WHISTLEBLOWING POLICY

MontfortCare

Use this Whistleblowing Policy if you want to report suspected misconduct, unethical conduct, legal or regulatory breaches, or wrongdoing affecting Montfort Care, beneficiaries, customers, stakeholders or the public.

This Policy applies to Employees and external stakeholders, including volunteers, vendors, service providers, beneficiaries, donors and members of the public.

If you want to raise concerns relating to your personal employment situation or workplace experience, please refer to the Grievance Handling Policy.

If you have any questions about the Whistleblowing Policy, please contact Head of Corporate Governance.

Montfort Care ("**MFC**") is committed to a high standard of transparency, integrity, compliance and accountability. MFC's Whistleblowing Policy ("**Policy**") aims to provide an avenue through which employees or members of the public could, in good faith, report any activity that infringes on MFC's code of conduct or violates the law so that MFC may take the relevant action(s) if necessary.

1. OBJECTIVES AND DEFINITIONS

1.1 Whistleblowing refers to the reporting concerns by Employees or other stakeholders, in good faith, on misconduct or malpractice that may be detrimental to MFC and/or against public interest.

1.2 A Whistleblower is not required to prove that the reported concern is true. A report will be regarded as made in good faith where the Whistleblower honestly and reasonably believes that the information disclosed may evidence wrongdoing, misconduct or an improper act.

1.3 This Policy addresses the commitment of MFC to proper ethical behaviour where Employees and other stakeholders are encouraged to report concerns without fear of reprisal or unfair treatment.

1.4 This Policy applies to Whistleblowing concerns raised in good faith through internal or external reporting channels. Any Employee who knowingly makes a false, malicious or frivolous report may be subject to disciplinary action.

1.5 The objectives of the Policy are:

(a) establish a formal process and framework for the reporting, handling and investigation of Whistleblowing concerns;

(b) encourage employees and other stakeholders to report in good faith any actual or suspected improper, unethical, illegal or inappropriate conduct;
(c) provide assurance that all reports will be treated seriously, handled as confidentially as reasonably practicable, and that Whistleblowers will be protected from retaliation, reprisal or detrimental treatment for making a report in good faith; and
(d) promote a culture of accountability, integrity, ethical conduct and transparency within MFC.

In this Policy, these terms are defined as follows:

Term	Definition
Board Audit Committee	Audit Sub-Committee of the MFC Board of Directors.
Board Members	Members of the Board of Directors of MFC.
Board Appointment & Nomination Committee	Appointment & Nomination Sub-Committee of the MFC Board of Directors
Corporate Governance department	The function responsible for ensuring that MFC operates in a manner that is ethical, transparent, and compliant with legal and regulatory requirements.
Directors	The Deputy Director / Director is the most senior Employee of MFC leading each department/ pillar.
Employee	Any individual engaged by Montfort Care as an employee, whether on a permanent, temporary, fixed-term, part-time or probationary basis, and may include interns, secondees and contract staff working under the direction or supervision of the Montfort Care.
Grievance	Any work-related concern, complaint, dissatisfaction or sense of unfair treatment raised by an employee regarding their employment, work environment, working relationships, workplace conduct, management decisions, or the application of company policies and practices.
Investigation	The formal process of reviewing, assessing and examining a Whistleblowing report or allegation to determine the relevant facts, circumstances and whether there is sufficient evidence of misconduct, wrongdoing, policy breaches or regulatory non-compliance.

Term	Definition
	An investigation may include the collection and review of documents and records, interviews with relevant persons, fact-finding activities, and the preparation of findings and recommendations for appropriate action.
Senior Management	Employees with job grades MFC 5 (Deputy Director) and higher.
Whistleblowing	The reporting, in good faith, of any actual or suspected misconduct, unethical behaviour, illegal activity, regulatory breach, fraud, corruption, malpractice, or other improper conduct involving MFC, its Employees, officers, representatives, vendors or related parties. A Whistleblowing report may be made where the reporting person reasonably believes that the information disclosed shows or tends to show wrongdoing, whether or not the allegation is ultimately substantiated.
Whistleblower	A person who raises a Whistleblowing concern in good faith under this Policy.
Whistleblowing Form	The form that may be used by a Whistleblower as set out in Appendix 1.

