

CATHOLIC BUSINESS NETWORK (“CBN”) WHISTLEBLOWING POLICY



1. Introduction

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

2. Scope

- 2.1 This policy applies to all employees as well as to all external parties who have business relationships with CBN. These parties include customers, suppliers, contractors, applicants for employment, and the general public.

3. Definition

- 3.1 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 CBN that is within its ability to control.

4. Reportable Incidents

- 4.1 Below is a list of examples (though not exhaustive) of reportable incidents relating to CBN covered by this policy:

Concerns about the accounting, internal controls, or auditing matters;

- (i) Impropriety, corruption, acts of fraud, theft and/misuse of properties, assets, or resources;
- (ii) Conduct which is an offence or breach of law;
- (iii) Serious conflict of interest without disclosure;
- (iv) Breach of policies or code of conduct;
- (v) Concealing information about any of the above malpractice or misconduct;
- (vi) Any other serious improper conduct that may cause financial or nonfinancial loss to CBN or damage its reputation;
- (vii) Fraud against members or making fraudulent statements to the BOD, members of the public and government or state authorities;
- (viii) Manifestation of intention to mislead, deceive, coerce, or fraudulently influence any internal or external accountant or auditor in connection with the preparation, examination, audit or review of any financial statements or records of CBN.

5. Protection against Reprisal and Confidentiality

- 5.1 When raising concern or providing information about an actual, suspected, or anticipated wrongdoing, done in good faith; the individual, be it an employee or anyone else, he/she shall be protected against any reprisal such as employment termination, retribution, or harassment.
- 5.2 However, CBN will not condone any allegations which are frivolous, mischievous or malicious. Employees, found making such allegations, shall be subject to disciplinary action. Concern or information about an actual, suspected or anticipated wrongdoing as well as its source shall be treated with strictest confidence.
- 5.3 Exceptions to above include:
- (i) When CBN is under legal obligation to disclose such information provided;
 - (ii) When the information is already in the public domain;
 - (iii) When the information is given in strict confidence to legal or auditing professionals for the purpose of obtaining professional advice; and
 - (v) When the information is given to the Police for criminal investigation.

Concerns or information provided anonymously will still be given due consideration by CBN but will be investigated on their own merits.

6. Procedures

- 6.1 Concerns can be reported by completing the prescribed report form and submitting to cbn.auditcommittee@gmail.com.
- 6.2 The prescribed form will set out in detail the background and history of events as well as the reason(s) for concern.
- 6.3 Assessment of the concern or information shall be made with due consideration given to the following factors:
- (i) Seriousness of the issue raised;
 - (ii) Credibility of the concern or information; and
 - (iii) Likelihood of confirming the concern or information from the attributable sources
- 6.4 Depending on the nature of the concern raised or information provided, the investigation will be conducted, involving one or more of the following individuals or entities:
- (i) The Audit Committee
 - (ii) The External Auditor, and/or
 - (iii) The Police or Commercial Affairs Department.
- 6.5 The amount of contact between the whistle blower and the person(s) investigating the concern raised or information provided will be determined by the nature and clarity of the matter reported. Further information may be sought from the whistle blower during

the course of the investigation. When the investigation is completed, the investigating officer(s) will report the findings to the Audit Committee for its necessary action.

**CATHOLIC BUSINESS NETWORK
WHISTLEBLOWING REPORT FORM**

Whistle-Blower Report Form Whistle-blower's details

(Note: This section may be left blank if the whistle-blower wishes to remain anonymous)

Name:

Designation:

Name of Department:

Contact number:

E-mail address:

Can you be contacted for more information? Yes No

Alleged Party's details

Name:

Designation:

Name of Department:

Contact number:

E-mail address:

Witness' details (If any)

Name:

Designation:

Name of Department:

Contact number:

E-mail address:

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 and when did you notice it?**

 - 4. Where did it happen?**
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5. Have you approached the person? If yes, what did the person say?

6. Is there any evidence that you could provide us?

7. Were other people involved? If yes, who are they?

8. Do you have any other details or information which would assist us in the investigation?

9. Have you reported the incident internally or through any other channels? If yes, to whom have you made the report?

Date:

Signature:

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