

**Bowls Singapore (BSG)
POLICY
WHISTLE-BLOWING POLICY**

1. Introduction

1.1 Singapore Bowls (BSG) is committed to a high standard of compliance with accounting, financial reporting, internal controls, auditing requirements, and any legislation relating thereto. In line with this commitment, this policy aims to provide an avenue for employees and external parties to raise concerns and offer them reassurance that they will be protected from reprisals or victimisation for whistle-blowing in good faith.

2. Definition

2.1 Whistle-blowing is defined as a deliberate, voluntary disclosure of individual or organisational malpractice by a person who has or has had privileged access to data, events, or information about an actual, suspected, or anticipated wrongdoing within or by BSG, that is within BSG's control.

2.2 **Whistle-blowing Governance Office (WBGO)** is in charge of the whistle-blowing process. The Board shall appoint the Audit Committee chair to assume this role. Where the concerns reported involve other Board members or key management, the Board will appoint two members of the Board (e.g. Audit Committee chair and other directors) to assume this role. Some of the responsibilities include:

- a. To ensure that sufficient inquiry is conducted into every concern received.
- b. The case is investigated by a qualified investigator who is independent of the area/function where the concern is alleged to have taken place.
- c. To recommend whether an external qualified investigator independent of the organisation is required.
- d. The action taken in response to the assessment/investigation is appropriate to the circumstances.
- e. There are adequate safeguards to protect the whistle-blower from reprisal, discrimination or harassment. A whistle-blower Protection Officer may be appointed to the task.
- f. To ensure the adequate measures are in place to protect the confidentiality of the whistle-blower and information about the case.

- 2.3 An **Investigator** is appointed by the Board at the advice of the WGGO. The Investigator:
- a. ensures investigations are conducted in an independent, diligent and unbiased manner;
 - b. regularly reports findings to the WBGGO, Board or Audit Committee (as appropriate);
 - c. must be independent, competent and refrain from discussing or disclosing confidential information under investigation. The investigation may include external parties with the appropriate competencies to assist in the investigation.

3. Relevant Persons And Reportable Incidents

- 3.1 Actual, suspected, or anticipated wrongdoings that were, or will be, committed by any of the following individuals (collectively referred to as “**Relevant Persons**”) may be reported under this policy:
- a. members of BSG Board;
 - b. BSG staff;
 - c. external parties who have business relationships with BSG including but not limited to athletes, parents, customers, suppliers, contractors, applicants for employment, and the general public.
- 3.2 Incidents that may be reported (“**Reportable Incidents**”) relate to misconduct or malpractice that have an adverse impact on BSG. Some examples include (but not limited to):
- a. financial malpractices or impropriety such as fraud, corruption, bribery, kickback, theft and concealment;
 - b. failure to comply with regulations, laws and ethical guidelines;
 - c. threats to health and safety in the work environment;
 - d. any form of criminal activity; and abuses of corporate resources.

However, grievances of a personal nature are not a whistle-blowing concern. This is usually handled by the respective head of department and/or the head of human resource.

- 3.3 The above mentioned Reportable Incidents must have been, or are expected to be, committed at BSG premises and/or during the conduct of the Relevant Person’s duties, employment or conduct of business with BSG.

4. Protection Against Reprisal And Confidentiality

- 4.1 Where any individual raises a concern or provides information of an actual, suspected, or anticipated Reportable Incident in good faith (“**Informant**”), such Informant shall be protected against any reprisal including termination of employment, retribution, or harassment under this policy, and any information provided by the Informant on a Reportable incident shall be treated in confidence.

- 4.1.1 **Confidentiality commitment:** BSG will keep the identity of the whistleblower and the content of the report confidential, accessible only to those who need to know for the purposes of assessment, investigation or legal compliance. Confidential records will be stored securely and access logged.
- 4.1.2 **Exceptions to confidentiality:** The WBGO may disclose information only where:
- a. required by law or a competent authority;
 - b. the whistleblower consents to disclosure;
 - c. disclosure is necessary for the investigation and the WBGO has taken reasonable steps to minimise identity exposure. Any disclosure will be limited to the minimum necessary.
- 4.2 Concerns and/or information provided anonymously will be given due consideration. The WBGO will document the reasons for accepting or declining to investigate anonymous reports and will apply the same confidentiality safeguards to any information received.
- 4.3 BSG will not include indemnity language or other clauses that could be interpreted as discouraging reporting. Disciplinary action will be taken against any person who retaliates against a whistleblower.

