

#### WHISTLE-BLOWING POLICY

St Joseph's Institution Junior ("SJIJ") is a Government-Aided School and a community of The Christian Brothers' Schools ("CBS") in Singapore. SJIJ aims to create an environment anchored on strong Lasallian values and high standard of ethics.

#### 1. Purpose

SJIJ is committed to a high standard of good governance, integrity, accountability, transparency, ethical and legal conduct.

The purpose of a Whistleblower Policy is to provide an avenue for any stakeholder, be it an employee, student, parent or any party to report in good faith wrongful practices which include mismanagement or misuse of resources, or inappropriate conduct and behavior which are not in line with the Code of Professional Conduct for educators without any fear of retaliation or victimization.

#### 2. Scope

For the purpose of this Policy, a wrongdoing includes, but is not limited to, any of the following:

- A criminal offence (e.g. fraud, criminal breach of trust, corruption, cheating, forgery, criminal misappropriation and theft);
- Abuse or misuse of authority;
- Discrimination on the basis of gender or race;
- Harassment or intimidation;
- Undeclared conflict of interests in any activity or decision made that is not, or appears not to be, in the best interest of SJIJ;
- Any deliberate action that is likely to endanger SJIJ's employees, students and members of the public;
- An act to mislead, deceive, manipulate, coerce or influence the preparation, examination, audit or review of any assets and records of SJIJ; and
- Any other deliberate act that may cause significant reputational damage to the school.

# 3. Reporting

Anyone with reasons, who suspects a wrongdoing in SJIJ may write to the email address siji whistleblower@sjijunior.edu.sg, which will be jointly managed by the Chairman and/or Vice-Chairman, and or any other persons designated by the School Council, providing the following information:

- The location of the alleged wrongdoing;
- The key person(s) involved;
- The nature of the alleged wrongdoing;
- The details and evidence of the alleged wrongdoing, including but not limited to date or time period over which the suspected wrongdoing has occurred, photographs, documents, statements, and/or records;
- The whistle-blower's name, email and telephone number (optional).

# 4. Handling Procedure

An acknowledgement will be sent to the whistle-blower via email within 3 to 5 working days.

Upon receiving a whistle-blowing report, the Chairman and/or Vice-Chairman or designate of the School Council would make a judgement and channel the report to the appropriate member(s) of the the School Council or School Management, who shall initiate an investigation to establish the facts.

Cases of very significant wrongdoing would be referred to the CBS' Board Chairman, who may appoint an Inquiry Committee chaired by a Board member with other members being either board members or other independent persons with no conflict of interests. The terms of reference of the committee would be to establish the validity of the complaint and to recommend follow up actions (of a corrective, remedial, preventive, or regulatory enforcement nature).

In the case of an anonymous report, the complaint will be addressed considering the seriousness of the issues or matters raised, credibility of the complaint as may be determined from an analysis of the substance and tone of the report and any corroborative evidence presented. Having considered all information and evidence provided, the School Council or School Management may choose not to pursue the matter further if there is insufficient information available or where it is felt or determined that there is no merit to the complaint. Therefore, to help ensure that investigations are effective, whistle-blowers are encouraged to furnish clear evidence, or substantiating records or documents, or to identify themselves and provide their contact details so that clarifications can be sought, and/or verbal evidence considered.

# 5. Suspected criminal wrongdoing/s

SJIJ's School Council reserves the right to and may refer any concern arising from a whistle-blower report to the appropriate law enforcement agency at any time during the processing of the report, if a criminal wrongdoing is suspected to have occurred.

#### 6. Report made in good Faith

If a whistle-blower reports a concern under this Policy and the investigations subsequently show that it is untrue or false, the whistle-blower will be protected from any form of reprisal provided that the report was made in all good faith and not motivated by a desire for personal gain, malice, or rancor.

If a whistle-blower is found to have made a report maliciously, that is intentionally false or untrue, or for personal gain, the School Council reserves the right to take disciplinary action against the whistle-blower.

# 7. Confidentiality

Every effort will be made to keep the identity of whistle blowers confidential. However, the identity of a whistle-blower may be disclosed in appropriate circumstances such as where the identity is required to be revealed by law, where the whistle-blower has waived his or her right to confidentiality, where the identity has to be disclosed on a strictly confidential basis for the purpose of obtaining professional advice, or where in the opinion of a majority of the Board Members of the School Council, it would be in the best interests of SJIJ to reveal the identity of the whistle-blower.

Approved by:

Dr. Gerard Nah Chairman of St Joseph's Institution Junior's School Council

Date: 2 January 2024