2. POLICY SCOPE

2.1 Scope of Policy

This Policy is intended to enable Employees and other stakeholders to raise, in good faith, concerns relating to any actual or suspected improper conduct, unethical behaviour, malpractice, illegal activity or serious misconduct involving MFC, its Employees, Senior Management, officers, representatives, vendors or related parties. Such concerns may include, but are not limited to:

(a) fraud, theft, corruption, bribery, kickbacks, embezzlement or financial misreporting;

(b) serious breaches of MFC's policies, code of conduct or governance requirements;

(c) abuse of authority, misuse of position or conflicts of interest;

(d) sexual harassment, discrimination, bullying or other serious workplace misconduct;

(e) serious breaches of applicable laws, regulations or regulatory requirements;

(f) conduct that may cause financial or non-financial loss to MFC, or damage to MFC's reputation; and

(g) any deliberate attempt to conceal, suppress or cover up any of the above matters.

2.2 Exclusions

Grievances relating solely to an individual's employment terms, performance evaluation, interpersonal conflicts or career progression may not fall within the scope of this Policy unless they involve broader misconduct, regulatory breaches, unethical conduct, retaliation, or matters affecting the wider organisation or public interest. If you are an Employee and wish to submit a Grievance, please refer to the Grievance Handling Policy.

3. WHISTLEBLOWING PROCESS

3.1 The following table is an overview of the Whistleblowing process. Details of the process are set out after the table.

Step	Details	Timeline
1. Initiation	Whistleblower submits the completed Whistleblowing Form to: • audit@montfortcare.org.sg; or • by postal mail to Head of Corporate Governance, Montfort Care 624 Upper Bukit Timah Road Singapore 678212	
1.1 Holding response	Corporate Governance department to write to the Whistleblower (if not anonymous) to provide a holding response and state that the incident will be reviewed.	Within 3 working days of receiving the Whistleblowing Form.
2. Assessment	Corporate Governance department will: a) review the Whistleblowing Form b) prepare a summary and a recommendation whether the	Within 3 working days of receiving the Whistleblowing Form.

Step	Details	Timeline
	reported incident warrants an Investigation. Corporate Governance department will submit the Whistleblowing Form, the summary and its recommendation to the Board Audit Committee (“Whistleblowing Report”).	
	Board Audit Committee to decide if they wish to proceed with an Investigation.	Within 5 working days of receiving the Whistleblowing Report.
	If Board Audit Committee decides **to proceed with an Investigation**, see Step 3.	
	If Audit Committee decides **not to proceed** with an Investigation, Corporate Governance department to refer the matter to the relevant department for follow-up, or to close the matter. Corporate Governance department will update the Whistleblower.	Within 3 working days of receiving the decision of the Board Audit Committee.
3. Investigation	Board Audit Committee to create an Investigation team consisting of 3 independent members who are not associated with the Whistleblowing incident. The Investigation team can consist of Employees, Senior Management, Board Members and/or independent advisors.	Investigation team to be set up within 3 days of the decision to proceed with an Investigation.
	Investigation team to submit Investigation report to Board Audit Committee. The Investigation report should contain: • Summary of incident • Findings • Recommended next steps	Timeline depends on complexity of the case. Clear-cut cases should be concluded within 10 working days, while complex

Step	Details	Timeline
		cases might take months.
	Board Audit Committee to review Investigation report and decide on next steps to be taken	Within 5 working days of receiving the Investigation report
4. Communicate Outcome	The Chairperson of the Board Audit Committee (or delegate) communicates steps taken pursuant to the Whistleblowing to the Whistleblower.	Within 2 working days of receiving decision of the Board Audit Committee.
5. Update MFC Board of Directors	The Chairperson of the Board Audit Committee, or such person designated by the Board Audit Committee, shall update the Board Members on whistleblowing matters investigated and the actions taken.	Next Board meeting

5.1 Initiation

(a) The Whistleblowing Form shall be submitted in writing, either via e-mail or post, using the Whistleblower Form (in **Annex 1**), which contains information on what needs to be reported. Except for anonymous reports, the Whistleblower may be contacted where clarification, further information or supporting documents are required for the assessment or investigation of the concern.

