

## **JTC Whistleblowing Policy (Public) – Updated as of Jun 2023**

### **Introduction**

JTC is committed to a high standard of corporate governance and business ethics. In line with this commitment, JTC's whistleblowing policy ("the policy") aims to provide an avenue to raise concerns of wrongful practices at an early stage and in the right way without fear of reprisal, detriment or adverse personal consequences.

### **What to Disclose**

This policy provides a framework for managing disclosures of suspected incidents involving wrongful practices, which significantly affect JTC and its operations. Incidents of wrongful practices include (but are not limited to):

- a) Breach of law or policy;
- b) Fraudulent act;
- c) Corruption (bribery);
- d) Collusion;
- e) Criminal offence;
- f) Wilful suppression or concealment of any relevant information relating to wrongful practice;
- g) Endangering act to person or property; and
- h) Others (improper practices/activities), which may cause financial or non-financial loss to JTC, or damage JTC's reputation).

### **How to Make a Disclosure**

The whistleblower can make a disclosure via the following channels:

- i. email [whistleblower@jtc.gov.sg](mailto:whistleblower@jtc.gov.sg); or
- ii. call the telephone number @ 6883 3999

The disclosure should contain as much details as possible to enable a proper and thorough investigation of the allegations.

### **Identity of Whistleblower**

The whistleblower is strongly encouraged to provide his/her name and contact details when making a disclosure in the event if the investigating team needs to liaise with the whistleblower for more information and/or verify on the facts of the disclosure.

## **Confidentiality**

When a disclosure has been made, every reasonable effort will be made to protect the confidentiality of the whistleblower's identity, and the information provided. Notwithstanding this, if there is a requirement by the laws of Singapore to reveal these details to relevant parties such as the police, law enforcement agencies, lawyers, JTC would be obliged to do and may inform the whistleblowers when necessary.

In order not to jeopardize the proceedings in any investigation, whistleblowers are also advised to maintain confidentiality regarding their disclosures and involvement in the investigations.

## **Protection for Whistleblowing**

This policy is meant to respect the confidentiality of information and identities of whistleblowers JTC would like to assure all whistleblowers that necessary measures will be taken to protect them from reprisal or negative personal consequences subsequent to their disclosures.

## **Reminders**

The making of false, baseless, frivolous, malicious or reckless disclosures and the abuse of this whistleblowing policy in any manner are strictly disallowed. If it is discovered that the whistleblower has acted in such manners, the whistleblower can be reported to the relevant law enforcement agencies. JTC may also consider civil proceedings against the whistleblower. Disclosures should be made in good faith. If a report is made in good faith, but a case of wrongful practice cannot be established after investigation, no action will be taken against the whistleblower.

It is important to note that the facts provided during the investigation proceedings should be true, accurate and complete. Whoever provides any information to a public servant, which he knows or believes to be false, misleading or omits information, which represents the true state of the matter, may subject the individual to criminal proceedings in accordance to section 182 of the Penal Code (Cap.224).

## **Frequently Asked Questions**

### ***Q: How much detail should I include in my disclosure?***

A: The disclosure should contain as much detail as possible, including (not limited to):

- Name and contact details;
- Nature of the wrongful practice;
- Names of person(s) / company(ies) allegedly involved;
- Relationship with the alleged person(s) / company(ies);
- Names and contact details of any witnesses;

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- Description of the incident (including date, time, location, how did the incident occur and the probable cause(s) of the incident);
- Duration of the incident, frequency of occurrence and when the incident was first noticed;
- Details of any physical or material evidence you know of; and
- The value of any money or asset involved (if this is relevant in the disclosure).

### ***Q: How long should I make a disclosure after I notice irregularities in an incident?***

A: The earlier the whistleblower makes a disclosure, the more effective it is for JTC to verify the facts of the case and maintain the essence of the investigation.

### ***Q: What are examples of wrongful practices?***

A: The examples of wrongful practices listed below are not exhaustive and are meant to give a general indication of the kind of incidents, which should be disclosed.

#### Breach of laws or policies

- Prima facie breach of regulatory requirements, e.g. financial, cyber and data security, environmental, manpower, building, fire safety laws, etc.;
- Breaches of confidentiality relating to sensitive or confidential information of JTC, its customers or contractors; and
- Deliberate failure to comply with legal obligations and/or JTC policies.

#### Fraudulent acts

- Deliberate error(s) in the preparation, evaluation, review or audit of claims, bills and financial accounts;
- Misuse and mismanagement of funds or other resources; and
- Falsification of document(s) or electronic record(s).

#### Corruption (bribery)

- When an individual solicits, gives, receives, accepts promises, monies, gifts, loans, payment, employment, contract, commission, favours, etc. in the capacity as a JTC officer at work. This can be further illustrated with the following examples:
  - i. A JTC officer receives gratification (e.g. money, gifts, promises, services, sexual favours) which affect one's judgement, conduct to perform a favour with corrupt intent.
  - ii. A JTC officer provides payment or favour in order to persuade/induce someone in a position of responsibility to betray that responsibility.

