



AWARE - WHISTLEBLOWING POLICY

INTRODUCTION

1. AWARE is a not-for-profit organization that relies largely on donations, grants and member subscriptions to achieve our goals and mission. Being an organization that advocates for gender equality and woman's rights, AWARE also has the responsibility of ensuring that all our employees uphold a high standard of integrity to maintain the trust and confidence our members have placed on us. Thus, AWARE is committed to steward its resources responsibly by maintaining an ethical culture, one of integrity and compliance with laws, regulations and standards.
2. In line with the above commitment, this Policy is intended to provide a channel for the reporting of actual or suspected wrong-doings committed by any AWARE full time/part time employee, secondment staff, volunteers (including board members) and contractors for investigation and corrective action as well as provide assurance that the Whistleblower will be protected from reprisals for whistleblowing in good faith.

SCOPE

1. Any employee, secondment staff, contract staff, member, volunteer, vendor, contractor or member of the general public who notices or is aware of any wrong-doings can lodge a report.
2. Wrong-doings can be described as, but are not limited to the following:
 - a. Illegal activities, unethical and improper practices relating to financial and accounting matters and standards, which may include:
 - i. Falsification, forgery or fraudulent alteration of documents (cheques, bank drafts, contractual agreements, purchase orders, invoices, etc.) or data such as financial, operational and computer data and submission of fictitious documents.
 - ii. Misappropriations/improprieties in the handling of funds, securities (investments in bonds, stock & shares and deposits, etc), supplies, or any other assets.
 - iii. Questionable accounting and auditing practices.
 - iv. Corruption and bribery.
 - v. Theft and other dishonest acts.



- b. Non-compliance with laws, regulations and policies
- c. Breach of AWARE’s Constitution and Bye Laws, laws and regulations, policies and codes of conduct applicable to AWARE, AWARE [Values and Operating Principles](#).
- d. Acts of retaliation, namely actions causing harm, intimidation or harassment, as well as discrimination or unfair treatment in relation to employment or career against employee who have made an allegation or assisted in the investigation of an allegation.

WHISTLEBLOWING REPORTING CHANNELS

The channels for reporting are:

<u>Report to</u>	<u>Channels</u>
Audit Committee Chairman	Email: whistleblowing@aware.org.sg Postal Address: Block 5 Dover Crescent, #01-22, Singapore 130005.

HOW TO MAKE A REPORT

1. The Whistleblower should ensure that all claims of wrong-doings are made in good faith. When making a report, he/she should provide as much details as possible in relation to:
 - a. What is the alleged act?
 - b. Who is involved in the act?
 - c. When and where did it occur?
 - d. What are the supporting documents and evidence?

The report could be in verbal or written form. For written complaints, the Whistleblower may fill up the Whistleblowing Form (Annex A).

2. The Whistleblower is encouraged to identify himself/herself and provide his/her contact details. Concerns raised anonymously are much less persuasive and may



hinder investigation work as it is difficult to look into the matter or to protect the Whistleblower's position.

3. After making a report, the Whistleblower should refrain from further investigation of the incident, confrontation of the accused or further discussion of the incident. If he/she has identified himself/herself, he/she may be contacted by the investigation team to provide additional information or clarification, where appropriate.

HOW WILL AWARE RESPOND

1. All reports received will be treated confidentially.
2. The Whistleblowing Unit, managed by the Audit Committee, will handle reports of alleged wrong-doings.
3. After receiving the report, a preliminary assessment will be conducted based on the information provided. If there is a prima facie case, a thorough investigation will be carried out. There may be circumstances where there is insufficient evidence to proceed, particularly in situations of anonymous reporting.

PROTECTION OF WHISTLEBLOWER

Consistent with the policies of the AWARE, the Audit Committee and AWARE's management will not retaliate or attempt to retaliate, and will not tolerate any retaliation or attempted retaliation by any other person or group, directly or indirectly, against anyone who, in good faith, makes a report or provides assistance to the Audit Committee, or any other person or group, including any governmental, regulatory or law enforcement body, investigating or otherwise helping to resolve a report.

MODIFICATION IN THE POLICY

The Audit Committee or the Board of Directors of AWARE can modify this Policy unilaterally at anytime without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulations and / or accommodation organizational changes within the AWARE.

PUBLICATION OF POLICY

The policy is made available at AWARE website www.aware.org.sg

EMPLOYEE ACKNOWLEDGEMENT OF WHISTLEBLOWER POLICY



I have read, understand and will comply with the AWARE's Whistleblower Policy.

I have been given a copy to retain for my reference and I have access to the Policy via the AWARE's website www.aware.org.sg

Print Name

Signature

Date



ANNEX A - Whistleblowing Form

Informant Name	NRIC/Passport No.	Date of report
Contact details	Tel. No. <i>(include a convenient time to be contacted)</i>	
	Email	
Impropriety		
Nature		
Details / Facts <i>(E.g. date of incident, how was incident discovered, how long has the impropriety been happening, contract, value, documentation of evidence where available, etc.)</i>		
Alleged perpetrator(s) Department(s) involved		
Informant Signature		