



Whistleblowing Policy

POLICY EXPLANATIONS (The ‘What’)

1.1 Purpose of the policy

1.1.1 Mission Aviation Fellowship and its subsidiaries (“MAFI”) is an international organisation that connects its Christian identity with practical action, through our core values of impact, witness, excellence, partnership, stewardship and care.

1.1.2 MAFI is committed to ensuring that:

- we comply with all relevant laws and regulations;
- we adhere to the highest standards of conduct and ethical behaviour;
- we maintain organisational standards and our reputation by the provision of fair, effective and transparent processes;
- we promote and support a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

1.1.3 People who have a working relationship with MAFI are often the first to realise that there may be something wrong. However, they may not speak up for fear of appearing disloyal or they may be concerned about being victimised or of negative consequences for reporting wrongdoing.

1.1.4 The purpose of this Whistleblowing Policy (‘policy’) is to provide a clear, convenient and safe reporting mechanism to enable the disclosure of wrongdoing without fear of reprisal or negative consequences.

1.1.5 In this policy the person that discloses a wrongdoing is termed a “Whistleblower”.

1.2 Who the policy applies to (who can make a disclosure under the policy)

1.2.1 Disclosures under this policy can be made by MAFI company directors, office holders, executive management, employees, associates, representatives, implementing partners, contractors or suppliers, whether national or international, seconded or volunteer, whether based in programmes, support offices or other locations, whether current or former, and includes the relatives or dependents of such people.

1.2.2 MAFI encourages the reporting of information related to actual or suspected issues of wrongdoing or misconduct and is committed to fostering a safe culture to speak up in and providing protections when reporting is undertaken. This policy is supported by clear process to ensure the safety of the Whistleblower and the transparency of steps and outcomes and supports the legal protections provided by whistleblowing laws.

1.3 Matters the policy applies to (disclosures covered by this policy)

1.3.1 This policy and relevant whistleblowing laws that provide protection to someone who reports wrongdoing, only apply to certain types of disclosures. These disclosures are called ‘qualifying disclosures’.

1.3.2 Qualifying disclosures involve information that the discloser has reasonable grounds to suspect concerns of misconduct, or an improper set of circumstances.



1.3.3 Qualifying disclosures are generally serious and far-reaching in nature and may include (but are not limited to) the following categories:

- a) criminal offences, including acts of fraud or bribery;
- b) failure to comply with the law;
- c) miscarriages of justice;
- d) endangering someone's health and safety;
- e) damage to the environment;
- f) any breach of the MAFI Code of Conduct
- g) a danger to the public or the financial system; or
- h) covering up of any act in the above.

1.3.4 When making a disclosure, The Whistleblower will be expected to have reasonable grounds to suspect the information disclosed is true but will not be subject to a penalty if the information turns out to be incorrect. The Whistleblower must not make a report that they know is not true or is misleading. There may also be legal consequences if the Whistleblower makes a knowingly false report.

1.4 Matters the policy does not apply to (disclosures not covered by this policy)

1.4.1 This policy does not apply to a disclosure about a personal work-related grievance. These relate to the discloser's current or former employment with MAFI and might have implications for the discloser personally.

1.4.2 Personal work-related grievances include grievances such as interpersonal conflicts, decisions about promotions and decisions that do not involve a breach of workplace laws or terms and conditions of employment. A personal work-related grievance may still qualify for protection under the whistleblowing laws and this policy if it also contains information about wrongdoing that is a qualifying disclosure as set out in 1.3.3.

1.4.3 MAFI has a grievance resolution procedure that is designed to cover workplace grievance matters including discrimination or workplace bullying or harassment. They It also cover any matters that you may wish to raise in relation to your work environment or decisions directly affecting your employment. MAFI's grievance policy and procedures are set out in MAFI staff handbooks.

1.4.4 This policy is separate from MAFI's Safety Management System and other reporting mechanisms. It does not replace:

- a) organisational procedures for reporting of safety hazards, incidents or accidents. To disclose those kinds of incidents, please refer to MAFI's Mantis CGR (Corporate Governance Risk) reporting system;
- b) standard complaint mechanisms for customers; or
- c) the exercise of rights under the terms of their contract by contractors and suppliers.



POLICY PROCEDURES (The 'How')

1.5 How to make a disclosure (what does it need to include?)

1.5.1 In order for a disclosure to be investigated, it must contain enough information to form a reasonable basis for investigation. It is important that the Whistleblower provides as much information as possible. This includes any known details about the event/s underlying the disclosure such as:

- a) the date, time and location of the event/s;
- b) the name of person/s involved;
- c) any possible witnesses to the event/s; and
- d) any evidence of the event/s (e.g. documents, emails).

