Hwa Chong Foundation Limited

Whistle-blowing Policy

Hwa Chong Foundation Limited ("**HCF**") is committed to high standards of corporate governance and accountability in its affairs.

In line with this commitment, this Whistle-blowing Policy (this "**Policy**") aims to provide an avenue for any relevant persons to raise concerns and offer them reassurance that they will be protected from reprisals or victimisation for whistle-blowing in good faith.

This Policy establishes a formalised, secure, and confidential procedure for any individual to disclose or raise concerns on suspected cases of wrongdoings in relation to the affairs of HCF.

Objective

1. This Policy aims to achieve the following objectives:

   (a) Provide a channel for reporting of alleged or suspected fraud, corruption, or other wrongdoings;

   (b) Provide guidance for reporting procedures; and

   (c) Provide assurance to whistle-blowers on protection for reports made in good faith.

Scope of Policy

1. This Policy applies to all HCF officers, employees and representatives and external parties.

2. Whistle-blowers may raise concerns or make reports on suspected wrongdoings under the following categories. This list is non-exhaustive and serves to demonstrate examples of fraud, corruption and other wrongdoings.

   (a) **Fraud**

      (i) Deliberate error(s) in the preparation, evaluation, review, audit of financial accounts and records;

      (ii) Misrepresentation and other falsehood statements in revenue contracting, procurement, grant and other financial related matters;

      (iii) Theft, forgery or alteration of cheques;

      (iv) Misappropriation of cash or assets;

(vi) Making unsubstantiated claims; and

(viii) Unauthorised use or wrongful disclosure of confidential information, such as personal data.

(b) **Corruption**

(i) Bribery;

(ii) Engaging in business transactions with an undisclosed conflict of interests; and

(iii) Extortion or obtaining a favour or money by intimidation or misuse of influence or authority.

(c) **Other Wrongdoings**

(i) Deliberate circumvention of established financial or internal control policies and procedures.

Principles

1. All concerns raised will be treated fairly and properly.

2. All concerns will be handled confidentially, except as necessary or appropriate to conduct an investigation and to take remedial action, in accordance with the applicable laws and regulations.

3. HCF encourages the complainant to identify himself or herself when raising a concern or providing information and HCF will take all reasonable steps to protect the confidentiality and identity of a complainant subject to applicable laws and regulations.

4. HCF will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they turn out to be mistaken so long as the report is made in good faith. However, HCF does not extend this assurance to someone who maliciously raises a matter he or she knows to be untrue. This Policy is not meant to be misused for taking up unjustified personal grievances.

5. This Policy does not cover complaints or feedback unrelated to wrongdoings.

Reporting Procedures

1. HCF takes whistle-blowing seriously. Whistle-blowers may raise any concerns or make any disclosures about wrongdoings to HCF via email at whistleblow@hwachongfoundation.org.sg.

2. All reports must be made formally in writing with full details and background information of the allegations.

3. The following information should be provided, if available:

   (a) Brief description of the wrongdoing committed;

   (b) The date, location and how the wrongdoing was committed;

   (c) Identity of the alleged wrongdoer;

   (d) Particulars of witnesses, if any;

   (e) Supporting evidence and/or documents; and

   (f) Other details that may be useful for investigation.

4. The whistle-blower is encouraged to disclose his or her personal details (i.e. name and contact details) as it may be helpful for the whistle-blower to make a statement or provide evidence as part of the investigative process or in reporting the matter to any relevant law enforcement authority. However, in line with the spirit of confidentiality, HCF does not prohibit anonymous reporting.

Confidentiality and Protection for Whistle-blowers

1. HCF will not tolerate any harassment or victimisation of the whistle-blower because of a report made in good faith.

2. The whistle-blower is assured protection against any unfair treatment by HCF or its representatives, such as intimidation and threats of dismissal or disciplinary action taken against the whistle-blower.

3. HCF is also committed to ensuring that all disclosed information, including the identity of the whistle-blower, shall be handled in confidence, save as otherwise required by law or regulatory authorities. The information may be disclosed by HCF to the persons involved in investigating the relevant matter and/or advising or assisting HCF in relation to the matter.

Responsibility of the Whistle-blower

1. Any reports or disclosures should be made in good faith.

2. If a report made in good faith is not subsequently confirmed through the ensuing investigation, no action shall be taken by HCF against the whistle-blower.

3. However, HCF takes a serious view of malicious reports. Any person who gives false or misleading information intentionally or with wilful negligence with the intent to harm someone may cause material harm to the relevant affected party. Therefore, action may be taken against a person who makes any such report.

How HCF will Respond

1. HCF will set up a Committee of Inquiry to undertake an initial assessment of any whistle-blowing report received. After the initial assessment, the Committee of Inquiry shall submit its report and recommendation to the HCF Board and the HCF Board will decide whether to conduct any further investigation.

2. In the event that the whistle-blowing report discloses a criminal offence, HCF may refer the matter to the relevant authorities.

3. Subject to applicable laws and the requirements of the relevant authorities, HCF shall inform the whistle-blower of its final decision regarding the matter.

With effect from: 23 October 2026