(b) Anonymous reports will be accepted and reviewed. However, the ability to investigate or act on anonymous reports may be limited where insufficient information is provided.

(c) The Corporate Governance department will maintain a record of all Whistleblowing Forms, including those raised anonymously. The Corporate Governance department will maintain a register of all concerns received, and send an acknowledgement of receipt of the Whistleblowing Form to the Whistleblowers, where their identities are provided. All Whistleblowing incidences received will be notified to the Board Audit Committee.

5.2 Assessment

(a) The Corporate Governance department will review the Whistleblowing Form and prepare a summary and a recommendation whether the reported incident warrants an Investigation. Corporate Governance department will submit the Whistleblowing Form, the summary and its recommendation to the Board Audit Committee ("Whistleblowing Report").

(b) The Board Audit Committee will review the Whistleblowing Report and decide on whether an Investigation is needed.

(c) When the Whistleblower's identity is not known, the likelihood of substantiating the allegation from the information provided and any relevant sources should be considered.

(a) All assessments and analysis are to be consistent and properly documented, with decisions and outcomes clearly communicated to the appropriate parties on a timely basis.

5.3 Investigation

(a) Should an Investigation be deemed necessary, Board Audit Committee to create an Investigation team consisting of 3 independent members who are not associated with the Whistleblowing incident. The Investigation team can consist of Employees, Board Members and/or independent advisors.

(b) The Board Audit Committee will assure the independence of the Investigation team in the performance of the Investigation. Any person with an actual or perceived conflict of interest in relation to a whistleblowing concern shall recuse him/herself from the assessment, investigation, review or decision-making process. The Investigation team is empowered with the appropriate authority and must have the integrity and competence to gather and document facts, while preventing leakage of information. MFC will provide adequate support, cooperation and access of information to the Investigation team.

(c) The parties to be involved in the Investigation would be determined by the Investigation team depending on the nature, extent, timeline and complexity of the case. Some possible parties may include the Whistleblower, subject of the Whistleblowing, witnesses, key staff, management, Board members and external parties.

(d) The Investigation process comprises establishing the scope of the Investigation, gathering of evidence, reporting on the findings and providing recommendations. The duration of the Investigation is dependent on the nature of the concern, evidence available and complexity of the case.

(e) The Investigation report will be reviewed by the Board Audit Committee. Where appropriate, external advice may be sought to assist in the Investigation and review of the Investigation report (including the findings and recommendations).

(f) The possible outcomes include:

(i) There are no grounds for the concern. Hence, there are no further actions required;

(ii) There are grounds for the concern. Disciplinary action may be taken in accordance with MFC disciplinary policies (e.g. reprimand, suspension and termination of employment). In addition, remedial measures will be taken to minimise recurrence; and

(iii) There may be grounds for a possible criminal offence. Legal advice may be sought on whether the matter should be referred to the relevant authority(ies) for the appropriate action. In all these circumstances, the whistleblower will be notified of the outcome accordingly.

(g) MFC will conduct investigations in a fair, objective and impartial manner. Persons who are the subject of a whistleblowing concern will, where appropriate, be given an opportunity to respond to the allegations.

(h) The chairperson of the Board Audit Committee (or his or her delegate) will inform the Whistleblower of the outcome of the Investigation. If a whistleblower is dissatisfied with the handling or outcome of an investigation, he/she may submit further information or request a review of the matter where there are reasonable grounds, including new evidence, material procedural concerns, or information that was not previously considered. The Board Audit Committee will consider the request and determine whether a further review or re-investigation is warranted.

5.4 Outcome

(a) In cases where there are no grounds for the concern, the Board Audit Committee will inform the Whistleblower of the outcome and close the case. Where there are grounds for the concern, and the complaint does not concern the CEO, the CEO shall ensure that the appropriate remedial and/or disciplinary measures are taken.

