



Introduction

Jurong Port is committed to a high standard of corporate governance and business ethics. In line with this commitment, this Whistle Blowing Policy (“this policy”) aims to provide an avenue to raise misconduct or malpractice concerns at an early stage and in the right way without fear of reprisal, detriment or adverse personal consequences; in good faith.

What to report

This policy provides a framework for managing reports of suspected incidents of malpractice which significantly impact Jurong Port and its operations. Incidents of malpractice which are reportable include, but are not limited to:

- Breach or failure to implement or comply with company policies or code of conduct
- Impropriety, corruption, acts of fraud, theft or misuse of company’s properties, assets or resources
- Criminal offences
- Abuse of power or authority
- Deliberate concealment of malpractice

How to make a report

To make a disclosure, the whistleblower is encouraged to contact Jurong Port via:

Email: whistleblower@jp.com.sg

The disclosure should contain as much detail as possible to enable a proper and thorough investigation of the allegations.

Identity of Whistleblower

The whistleblower is strongly encouraged to provide his/her name and contact details when making a disclosure to ensure a proper and thorough investigation and in the event the investigating team needs to liaise with the whistleblower for more information.

Confidentiality

If a whistleblower makes a disclosure pursuant to this policy, every reasonable effort will be made to keep the whistleblower’s identity confidential. In order not to jeopardise the investigation into the alleged malpractice, the whistleblower is expected to keep the disclosure and all details pertaining to it strictly confidential. Jurong Port will reasonably endeavour to inform the whistleblower if a referral to an external authority is about to or has taken place. A referral may be made without the whistleblowers’ knowledge or consent if Jurong Port considers it appropriate or if required by law.

Protected Disclosures

This policy is meant to protect genuine whistleblowers, and strictly forbids disclosures that are false, baseless, frivolous, malicious, reckless or for personal gain. An independent body within Jurong Port will address, and where necessary investigate, genuine whistle blowing disclosures. Jurong Port will take all reasonable steps to protect the whistleblower. If the disclosure was made in good faith, the Whistleblower can be rest assured that no action will be taken against him/her even if subsequent investigations revealed no wrongdoing.

Reminders

The making of false, baseless, frivolous, malicious or reckless disclosures and the abuse of this policy are prohibited, and should Jurong Port find that the Whistleblower had acted in such a manner, the whistleblower may be reported to the relevant authorities and may face legal consequences.

Frequently Asked Questions

Q: How much detail should I include in my disclosure?

A: The disclosure should contain as much detail as possible, including (not limited to):

- Name and contact details;
- Nature of the malpractice;
- Names of people allegedly involved;
- Names of any witnesses;
- Date, time and location of incident (including multiple occurrences);
- When the incident was first noticed;
- Details of any evidence you may have or know of;
- The value of any money or asset involved; and
- Frequency of occurrence.

Q: How long after I notice an irregularity, should I make a disclosure?

A: The earlier a disclosure is made, the faster it is for Jurong Port to ascertain all the facts and begin investigations.

Q: What are examples of malpractice incidents?

A: The examples of malpractice mentioned below are not exhaustive, and are intended to give a general indication of the kind of conduct which may be reportable.

Breach of law or policy

- Conduct or activities that may endanger the health, safety, security of persons or property (physical or otherwise);
- Activities in contravention of environmental laws;
- Breaches of confidentiality relating to sensitive or confidential information of Jurong Port, its customers or contractors; and
- Deliberate failure to comply with legal obligations and/or Jurong Port policies.

Fraud or corruption

- Deliberate error in the preparation, evaluation, review or audit of claims, bills and financial accounts; and
- Misuse and mismanagement of funds or other resources.

Bribery

- Where a Jurong Port employee solicits, gives, receives, promises or offers money, gift, loan, payment, employment, contract or commission in the course of work;
- Where a Jurong Port employee receives benefit (e.g. money) which influences their judgment or conduct in a position of trust; and
- Where a Jurong Port employee provides payment in order to persuade someone in a position of responsibility to betray that responsibility.

Collusion

- When a Jurong Port employee works with another party (internal or external) to deliberately misuse funds and/or resources of Jurong Port or the company for their personal benefit.

Criminal offences

- Activities that are punishable offences under the Penal Code including theft, homicide and cheating.

Deliberate concealment of malpractice

- Not observing proper procedures for procurement and revenue tendering;
- Aiding and abetting a reportable wrongdoing through suppression or concealment of any information; and
- Intentional provision of incorrect information to public bodies.

Others

- Improper practices/activities which may cause financial or non-financial loss to the company, or damage the company's reputation.

Q: May I remain anonymous?

A: Anonymous disclosures are very difficult to act upon as there may be insufficient evidence to substantiate the allegations. A thorough investigation will be hindered if the investigator cannot obtain further information from you, give you feedback or ascertain whether your disclosure was made in good faith. As such you are encouraged to provide your name and contact details.

Q: How will my identity and contact details be used?

A: Your identity is protected as it will be kept in confidence by Jurong Port, unless you choose to reveal it. Every effort will be made not to reveal the identity to the extent feasible and permissible under the law.

Providing your details allows the investigation team to keep you updated about the progress of investigation. In addition, you may need to be contacted for additional information or verification of initial report.

There may be circumstances in which it will be necessary to disclose the Whistle-blower's identity. These circumstances include but not limited to:

- Where Jurong Port is legally obliged to do so;
- Where the identity information is already in the public domain;
- On a strictly confidential basis to qualified professionals such as a lawyer or an accountant for the purposes of obtaining advice; or
- To the police or as otherwise required under the law, e.g. anti-money-laundering requirements

Q: What if I suspect something is wrong, but I am not sure?

A: Most cases reported are uncovered through tips from honest and caring people who are not fully certain of the facts. That is perfectly all right. We do not expect you to know every detail. Reporting what you know is sufficient.

Q: Why do we have to disclose malpractice incidences to Jurong Port?

A: You are encouraged to report malpractice directly to Jurong Port so it can be investigated and addressed promptly. Jurong Port is firmly committed to upholding a high level of corporate ethics.

Q: How will my disclosure be handled?

A: All disclosures will be taken seriously according to the following procedures:

- If you have a personal interest in the matter disclosed, please inform us at the outset;
- Disclosures under this policy will be acknowledged in writing within 5 working days, confirming that the matter will be investigated and a representative from Jurong Port will contact you within 14 working days;
- Jurong Port will manage the disclosure and investigations;
- You may be asked to provide more information during the course of the investigation. Any follow up action will depend on the nature of the disclosure and the quality of information provided; and
- Your disclosure may be resolved without further investigation if it is found that the evidence is insufficient or the malpractice is not serious enough.

Q: Will I be involved after I report an incident?

A: You are not required to be involved after you have reported it. However, if you have left your details with us, you will be informed of whether your disclosure will be reviewed and whether investigations will be initiated; you may be contacted to verify details or provide more information; and Jurong Port will endeavour to inform you if a referral to an external authority is about to or has taken place, although such a referral may be made without your knowledge or consent if Jurong Port considers it appropriate. If you have any new or additional information, or would like to make any amendments to your report, you may do so using the same disclosure procedures as explained in the policy.

Q: Do I get any rewards for reporting misconduct?

A: No, there is no reward for reporting alleged malpractices.

Q: Will there be an investigation after each report is made?

A: Whether there is an investigation depends on a number of factors such as the information provided, details, and documentation. Jurong Port will decide on the action required when all the facts are investigated and analysed.