5. Procedures

- 5.1 If you wish to provide information of a Reportable Incident to BSG to notify BSG of the Reportable Incident, please use the Whistle-blower Report Form in Annex A.
- 5.2 Whistle-blower Report Form shall be addressed to bowlssg.whistleblow@gmail.com. The WBGO will treat all letters with the appropriate level of confidentiality.
- 5.3 By submitting a Whistle-blower Report Form, the Informant agrees that all information provided shall be sincere, accurate and without material omission. If the Informant agrees to make himself/herself available for discussions or clarification, he/she agrees to give full and frank disclosure on the matters discussed or clarified, and such discussions or clarifications shall be sincere, accurate and without material omission.
- 5.4 The WBGO shall review and provide an initial assessment of Whistle-blower Report Form to determine whether the concerns raised in a letter are valid and require follow-up action by the WBGO. This initial assessment will be made with due consideration to criteria as determined at the WBGO's sole and absolute discretion, which may (but not necessarily in any given case) include the following factors:
- a. seriousness of the matter(s) raised;
 - b. credibility of the information provided; and

- c. likelihood of confirming the matter(s) or information with the sources referred to by the Informant.
- 5.5 For the avoidance of doubt, the WBGO has sole and absolute discretion to disregard any Whistle-blower Report Form that it has determined raises invalid concerns, is not within the scope of this policy (as a Relevant Person and/or Reportable Incident), fails to provide Relevant Information in the Whistle-blower Report Form, or is frivolous, mischievous, or malicious.
- 5.6 Should the WBGO determine that a matter requires follow-up measures, the WBGO may in its sole and absolute discretion:
- a. direct BSG that an investigation is to be conducted;
 - b. recommend to BSG the appointment of an Investigator such as an external auditor or a solicitor;
 - c. recommend to BSG that the Singapore Police Force, Commercial Affairs Department, or any other relevant body, be notified, or directly notify such body; or
 - d. take any other action as it may deem fit.
- 5.7 In the event further information is sought from the Informant during the course of the investigation, the WBGO and/or Investigator are entitled (but are not obliged) to:
- a. contact the Informant;
 - b. organise or facilitate meetings with the Informant; and
 - c. require the parties involved to make written and/or face-to-face submissions to the WBGO or Investigator(s).
- 5.8 When the investigation is completed, the Investigator will report the findings to the Board for its necessary action. At this point, the WBGO may record that the matter has been concluded. Any recommendation made by the WBGO is not intended to be binding upon parties, and any final determination will be made solely by the Board of BSG or CEO of Singapore Sport, as necessary.
- 5.9 The Informant acknowledges that the decisions, recommendations, and actions of the WBGO is final and the Informant shall not dispute any such decision, recommendation and action, as the case may be. The Informant acknowledges that instead recourse shall be made to alternative channels such as the Singapore Police Force or the Commercial Affairs Department.
- 5.10 The WBGO shall not be liable to the Informant, a representative of the Informant, BSG, and any officer, employee, agent, or any other representative of BSG, for any damages, whether direct, indirect, consequential, reliance, exemplary or otherwise, and makes no express or implied warranties or other warranties arising under law, and hereby expressly disclaims all express or implied warranties or other warranties arising under law. The Informant and BSG hereby agree to jointly and severally indemnify the WBGO for any expenses, damages, loss and other amounts suffered by the WBGO.

6. Privacy Statement

- 6.1 In respect of any personal data (as defined in the Personal Data Protection Act 2012 of Singapore (“**PDPA**”)) that you may provide or that BSG may collect in connection with an investigation or the provision of services to you (including to facilitate membership application and approval) and to the extent that your consent is required under law, you agree and consent that BSG (together with our service providers and any third parties appointed by BSG on your behalf (including the WBGO and Investigator(s)) may collect, use, disclose and process such personal data for the purposes identified in our privacy policy, available on BSG’s website.
- 6.2 If you provide BSG with any personal data relating to a third party, by submitting such personal data to BSG, you represent that you have notified the third party of the terms of the PDPA and have obtained his/her consent thereto.

7. Changes To the Policy

- 7.1 BSG is committed to ensuring all policies are up-to-date and reflect current practices. Changes to this policy may be submitted by BSG Board for review and approval. Once a change has been approved, the policy will be updated and it will be posted on BSG website and be disseminated to all BSG members.

Whistle-Blower Report Form

Whistle-blower's details This section may be left blank if the whistle-blower wishes to remain anonymous	
Name, Designation, Contact Number, Email	
Can you be contacted for more information?	
Alleged Party's details	
Name, Designation, Contact Number, Email	
Witness (if any)	
Name, Designation, Contact Number, Email	
Concern/Complaint Describe the misconduct and how you have come to know about it	
1. What misconduct occurred?	
2. Who committed the misconduct?	
3. When did it happen? When did you notice it?	
4. Where did it happen?	
5. Have you approached the person? If yes, what did he/she say?	
6. Is there any evidence you can provide us?	
7. Were other people involved?	
8. Do you have any other details or information which would assist the investigation?	
9. Have you reported the incident internally or through other channels? If yes, to whom have you made the report?	
Date	Signature

Instruction:

Please submit this form to:
The Whistle-Blowing Governance Office
Bowls Singapore
Email address: bowlssg.whistleblow@gmail.com

Prepared by: Kelvin Kwek, Board Member
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