The Whistleblower should also include any steps already taken to report the matter elsewhere or to resolve the concern.

1.5.2 Anonymity

The Whistleblower is encouraged to identify themselves when making a disclosure. Qualifying disclosures can be made anonymously and still be protected by this policy and by Whistleblowing laws. However, anonymous disclosures may have significant limitations. MAFI will initiate an investigation based on the information provided, and anonymity may limit the investigation. Whether the MAFI Whistleblower self-identifies or wishes to remain anonymous, MAFI is committed to the disclosure being treated in confidence. The Whistleblower may choose to remain anonymous when making a protected disclosure. If the disclosure is made anonymously, this will not be overridden unless by due process of law. Reporting conduct anonymously will limit the ability to provide investigation updates and findings to the Whistleblower.

1.6 Who can receive a disclosure (where do you make it?)

1.6.1 Disclosures may be made verbally, in writing or securely online and received either via an internal or external reporting avenue. They can be anonymous, or the discloser may identify themselves. In all cases, disclosers can expect complete confidentiality.

1.6.2 The Whistleblowing Protection Officer (WPO) will receive, register and forward the disclosure to the Whistleblowing Management Team (WBMT) which comprise of Chief Human Resources Officer and MAFI's in-house Lawyer). The WBMT will review the disclosure to determine if it is a qualifying disclosure and the appropriate way to investigate. The following reporting avenues are available.

1.6.3 If the matter relates to any member of the Executive Leadership Team or a trustee/director of MAFI, the WPO has the authority to report the matter directly to the Chair of the MAF International Board.

1.6.4 Reporting can be made to the Whistleblowing Protection Officer by:

Email: whistleblowing@mafint.org

Post: Whistleblowing Protection Officer

MAFI International

P. O. Box 1099

Cairns QLD 4870

AUSTRALIA



or

Whistleblowing Protection Officer
MAFI International Operations Centre
Ashford
Kent TN24 8DH
UK

Internal disclosures can also be made and received by a member of the Executive Leadership Team, Operations Leadership Team, a MAFI Company Director or Board member or another senior manager.

1.6.5 Reporting can also be made to:

Board: To the Chair of the Board of Mission Aviation Fellowship International:

boardchair@mafint.org

Government agencies: The Charity Commission in the UK or ASIC or ACNC in Australia.

External auditors acting on behalf of the Whistleblower:

MAFI external auditors:

Mazars LLP
6 Sutton Plaza
Sutton Court Road
Sutton
Surrey SM1 4FS
UK

Tel: +44 (0) 20 86 61 18 26

nicola.wakefield@mazars.co.uk.

1.6.6 In the case of a disclosure made to WPO or directly to MAFI officers or senior managers, it will be forwarded to the WBMT within 48 hours of receipt.

1.7 Legal protections for disclosers and practical support provided by MAFI

If the Whistleblower qualifies for protection by making a qualified disclosure, legal protections and practical supports are available.

1.7.1 Identity protection

- a) The identity of the Whistleblower will remain confidential unless the Whistleblower provides consent for it to be revealed or unless the law allows or requires it to be revealed.
- b) During the investigation, it may be necessary to share some details with other MAFI personnel, external parties involved in the investigation and, if required, government agencies. When external reporting to regulatory bodies or for the purpose of seeking legal advice is necessary, MAFI may reveal the substance of a report but not the identity of the Whistleblower.



- c) MAFI will take reasonable precautions to securely store any records relating to a disclosure and to restrict access to only those involved in handling and investigating the disclosure.

1.7.2 Protection from detrimental acts and omissions

- a) As a result of the Whistleblower's disclosure, the Whistleblower will be protected from detriment by MAFI through any act or any deliberate failure to act, will not be threatened or harmed, will not be disadvantaged in employment status, dismissed, harassed, or intimidated.
- b) MAFI will not tolerate any retaliatory action or other detrimental conduct against the Whistleblower by MAFI representatives.
Any retaliatory action for a disclosure made under this policy will be treated as serious misconduct by the perpetrator. It may result in disciplinary action, including dismissal. In circumstances where the action is illegal, MAFI will notify the police.
- c) If the Whistleblower suffers loss, damage or injury as a result of making their disclosure under this policy and MAFI has failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct, the Whistleblower may be entitled to seek compensation under the whistleblowing laws.
- d) For more information on protections, the Whistleblower is encouraged to seek independent legal advice.

