

# Whistleblower Policy

## Interpretation:

- The Company a company incorporated in Singapore whose registered office is 30 Merchant Road #03-22 Riverside Point Singapore 058282.
- An eligible Whistleblower (“[The Whistleblower](#)”) who makes a disclosure of reportable conduct in the manner described in this policy.

## Eligible Whistleblower

All current and former partners, directors, officers, company secretaries, employees, secondees, contractors, suppliers (or their employee or subcontractor) and volunteers. It also applies to relatives, dependents or spouses of any of these people.

## Discloses Reportable Conduct (anonymously if **The Whistleblower** choose)

- Where there are reasonable grounds to suspect misconduct or an improper state of affairs; an offence or contravention under commonwealth law or a danger to the public or financial system.
- Illegal conduct, fraud, money laundering, offering or accepting a bribe, financial irregularities, failure to comply with, or breach of, legal or regulatory requirements, and engaging in or threatening to engage in Detrimental Conduct.

## What are the Reportable Conduct?

Reportable Conduct is anything that **The Whistleblower** have reasonable grounds to suspect, in relation to **The Company**, is:

- misconduct, or an improper state of affairs or circumstances;
- conduct that constitutes a contravention of laws specified in the Whistleblower Laws or other Singapore laws that are punishable by imprisonment for a period of 12 months or more; or
- conduct that represents a danger to the public or the financial system.

Examples of Reportable Conduct include but are not limited to:

- illegal conduct, such as theft, violence or threatened violence, and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;
- failure to comply with, or breach of, legal or regulatory requirements; and
- engaging in or threatening to engage in Detrimental Conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

Reportable Conduct excludes personal work-related grievances as described below.

## Personal work-related grievances

A personal work-related grievance is a report of behavior that has implications for the discloser personally and does not have significant implications for **The Company** (that do not relate to **The Whistleblower**). Examples include:

- an interpersonal conflict between **The Whistleblower** and another Employee, or
- a decision relating to **The Whistleblower** employment or engagement, such as a transfer, promotion, or disciplinary action.

Personal work-related grievances do not qualify for protection under the Whistleblower Laws or this Policy. Personal work-related grievances must be raised to **The Whistleblower** manager or **The Company's** Management Team.

## When can I make a Whistleblower Report?

Before making a Report, **The Whistleblower** should have reasonable grounds to suspect Reportable Conduct. ‘Reasonable grounds to suspect’ is based on objective reasonableness of the reasons for the suspicion. In practice, a mere allegation with no supporting information is unlikely to reach that standard.

However, a Whistleblower does not need to prove their allegations. In addition, the disclosure can still qualify for protection even if the disclosure turns out to be incorrect.

## How can I make a Whistleblower Report?

### The Whistleblower Management Team

- The Reporting Officer – HR Manager / CEO
- The Investigation Committee – **The Company's** Management Team

### Contact Info

Office No.: 6337 5449

Email address: [amanda@cma-academy.com](mailto:amanda@cma-academy.com) / [michelle@cma-academy.com](mailto:michelle@cma-academy.com)

### What should I include in the report?

Please provide as much detailed information as possible so that **The Whistleblower's** report can be investigated. Some useful details include:

- date, time and location;
- names of person(s) involved, roles and their business group;
- **The Whistleblower** relationship with the person(s) involved;
- the general nature of **The Whistleblower** concern;
- how **The Whistleblower** became aware of the issue;
- possible witnesses; and
- other information that **The Whistleblower** have to support the report.

### Should I make a Whistleblower Report anonymously?

**The Whistleblower** can choose to make the disclosure anonymously and if so, **The Whistleblower** will still be protected under the Whistleblower Laws. However, requiring complete anonymity may practically make it more difficult for **The Investigation Committee** to investigate the issue or take the necessary action. By letting **The Company** know who he/she are, **The Company** can contact **The Whistleblower** directly to discuss the concerns which will help **The Company's** investigate the complaint more quickly and efficiently.

### Identity Protection

Where **The Whistleblower** make a disclosure, the identity (or any information which could identify **The Whistleblower**) will only be shared where:

- **The Whistleblower** provide consent; or
- **The Company** is permitted, or otherwise required, by law.

