

BEFC WHISTLEBLOWING POLICY

1.0 PURPOSE

This policy is created in order to meet the requirements/expectations of Guideline 2 on Conflict of Interest as defined in the Singapore Code of Governance for Charities and Institutions of a Public Character issued by The Charity Council, April 2017. The purpose of this policy is to:

- provide an avenue for whistle blowers (e.g., employees, members, or outside parties) to raise concerns about wrongdoing or malpractice within Bethany Evangelical Free Church (thereafter “church” or “BEFC”) which they have become aware of;
- provide reassurance that the whistle blowers will be protected from reprisals or victimization for whistle blowing made in good faith and without malice.

2.0 STATEMENT OF POLICY

The church is committed to the highest standards of quality, honesty, integrity, openness and accountability. In addition, we encourage, employees, members and outside parties with serious concerns to come forward to express those concerns.

Whistle blowers raising concerns in good faith can do so without fear of reprisal or victimisation. The church is committed to this policy. Whistle blowers who raise genuine concerns under this policy should not feel they are at risk of losing their job or suffering any form of retribution as a result. Provided they are acting in good faith, it does not matter if whistle blowers are mistaken or if there is an innocent explanation for their concerns.

3.0 RESPONSIBILITY AND AUTHORITY

1 st Level	Chairman of the Board	<ul style="list-style-type: none">• Overall responsible for the update, approval & execution of this policy.• Contact point for the whistle blowers who wish to raise their concerns.
2 nd Level	Secretary of the Board	<ul style="list-style-type: none">• Overall responsible for the update, approval & execution of this policy.• Contact point for the whistle blowers who wish to raise their concerns.
3 rd Level	Whistle Blowing Officer (WBO), i.e., the Treasurer of the Board	<ul style="list-style-type: none">• Responsible for execution of this policy.• Contact point for the whistle blowers who wish to raise their concerns.• Responsible to maintain a central register of all concerns received and submit an annual report to the Board setting out the numbers of concerns received, the outcome of each investigation conducted together with any action plan for improvement which may have put forward by the appointed investigation officers.

Refer to the Church's website for the identities of each of the individuals listed above.

4.0 SCOPE

This policy applies to all Board members, Board committee members, ministry leaders, as well as employees of the church.

What types of actions are covered by the policy?

This policy is intended to deal with serious or sensitive concerns about such as the following:

- Financial frauds and malpractice
- Unauthorised use of church money
- Corruption
- Unlawful acts which violate the laws on Anti Money Laundering (AML), PDPA etc
- A person abusing his/her position for any unauthorised use or for personal gain
- Non-adherence to major control policies (for example, removing of assets without proper approval)
- Deliberately conceal information tending to show any of the above.

What is not covered?

The following concerns will be dealt with through the Human Resource Committee's Grievance Handling Policy:

- A person being discriminated against because of their race, colour, religion, ethnic or national origin, disability, age, sex, home life, etc.
- Employees' complaints about their employment

The following concerns will be dealt with by the pastoral team or respective ministry leaders:

- Outside parties' complaints about our church ministries/services

5.0 PROCEDURE TO FOLLOW

STAGE 1 – Who to Raise a Concern to

You may approach the church-appointed Whistle Blowing Officer (WBO, i.e., the Treasurer of the Board) if you may be aware of any suspected misconduct within the Company.

If you feel unable to raise the matter with our appointed WBO for whatever reason, or are not satisfied with the outcome of initial investigation, you can communicate with the Secretary of the Board.

If the above channels have been followed and you still have concerns or if you feel that the matter is so serious that you cannot discuss it with any of the above, you can communicate directly with the Chairman of the Board.

STAGE 2 – How to Raise a Concern

It is best that you could provide the WBO with as much information as possible, including any relevant names, dates, documents, places and so on. You will have to show that there are good reasons for your concern.

The earlier you raise a concern, the easier it will probably be to take effective action.

STAGE 3 – How We Respond to Your Concerns

In dealing with your concerns under this Policy, the WBO has a responsibility to:

- Take concerns seriously
- Consider them fully and sympathetically
- Recognise that raising a concern can be a difficult experience for you and to offer support
- Investigate and resolve the matter as quickly as possible
- Ensure that you are informed of the outcome of the matter
- Ensure that there is no victimisation of you raising concerns
- Ensure that protection is offered if the concern comes with the legal definitions covered by established laws or legislation

The WBO together with a pastor or board member may request you to meet them during the investigation process. The amount of contact you have with them will depend on the nature of your concerns, the potential difficulties involved, and the clarity of the information you have provided. Meetings with the WBO and a pastor or board member will normally take place outside the church. You may be accompanied by a friend or colleague during the meeting.

They will keep your concerns confidential and will not reveal your name or position without your permission or unless they must do so by law.

You should expect a preliminary response within 7 working days from the date that you raise the matter to the WBO.

ADDITIONAL POINTS TO NOTE

If the concern later turns out not to be justified, but was raised in good faith and without malice, you can still expect support. However, if you have raised a concern that later turns out to be malicious or brought in bad faith, you will be warned or disciplined accordingly.

Any church member or employee who seeks to discourage a good-faith whistleblower from coming forward, or who criticises or victimises them after voicing a concern, will be dealt with accordingly, including disciplinary action.

STAGE 4 – Monitoring & Documenting Concerns

The WBO will maintain a record of concerns raised by the whistle blower (in the church's knowledge management system), including the investigation outcomes and areas of improvement (in a form which does not endanger confidentiality and where applicable, protect identity of the complainant).

STAGE 5– Periodic Reporting

The WBO will report the concerns received, outcome of each investigation conducted and action plans for improvement to the Board at an appropriate Board meeting.

Current as of 15 October 2025