1.7.3 Civil, criminal and administrative liability protection

- a) The Whistleblower is protected from any of the following in relation to their disclosure, provided it is a qualifying disclosure
 - i. civil liability (e.g. any legal action for breach of an employment contract, duty of confidentiality or another contractual obligation);
 - ii. criminal liability (e.g. attempted prosecution for unlawfully releasing information, or other use of the disclosure in a prosecution and
 - iii. administrative liability (e.g. disciplinary action for making the disclosure).
- b) The Whistleblower is not granted immunity for any misconduct they have engaged in that is revealed in their disclosure. The Whistleblower is not protected from consequences arising from their own involvement in any wrongdoing.

1.8 Handling and investigating a disclosure

1.8.1 The attached Whistleblowing Policy Reporting Framework flow chart sets out in broad terms the way a disclosure will be handled and investigated.

1.8.2 If the disclosure is determined as a non-qualified disclosure the WBMT will:

- a) advise the Whistleblower of this decision; and
- b) where warranted recommend and/or instigate resolution through other procedures, processes or reporting systems (Complaints, Safeguarding, Grievance, Non-Harassment and Anti Bullying, Financial Crimes, Health & Safety Policies or Quality, Safety & Security reporting systems).

1.8.3 Alternatively, if the disclosure is assessed to be a qualifying one, the WBMT will appoint a whistleblowing investigator and develop an Investigation Plan.

- a) Following such appointment and throughout the investigation, the Whistleblower will be provided with updates of progress, as appropriate; and
- b) report the disclosure to the Executive Leadership Team and Board of Trustees.



- 1.8.4 A whistleblowing investigator may be internally or externally appointed. If the whistleblowing investigator is internally appointed, they must be independent of line management in the area affected by the disclosure
- 1.8.5 Once an investigation is commenced, the whistleblowing investigator will:
- a) contact the Whistleblower (if possible), advising that they have been appointed to conduct an investigation;
 - b) if required, seek further information from the Whistleblower or other persons necessary to form a proper view;
 - c) investigate the disclosure according to the Investigation Plan or any departure from it deemed reasonably necessary by an investigator; and
 - d) provide a written report of their findings to the Whistleblowing Committee.
- 1.8.6 At the conclusion of the investigation, the WBMT will prepare a written report outlining:
- a) a summary of the investigator's findings;
 - b) a determination as to whether the disclosure has been substantiated or otherwise;
 - c) the action that will be taken to address the findings (which may include disciplinary action and dismissal, external reporting and/or taking steps to address any internal wrongdoing); and
 - d) where possible and appropriate, having regard to MAFI's privacy and confidentiality obligations, inform the Whistleblower of the final outcome of the matter.
 - e) The WPO will inform the Whistleblower of the outcome of the disclosure.
- 1.8.7 Where an investigation does not support the disclosure, the fact that the investigation has been carried out, the results of the investigation and the identity of anyone included in the investigation must be kept confidential.

1.9 Ensuring fair treatment of individuals mentioned in a disclosure

- 1.9.1 MAFI recognises that any individuals who are under suspicion because of the disclosure will be significantly impacted and may need support during and after the investigation.
- 1.9.2 MAFI will take reasonable steps to treat fairly any person who is under suspicion, particularly during the investigation. If needed, an independent senior manager may be appointed to provide support.
- 1.9.3 If any preliminary assessment of the disclosure indicates that the suspicion is baseless or unfounded, then the discloser will be informed and the allegations against the subject of the disclosure will not be pursued. In this case the WBMT will decide whether the person named in the disclosure should be informed that a suspicion was raised and found to be untrue. This decision will be based on a desire to preserve the integrity of the individual and to protect the discloser where it is an honest disclosure.

1.10 Ensuring the policy is easily accessible

- 1.10.1 A whistleblowing notice is posted on MAFI's website www.mafint.org/whistleblowing-policy together with information on how to make a whistleblowing disclosure.
- 1.10.2 A full copy of the policy, together with whistleblowing awareness and training is provided to all staff during orientation and role related induction.



1.10.3 A full copy of the policy is also available through the website and is posted on MAFI's intranet found on SharePoint (staff only). A summary of the policy is publicly shared in employee areas in all offices and programmes.

1.10.4 Copies of this policy have been emailed to MAFI's auditors, all directors, other officers and senior managers, and all senior managers have been trained on their responsibilities under the policy.

1.11 Roles and Responsibilities

Whistleblower:

- Provides a report with verifiable information of improper, illegal or corrupt conduct via any of the reporting avenues in clause 1.6.

