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## The Astronauts Collective

# WHISTLEBLOWING POLICY

### 1. Aim

**1.1** The Astronauts Collective (“**TAC**”) is committed to upholding the highest standards of ethics and governance in the course of its work and operations.

**1.2** This Whistleblowing Policy (“**Policy**”) provides a confidential and secure channel for the reporting of any observed or suspected misconduct or wrongdoing raised in good faith.

**1.3** The Policy shall set out the process for any reports to be made to the TAC’s Executive Director(s) or directly to the Chair of TAC’s Board and shall seek to ensure that any person making a report may do so without fear of retaliation, reprisal, discrimination, or adverse consequences.

### 2. Scope

**2.1** This Policy applies to all persons, including but not limited to TAC’s volunteers, Youth Guidance Associates (each a “**YGA**”), partners, vendors, donors, youth beneficiaries and their families, and members of the public.

**2.2** This Policy encourages any stakeholders of TAC or external parties to come forward to report any actual or suspected fraud, misconduct, or wrongdoings (each a “reportable matter”) as soon as they become aware of it. The Policy is also designed to protect whistleblowers acting in good faith, and promote a culture of transparency, accountability, and integrity across all of TAC’s activities and operations.

**2.3** Examples of reportable matters include, but are not limited to:

- a) Fraud or theft
- b) Bribery and corruption
- c) Conflict of interest violations
- d) Financial misconduct or any fraudulent accounting practices
- e) Any non-compliance with laws and regulations
- f) Any non-compliances with any TAC policies or procedures, and our Code of Conduct
- g) Unethical or improper conduct, including discrimination, harassment, or sexual misconduct.
- h) Health, safety, security, and environmental matters.

**2.4** This Policy is not intended to address personal grievances, employment-related disputes, or complaints that do not involve misconduct or wrongdoing, which should instead be raised through the appropriate grievance or complaints procedures, where applicable.

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## 3. Roles and Responsibilities

**3.1** TAC will appoint a Designated Safeguarding Lead (“DSL”) responsible for receiving whistleblowing and safeguarding-related reports, maintaining appropriate records, coordinating follow-up actions, and escalating matters to the Executive Director(s) and/or Board of Directors as appropriate. The table list of appointed DSL(s) is included in Annex A below.

### 3.2 Executive Director(s)

The Executive Director(s) provide senior oversight of whistleblowing matters, make decisions on escalation, investigation, and external reporting, and escalate matters to the Board of Directors where required.

### 3.3 Board of Directors

The Board of Directors provides independent oversight of whistleblowing matters, particularly where reports involve senior management or present significant governance or safeguarding risks.

## 4. Safeguards & Confidentiality

**4.1** TAC strictly prohibits any form of reprisal, victimisation, or harassment against a Whistleblower who reports a concern in good faith. This protection applies to any participation in TAC activities and any engagement with TAC.

**4.2** If a Whistleblower believes they have experienced reprisal or victimisation as a result of their report, they may report this directly to:

- a) TAC Executive Director(s); or
- b) the TAC Board of Directors, if the Executive Director(s) is or are implicated.

**4.3** To the fullest extent legally permissible, TAC is committed to use best endeavours to protect the identity of the Whistleblower. Disclosure may occur only where:

- a) Required by law;
- b) Reasonably necessary for the investigation of the reportable matter;
- c) Required for obtaining professional or legal advice; or
- d) Required for reporting to relevant authorities to protect individuals or comply with any of TAC’s legal obligations.

**4.4** TAC will assess anonymous reports by taking into account the seriousness of the issue, credibility of the information, and likelihood of verification. The Whistleblower is encouraged to provide their name and contact information as investigations might be hindered if we are unable to follow up with the Whistleblower for clarification.

**4.5** No action will be taken against Whistleblowers who make unconfirmed reports in good faith. However, reports that are made maliciously, frivolously, knowingly false, or for personal gain may result in disciplinary action and/or further legal action taken against the Whistleblower.

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## 5. Reporting Mechanisms

**5.1** Any person may submit a report to TAC via the following channels:

By email: [incident@hellotac.org](mailto:incident@hellotac.org).