However, **The Whistleblower** should be aware that in certain circumstances, it does not need **The Whistleblower** consent to share his/her disclosure if:

- the information does not include **The Whistleblower** identity;
- **The Company** have taken all reasonable steps to reduce the risk that **The Whistleblower** will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the Whistleblower Report.

**The Company** are committed to taking all reasonable steps to protect **The Whistleblower** from Detriment as a result of making a report under this Policy and the Whistleblower Laws.

### Detrimental Conduct is not tolerated

**The Company** does not tolerate any form of Detrimental Conduct taken by any person against the Whistleblower or any people who are involved in an investigation of a Whistleblower Report.

Examples of Detrimental Conduct can include, but are not limited to:

- dismissal of an employee or alteration of an employee's position/ duties to their disadvantage, or negative performance feedback that is not reflective of actual performance
- harassment, intimidation, or bullying; and
- threats to cause detriment.

Examples of actions that are not Detrimental Conduct may, for example, include:

- managing a Whistleblower's unsatisfactory work performance, if the action is in line with **The Company's** performance management framework
- administrative action that is reasonable to protect the Whistleblower from Detriment.

The Company takes all allegations of Detrimental Conduct very seriously. If **The Whistleblower** believe that he/she are suffering Detriment, he/she should report it to **The Company** whom will take appropriate steps in accordance with this and **The Company's** other policies.

#### **False or misleading disclosures**

When making a disclosure, **The Whistleblower** will be expected to have reasonable grounds to suspect the information he/she are disclosing is true, but **The Whistleblower** will not be subject to a penalty if the information turns out to be incorrect. However, **The Whistleblower** must not make a report that he/she know is not true or is misleading. This may be a breach of **The Company's** Principles of Business Conduct and will be considered a serious matter that may result in disciplinary action. There may also be legal consequences if **The Whistleblower** make a knowingly false report.

#### **What is the investigation process?**

While the particular circumstances of each Whistleblower Report may require different investigation steps, all investigations will:

- follow a fair process;
- be conducted as quickly and efficiently as the circumstances permit;
- determine whether there is enough evidence to substantiate the matters reported; and
- be independent of the person(s) concerned with the allegations.

**The Investigation Committee** will provide **The Whistleblower** with feedback, as appropriate on the progress and expected timeframes of the investigation.

#### **Fair treatment of the individuals mentioned in the Whistleblower Report**

The investigation process outlined in this Policy is also designed to allow fair treatment of any individuals mentioned in the disclosure; including:

- Disclosures will be handled confidentially;
- Matters reported will be assessed and may be subject to an investigation;
- There will be a presumption of innocence until the outcome of the investigation is determined; and
- The purpose of the investigation is to determine whether there is enough evidence to substantiate the matters reported.

#### **What happens after an investigation?**

**The Company** will notify **The Whistleblower** once an investigation has been completed. **The Company** may be unable to disclose particular details or the outcome of the investigation.

#### **The Investigation process**

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#### **Supporting System**

**The Company** will support you where you have concerns about Detrimental Conduct or the investigation process.

Although **The Company** will endeavour to support all Whistleblowers, we will not be able to provide the same practical support to non-partners and non-Employees that it provides to current partners and Employees. Consequently, the processes in this Policy will be adapted and applied to the extent reasonably possible.

**The Whistleblower** should inform The Reporting Officer if he/she are concerned that:

- **The Whistleblower** may be, are being, or have been subjected to Detrimental Conduct;
- there has been a disclosure of **The Whistleblower** identity contrary to this Policy; or
- **The Whistleblower** disclosure has not been dealt with in line with this Policy.

The Reporting Officer will report **The Whistleblower** 's concern to The Investigation Committee for consideration.

**Contact information:**

If you are unsure or needed clarifications/advice, you can reach out to the following office- in-charge:

- **HR Manager:** Amanda Ang  
email: [amanda@cma-academy.com](mailto:amanda@cma-academy.com)  
Hp: 8233 2202
  
- **CEO:** Michelle Lim  
email: [michelle@cma-academy.com](mailto:michelle@cma-academy.com)  
Hp: 9382 0313