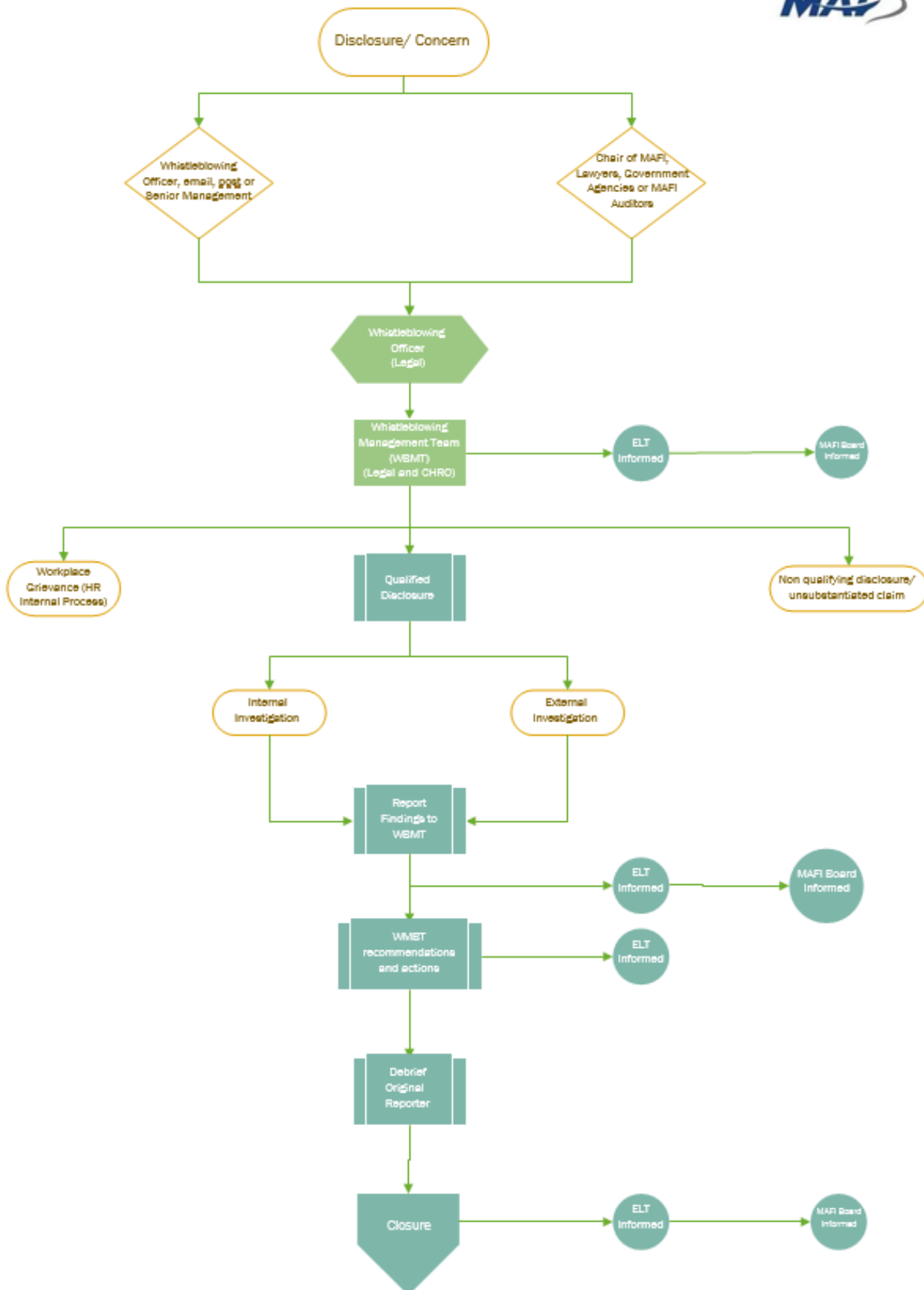
Whistleblowing Protection Officer (WPO):

- Receives whistleblowing reports
- Protects the confidentiality of the Whistleblower's identity
- Works with Whistleblower and report recipients to manage MAFI's response to whistleblowing reports
- Member of the WBMT on whistleblowing reports
- Facilitates communication and awareness of this policy and related processes to all staff
- Ensure protection is afforded to the Whistleblower

Whistleblowing Management Team (WBMT):

- Receives whistleblowing reports from WPO
- Reviews the whistleblowing report and determines if it is a qualifying disclosure, workplace grievance or disqualified disclosure with the appropriate action
- Determines the scope and appropriate investigation and appoints the whistleblowing investigator
- Keeps the ELT informed
- Receives the investigation report and recommends actions

Whistleblowing Policy Reporting Framework



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