event in good faith) may be subject to discipline, including termination.
- 4.1.3. The Whistle Blower shall receive an acknowledgement within five business days of the initial report being lodged with the AGC. A summary report of the investigation may take longer depending on the circumstances surrounding investigation, disposition or resolution of the issue.
- 4.1.4. Whistle Blower who makes a report not in good faith would be subject to discipline, includes termination. This is to protect the reputation of the organisation and members of its Board and staff.
- 4.1.5. The identity of the Whistle Blower shall remain confidential to those persons directly involved in applying this Policy, unless disclosure is required by law to the police or relevant government agencies.

4.2. HANDLING OF COMPLAINTS

- 4.2.1. With the BMDP, the AGC is responsible for exercising the powers of the Board in relation to the termination of appointment, dismissal and disciplinary control of Board members and staff. It is chaired by the AGC Chairperson and where appropriate will co-opt qualified experts to advise and assist in their investigations.
- 4.2.2. When handling complaints, the AGC will maintain a repository of all reported cases and ensure that issues raised are properly resolved. All matters reported will be reviewed within a reasonable timeframe, and after due consideration and inquiry, a decision will be taken on whether to proceed with a detailed investigation.
- 4.2.3. When a detailed investigation is required, the AGC may, as it deems fit, besides evaluating the evidence submitted by the Whistle Blower,
- a. Invite any employees, volunteers or members for a hearing to give evidence before the Committee.
 - b. Interview the Whistle Blower (subject to agreement by Whistle Blower)
 - c. Have such witnesses as each party may wish to call on his/her behalf
 - d. Have access to information provided by all parties tendered as evidence
- 4.2.4. The AGC shall follow the protocol below when the outcome of detailed investigation has been established:
- a. For criminal cases against a person or property, such as assault, rape, burglary, fraud etc, should immediately be reported to external agencies such as the police, or relevant government agencies as appropriate.
 - b. In cases deemed as employee-related grievances, the internal processes stipulated in the Staff Handbook shall be followed. COO will act as liaison officer to convene meetings between parties involved to find solutions for a satisfactory outcome.

Appropriate disciplinary actions should be taken in view of the seriousness of the misconduct (if any).

- c. For cases deemed frivolous and bogus, complaints will be disregarded unless additional substantiating evidence is provided.

4.3. REPORTING MECHANISM

4.3.1. BMDP encourages Whistle Blowers to put their names to their allegations whenever possible. Concerns or irregularities expressed anonymously are more difficult to act upon effectively, but they will be considered, in view of the seriousness and credibility of the issues raised, and the likelihood of confirming the allegation from attributable sources and information provided.

4.3.2. All concerns or irregularities raised will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

4.3.3. It is essential that all critical information available to the Whistle Blower be presented for effective evaluation and investigation of a complaint. Reports made should provide as much details and be as specific as possible.

4.3.4. The complaint includes details of

- a. The parties involved
- b. dates and time
- c. the type of concern
- d. evidence substantiating the complaint, where possible
- e. contact details, in case further information is required

4.3.5. List of irregularities includes

- a. Forgery
- b. Misappropriation of funds and classified documents
- c. Abuse and misrepresentation of power and authority
- d. Failure to comply with laws and regulations
- e. Discrimination of gender, race, disabilities
- f. Harassment
- g. Corruption and bribery
- h. Theft

4.3.6. To lodge a complaint, the Whistle Blower can contact the Audit Committee at:
Audit and Governance Committee, BMDP
Address – 8 Sinaran Drive, #03-02 Novena Specialist Centre Singapore 307470
Email – AGC@bmdp.org



4.4. MODIFICATION

4.4.1. The BMDP may modify this Policy to maintain compliance with applicable laws and regulations or accommodate organisational changes.