#### Collusion

- When a JTC officer works discreetly with another party (internal or external) to deliberately misuse funds and/or resources belonging to JTC for their personal benefit(s).

#### Criminal offences

- Activities that are punishable offences under the Penal Code (Cap.224) including

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theft, forgery, furnishing false information to a public servant, abetment, hurt, criminal force and assault, criminal breach of trust, cheating, etc.

### Wilful suppression or concealment of wrongful practices

- Not observing proper procedures for procurement and revenue tendering;
- Aiding and abetting a wrongful practice through suppression or concealment of any information; and
- Intentional provision of incorrect information to public bodies.

### Endangering acts to persons or properties

- Conduct or activities that may endanger the health, safety, security, well-being of persons or properties in JTC premises, e.g. harassment, blackmail, acts of mischief, vandalism, etc.

### Others

- Improper practices/activities, which may cause financial or non-financial loss to JTC, or damage JTC's reputation.

### ***Q: May I remain anonymous when making a disclosure?***

A: Anonymous disclosures are difficult to act upon as there may be insufficient evidence to substantiate the allegations. Furthermore, the investigation will not be thorough and complete if the investigating officer cannot obtain further information from you or ascertain whether your disclosure is made in good faith. Hence, you are encouraged to provide your name and contact details.

### ***Q: How are my identity and contact details used or protected after I make a disclosure?***

A: The provision of details such as your name, identification numbers, contact information allow the investigating officer to contact you for additional information on the case or verification of the facts provided in your disclosure. Additionally, we can keep you updated on the outcome of the investigation, if you are a vested party in the case.

Your identity and contact details will be kept confidential by JTC in adherence to the laws of this land unless you permit them to be disclosed during the course of an investigation.

Notwithstanding the above, there may be circumstances when it is necessary/inevitable to disclose the whistleblower's identity. Such circumstances include (but not limited to):

- In situations when JTC is legally obliged to disclose the whistleblower's identity;
- Assisting in criminal investigations by providing information such as whistleblower's identity and contact information whenever required by the laws of this land, e.g. money laundering offence under the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act (Cap. 65);
- When the whistleblower's identity can be obtained from public domains; and
- Written discourse with lawyers, accountants who are engaged for JTC to solicit professional advice during an investigation.

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### ***Q: What if I am unsure whether to make a disclosure, even though I suspect or have access to information regarding an alleged wrongful practice?***

A: Many disclosed cases were uncovered through tipoffs from honest, genuine individuals who might not have the full facts of the matter at the material time. Hence, we sincerely encourage those who are witnesses or have information privy to an incident of wrongful practice to come forward and share their encounters with JTC. Disclosing what you know is sufficient and may be the first step in uncovering a wrongful practice.

### ***Q: Why do we need to disclose wrongful practices to JTC?***

A: You are strongly advised to disclose any wrongful practice promptly to JTC so it can be assessed and dealt with appropriately and promptly to minimise potential risks, damages to JTC. In so doing, you are also contributing to JTC's firm commitment to uphold a high level of corporate governance.

### ***Q: How will my whistleblowing disclosure be assessed?***

A: All whistleblowing disclosures will be taken seriously according to the following procedures:

1. The disclosure will be acknowledged in writing within 5 working days to confirm receipt and that the case will be assessed. JTC's investigating officer may contact you within 14 working days to follow up.
2. Please state if you have a personal interest (e.g. victim) in the case.
3. JTC will assess your disclosure and initiate an investigation when necessary.
4. You may be asked to provide more information during the course of an investigation. Any follow up action will depend on the nature of the incident and the quality of information provided.
5. A whistleblowing case may be concluded without further investigation if it is found that the evidence(s) is insufficient/too weak to disclose any wrongful practice took place.

### ***Q: Will I be involved after I disclose an incident on wrongful practice?***

A: You are not required to be involved after you have disclosed the case. However, if you leave your contact details with us:

1. JTC may inform you if an investigation has initiated.
2. You may be contacted to verify the information you provided or to assist in the investigation if required.
3. JTC endeavours to inform you if a referral to any law enforcement agencies is about to take place or has taken place. Such referrals may be made without your knowledge or consent if JTC considers the circumstances appropriate.

If you have any new, additional information or would like to make any amendments to your disclosure, you may do so using the same procedures as mentioned above in the policy.

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***Q: Do I get any reward(s) for disclosing incidents involving wrongful practices?***

A: No, there is no reward for disclosing a wrongful practice.

***Q: Will there be an investigation after a disclosure is made and will I be informed on the outcome of the investigation?***

A: JTC will initiate an investigation if there are merits in the disclosure and sufficient information has been provided, e.g. provision of contacts and credibility of witnesses, presence of documentary evidence, etc. JTC will conclude the investigation with the most appropriate course of action(s) and will keep you informed of the outcome when necessary.