(b) Where appropriate, MFC may report matters to law enforcement agencies, regulators or other relevant authorities.

(c) Where the Whistleblowing matter is against the CEO, the Board Appointment & Nomination Committee and Chairman of the Board shall ensure the appropriate measures are taken.

(d) The Corporate Governance department will provide a final update to the Board Audit Committee upon closure of the Whistleblowing incident.

(e) The Chairperson of the Board Audit Committee, or such person designated by the Board Audit Committee, shall update the Board Members on Whistleblowing matters investigated and actions taken.

6. CONFIDENTIALITY AND PROTECTION

6.1 MFC respects the confidentiality of the Whistleblower and is committed to preserving confidentiality by keeping the report and case information secure to the extent possible and accessible only to designated persons. Information relating to whistleblowing concerns shall only be disclosed on a strict need-to-know basis.

6.2 The Board Audit Committee and Corporate Governance department shall ensure proper confidentiality safeguards of the filed Whistleblowing Form, while maintaining the confidentiality of those involved in the case.

6.3 If necessary or lawful circumstances dictate the disclosure of the Whistleblower's identity, MFC must seek the Whistleblower's consent.

6.4 The Corporate Governance department shall securely maintain records relating to Whistleblowing Forms submitted, investigations, findings and actions taken for six years from the date of the final update to the Audit Committee upon closure of the Whistleblowing incident.

6.5 MFC does not condone any reprisal, discrimination or harassment against Whistleblowers who report in good faith. MFC is committed to protecting Whistleblowers from threats to employment and any other threats of retaliatory action. Disciplinary action may be taken against those who retaliate, harass or discriminate against Whistleblowers.

For this purpose of this clause, "retaliation" may include dismissal, demotion, harassment, discrimination, victimisation, intimidation, adverse performance assessment, denial of opportunities, or any other detrimental treatment of a Whistleblower arising from the making of a report in good faith.

6.6 Any Whistleblower who believes that he/she has been subjected to retaliation or detrimental treatment under this Policy should report the matter immediately to the Board Audit Committee or Corporate Governance department.

7. PUBLICATION AND EMPLOYEE TRAINING

7.1 This Policy is made available to all Employees and interested parties on the MFC website.

7.2 This Policy shall be communicated to all staff when they join MFC. Refresher training will be provided from time to time.

8. CHANGES TO POLICY

MFC reserves the right to modify or change this Policy at any time. Please refer to our website from time to time for any changes and/or updates to our Policy.

This Whistleblowing Policy was last updated in June 2026.

APPENDIX 1

Montfort Care Whistleblower Form
Whistleblower's details *You may leave this section blank if you wish to remain anonymous. However, the ability to investigate or act on anonymous reports may be limited where insufficient information is provided*
Name, Designation, Department, Contact number and E-mail address *By providing your name and contact details, you consent to MFC contacting you if further clarification, information or assistance is required in connection with the assessment or investigation of the reported concern.*
Details of the Person you wish to report about
Name, Designation, Department, Contact number and E-mail address
Witness' details (If any)
Name, Designation, Department, Contact number and E-mail address
Concern *Describe the misconduct and how you know about it.*
1. What is the concern or misconduct being reported?
2. Who committed the misconduct?
3. When did the misconduct happen? Was it the first time the misconduct happened or has it been recurring?
4. When did you first notice the misconduct?
5. Where did the misconduct take place?
6. Have you approached the Person who you think has committed the misconduct ? If yes, what did he/she say?
7. Is there any evidence that you could provide us? If yes, please briefly describe.
8. Were other individuals involved? If yes, please tell us who they are.
9. Share other details which would assist MFC in the investigation?

10. Have you reported the misconduct internally or through any other channels? If yes, please say who and how you made the report.	
Date:	Signature:

How to submit the form?		
(a) Email to audit@montfortcare.org.sg	(b) Mail to our mailing address at Montfort Care Attention: Head of Corporate Governance, Montfort Care 624 Upper Bukit Timah Road Singapore 678212	