By post: Attention to DSL & Executive Directors, The Astronauts Collective Ltd, ITE College Central, 2 Ang Mo Kio Drive, S(567720)

5.1.1 Any report to TAC via the aforementioned channels will be accessible to the DSL and the Executive Director(s). Access is restricted to authorised personnel to preserve confidentiality, independence, and proper handling of reports.

**5.2** Should the report concern, implicate, or involve TAC's Executive Director(s) or DSL, the whistleblower may write directly to the Board of Directors:

By email: [boardofdirectors@hellotac.org](mailto:boardofdirectors@hellotac.org)

By post: Attention to Board of Directors, The Astronauts Collective Ltd, ITE College Central, 2 Ang Mo Kio Drive, S(567720)

**5.3** Reports should be as detailed as possible and include, where available:

- a) The Whistleblower's name and contact details;
- b) Your relationship with the TAC (if any);
- c) Names of individuals involved;
- d) Details of the reportable matter;
- e) Whether any member of TAC has been notified;
- f) Dates, locations, and nature of the incident;
- g) Relevant supporting evidence; and
- h) Any other pertinent information.

**5.4** All reports will be documented and retained in accordance with TAC's data retention policies and governance requirements.

## 6. Handling, Assessment, and Investigation of Reports

**6.1** All reports will be assessed promptly and objectively. Depending on the nature and seriousness of the reportable matter, TAC may take one of more of the following measures/steps, which are not intended to be exhaustive:

- a) Conducting an initial preliminary assessment to determine if the report fall within the scope of this Policy and whether any immediate action is required (including any safeguarding measures);
- b) Conducting an internal review or fact-finding exercise;
- c) Appointing a suitably qualified person or setting up an independent committee to investigate the reportable matter;
- d) Implementing interim measures, where appropriate, to protect individuals, preserve evidence, or manage any associated risks identified while the reportable matter is under review;

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- e) Seek professional or legal advice to assist with the assessment or investigation; and/or
  - f) Refer the matter to the relevant authorities, where required by law or where there is a risk to the safety or welfare of any individual.

**6.2** TAC will take reasonable steps to ensure that any investigation is conducted fairly, objectively and independently, and without conflicts of interest. TAC will handle the entire process or investigation with sensitivity, particularly where youth beneficiaries or any vulnerable persons are involved.

**6.2.1** Where a report concerns, implicates, or relates to the DSL, that individual shall not participate in the assessment, investigation, or handling of the matter. In such cases, the report shall be handled directly by the Executive Director(s) and/or escalated to the Board of Directors, as appropriate.

**6.3** TAC will take all reasonable and material steps during an investigation to document and record all key findings and decisions in accordance with TAC's governance and data protection policies

**6.4** Where appropriate and practicable, TAC may provide the Whistleblower with general updates on the status of the matter but the level of information shared may be limited by confidentiality, safeguarding, privacy, or legal considerations.

**6.5** Where wrongdoing is substantiated, TAC will take reasonable and appropriate corrective, safeguarding, and disciplinary action, which may include any improvement to our policies, training, or remedial measures. Due to confidentiality, privacy, or legal considerations, TAC may not always be able to disclose full details of the investigation process or outcomes to the Whistleblower or other parties.

## 7. Good Faith Reporting

**7.1** Whistleblowers are expected to act in good faith and provide information that is accurate to the best of their knowledge. Reports made honestly, even if unsubstantiated, will not result in adverse consequences against the Whistleblower. However, reports made maliciously, frivolously, or with knowledge that they are false may result in disciplinary action or further legal action being taken.

**7.1.1** This Policy is not intended to discourage reports made on reasonable suspicion, even if full/adequate evidence is not available.

## 8. Oversight and Review

**8.1** TAC's Board of Directors provides oversight of this Policy and the handling of whistleblowing matters.

**8.2** This Policy will be reviewed every year to ensure that it remains relevant, effective, and aligned with good governance practices and applicable laws.

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Annex A - List of DSL(s)

<b>S/N</b>	<b>Date of Appointment</b>	<b>Name</b>	<b>Designation</b>
1	4 February 2026	Kalaiarasu Lavanya Rini	Corporate Manager