

## **Whistleblowing Policy**

This policy sets out the framework for whistle-blowers to raise concerns on irregularities within the organisation. In order to remain relevant, this policy will be reviewed and updated regularly.

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#### 1.0 Scope

This policy sets out the avenues for whistle-blowers to report improper inappropriate practices that they observe to have occurred in the organization.

Such improper or inappropriate practices may include:

- Theft and/or misuse of Blossom Seeds' properties, assets or resources (including confidential information)
- Blossom Seeds or circumvention of internal controls or policies
- Irregularities in financial reporting
- Unlawful offence being committed
- Any form of harassment
- Discrimination on the basis of gender, race and disabilities
- Abuse of power and authority
- Corruption and bribery
- Concealment or wilful suppression of any wrongdoing
- Endangerment to health or safety of persons

#### 2.0 Out of scope complaints

Incidents or complaints that fall outside the scope mentioned above, which are related to service quality or performance issue, should be reported to the relevant internal response channels like the Head of department or the Chief Executive. Similarly, normal human resource grievances should be taken up with the Blossom Seeds Human Resource Department.

#### 3.0 Reporting Protocol

Whistle-blowers may report by email to cheowthiam.aw@blossomseeds.sg

Reports made will be screened and reviewed for the appropriate follow up action to address the concern raised. The follow up action may include further clarification of facts, closure of case with satisfactory explanations provided, and commencement of internal investigation or where appropriate; it will be referred to external parties such as the external.

#### 4.0 Information to Provide When Whistle Blowing

To assist in assessing and investigating the reported incidents or concerns effectively and efficiently, whistle-blowers should specify as much specific and factual information as possible so as to allow for proper evaluation of the nature, extent, validity and urgency of the matter reported.

The following key information should be provided (where applicable):

- 1. The alleged event or matter that is the subject of concern;
- 2. The name(s) of the person(s) and/or parties involved;
- 3. The date and place in which the event has taken place; and
- 4. Any additional information, documentation or evidence available to support the matter, event or issue reported.
- 5. Contact details of the whistle-blower.

A distinction will be made between anonymous and non-anonymous complaints as more weight will be placed on the latter. Whistle-blowers are encouraged to identify themselves (for transparency and to give more legitimacy to a complaint).

Anonymity deprives the investigative services of the possibility of asking the source for clarification or more information and enhances the risk of frivolous, malicious or unreliable information.

#### 5.0 Safeguards & Confidentiality of Whistle-blower

Blossom Seeds will not tolerate harassment or victimization against a whistle-blower that raises a concern in good faith.

The whistle-blower who believes that he/she is being unfairly treated as a result of having made a report or given evidence as a witness in respect of the wrongdoing may raise a complaint to the Chairman of the Audit Committee. Any form of retaliation undertaken against the whistle-blower for raising a concern in good faith is prohibited. In such cases, disciplinary measures will be taken against the person undertaking the retaliation.

All information (including the identity of the whistle-blower) disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation or to take any remedial action, in accordance with applicable laws and regulations.

#### 6.0 Where the Whistle-blower is a staff of Blossom Seeds

In reporting a concern, staff should exercise due care to ensure the accuracy of the information. If, however, an allegation is made frivolously, maliciously, or for personal gain, disciplinary action may be taken to deter any abuse of the Policy.

If a staff member reports a concern in good faith, which is not confirmed by subsequent investigations, no action will be taken against that staff member.

Particular care will be taken during staff appraisal and promotion procedures to ensure that the whistle-blower suffers no adverse consequences in this context

# Version update:

This handbook has been revised and updated as follows.

Updated by	Date
Ong Ai Lan	13 October 2021