



WHISTLE BLOWING POLICY

This policy aims to inform and direct any person to report evidence of malpractices and allegations of misconduct in a confidential manner. It allows any person to raise concerns they feel unable to direct to their line manager and to report them in a confidential or anonymous manner without fear of retaliation and in the knowledge that it will be taken seriously and investigated.

1. Scope

This policy is for any person working with or for the All Out Africa Foundation, this includes; - employees, consultants, contractors, partners, volunteers, interns, trustees. Additionally, this policy is available as a reporting mechanism to all beneficiaries, donors, sponsors, visitors, contractors and partners of AOAF. It encourages disclosures to be made in the public interest without restriction or repercussion.

2. Definitions

Misconduct – conduct that constitutes a criminal offence, failure to comply with legal and regulatory obligations, miscarriage of justice, health and safety danger, environmental risk or a concealment of any of these. Failure to comply with AOAF policy or breaches of the AOAF Code of Conduct may also constitute misconduct.

3. Policy

This policy is intended to address matters of a serious nature relating to misconduct by AOAF or its employees and associates. AOAF encourages any misconduct to be reported directly to the Board Member that heads the Ethics Committee as below. AOAF recognises the Eswatini Anti-Corruption Commission (<http://acc.gov.sz/>) operated by a third-party vendor, for anyone to access by email or phone twenty-four hours of the day, as an external mechanism to use for reporting any allegations of misconduct. An allegation must be made in good faith and not from personal motives. All allegations will be rigorously investigated.

AOAF will take appropriate action where claims of unlawful or unethical behaviour are substantiated. Confidentiality with respect to the identity of the Whistleblower and the information revealed will be maintained as is fully practicable, but subject to overriding legal requirements. AOAF gives its assurance that no whistleblower who makes a bona fide report under this Policy will be subjected to any detriment by AOAF as a result.

3.1 Allegations covered; -



- Dishonesty, fraud or corruption;
- Instances of bribery or suspected terrorist engagement or involvement;
- Illegal acts (e.g. theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of law);
- Unethical actions (e.g. dishonestly altering company records, engaging in questionable accounting practices or wilfully breaching the organisation's Code of Conduct or Policies);
- Actions that are potentially damaging to the organisation or dangerous to individuals connected with it (e.g. unsafe work practices, substantial wasting of resources);
- Actions likely to cause financial loss or damage to the reputation or be otherwise detrimental to organisational interests;
- Any other kind of serious impropriety.

To report an allegation by email, you should email the Head of the AOAF Ethics Committee rols@alloutafrica.com or call +268 25283423

An allegation should contain as much information as possible; - the name of persons involved, dates, times, locations, facts relevant to urgency, documentation, witnesses and any supporting evidence.

3.2 Investigation;

All allegations of misconduct should be promptly acknowledged and recorded by the Chair of the Ethics Committee or independent third party as appropriate.

Allegations will be consistently and fairly investigated. The Chair of the AOAF Ethics Committee will appoint an appropriate individual to undertake the investigation. Any individual who has been implicated will be informed, as appropriate, of the investigation and given the opportunity to provide evidence. All investigations will be confidentially documented and shared as appropriate with AOAF Senior Leadership and Board Members, so that the necessary corrective action can be taken. Upon conclusion of the investigation the reporter will be informed that the process has been followed and completed. Should the matter concern the Chair of the Ethics Committee it should be directly reported to the Chairman of the Board by e-mail kim@alloutafrica.org

3.3 Allegations of misconduct:

Matters of discrimination, bullying or harassment, perceived unfair treatment by a line manager, complaints about the work environment, issues concerning pay or benefits. These will be handled by the AOAF Manager. Only if a person does not believe these



allegations have been fully investigated should they then be submitted through the Whistleblowing procedure.

3.4 Training & Awareness:

All employees will receive information and training that will inform and direct them to this policy and how to follow the Whistleblowing procedure. External partners, contractors, consultants, supporters and beneficiaries can access this via our website.

4. Non-compliance

Appropriate disciplinary action will be taken against any employee who violates this policy e.g. by violating a whistle-blower's anonymity or engaging in retaliation against a whistle-blower or where a disclosure was made in bad faith.

If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another person, this will constitute misconduct and will be dealt with in accordance with the terms of AOAF's Disciplinary Policy.

5. Reporting and Monitoring

The investigation report will contain a clear description of the alleged incident or issues, corrective action already taken or advised, an assessment of potential risk to the organisation and proposed mitigation, a conclusion and further implications or reporting to statutory authorities.

Confidentiality with respect to the identity of the whistle-blower, the information revealed, and all evidence supplied will be maintained fully practicable within the parameters of Data Protection Regulations.

The number of whistleblowing cases will be reported by the Director of Ethics to the Board.

6. External

AOAF would expect that in almost all cases, raising concerns internally would be the most appropriate action. However, further recourse can be sought from the Coordinating Authority of Non-Governmental Organisations (CANGO) Eswatini <https://cangoeswatini.weebly.com/contact.html> via email cango@cango.org.sz or phone +268 2404 4721/9283