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Whistleblower Policy

Purpose

A Jesus Mission requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable employees and volunteers of the Organization to report any action or suspected action taken within the Organization that is illegal, fraudulent or in violation of any adopted policy of the Organization, to a source within the Organization before turning to outside parties for resolution. This policy applies to any matter which is related to the Organization's business and does not relate to private acts of an individual not connected to the business of *A Jesus Mission*. This policy is intended to supplement but not replace the Organization's unlawful harassment and discrimination policies, "open door policy" and/or any other grievance procedure, and any applicable state and federal laws governing whistleblowing applicable to nonprofit and charitable organizations.

Policy

1.1 Reporting in Good Faith

All employees and volunteers of the Organization are encouraged to report any action or suspected action taken within the Organization that is illegal, fraudulent, or in violation of any adopted policy of the Organization. Anyone reporting a Violation must act in good faith, without malice to the Organization or any individual in the Organization, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. Any report which the complainant has made maliciously or any report which the complainant has good reason to believe is false will be viewed as a serious disciplinary offense.

1.2 No Retaliation

No punishment – including firing, demotion, suspension, harassment, failure to consider the individual for promotion, or any other kind of discrimination, retaliation, or adverse employment or volunteer consequences – shall be inflicted on an employee or volunteer who, in good faith, reports a Violation or cooperates in the investigation of a reported Violation. A reasonable belief or suspicion that a Violation exists is enough to create a protected status for the whistleblower even if their claims are ultimately determined to be unfounded. Any individual within the Corporation who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

If an individual believes that someone who has made a report of a Violation or who has cooperated in the investigation of a Violation is suffering from harassment, retaliation, or other adverse employment or volunteer consequences, the individual should contact the designated Compliance Officer investigating the report.

A Jesus Mission shall not prevent an employee or volunteer from disclosing information to a government agency or law enforcement agency, a person with authority over the individual, or to another individual within the Organization who has authority to investigate, discover, or correct the violation or noncompliance when the reporting employee or volunteer has reasonable cause to believe the information discloses a violation of a state or federal statute, or a violation or noncompliance with a state or federal rule or regulation. Furthermore, the Organization shall not retaliate against an employee or volunteer for making such a disclosure or for refusing to participate in an activity that would result in a violation of state or federal statute, or violation or noncompliance with a state or federal rule or regulation. *A Jesus Mission* shall also not retaliate against an employee or volunteer because the individual is a family member of a person who has, or is perceived to have, engaged in any act protected by section 1102.5 of the California Labor Code.

Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint (outlined below).

1.3 Reporting Process

If an individual reasonably believes that a Violation has occurred, the individual is encouraged to share their questions, concerns, suggestions, or complaints with any person within the Organization who may be able to address them properly.

In most cases, the direct supervisor of an individual is the person best suited to address a concern. However, if an individual is not comfortable speaking with their supervisor or if they are not satisfied with the supervisor's response, the individual is encouraged to speak directly to the Compliance Officer, an overseer in the Missionary Care Department (i.e. VP of Missionary Care or Missionary Care Director), or anyone in management they feel comfortable approaching.

The following are examples of Violations that should be reported:

- (a) Stealing or misappropriation of the Organization's funds, supplies or other assets.
- (b) Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement or accounting records of the Organization.
- (c) Deviation from full and fair reporting of the Organization's financial condition.
- (d) Deficiencies in or non-compliance with the Organization's internal accounting controls.
- (e) Authorizing or receiving compensation for goods not received or services not performed.
- (f) Authorizing or receiving compensation for hours not worked, or failing to account for un-worked (but paid) hours as vacation, sick leave or other paid time off.

(g) Pursuit of a benefit or advantage in violation of the Organization's conflict of interest policy.

(h) Unauthorized alteration or manipulation of the Organization's documents or computer files in violation of the Organization's records management and retention policy.

For purposes of clarity, activities of individuals unconnected to the business of the Organization are not covered by this policy; for example, if an employee shoplifts or a volunteer who is employed by another business engages in a fraudulent practice in performing his duties at that place of employment, those illegal activities would not be covered by this policy.

1.4 Confidentiality

The Organization encourages anyone reporting a Violation to identify themselves when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously by electronic filing here: www.ajesusmission.org/misconduct/.

Reports of Violations or suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Furthermore, the Organization will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

Listed below are specific incidences when confidentiality of the complainant will not be maintained:

- (a) When the whistleblower agrees to be identified or otherwise self-discloses their identity.
- (b) When the person accused of committing a Violation is entitled to the information as a matter of legal right in disciplinary proceedings.

1.5 Handling Reported Violations

The supervisor, manager, or board member who receives a report of a Violation from the complainant is required to notify the Compliance Officer of that report, except as provided below with respect to a report relating to the Compliance Officer. The Compliance Officer will notify the complainant and acknowledge receipt of a report of Violation within ten business days, but only to the extent that the complainant's identity is disclosed or a return address is provided.

The Compliance Officer, or their designee, is responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation. The complainant will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no

further action or investigation is to follow, an explanation for the decision will be given to the complainant.

In the event the Compliance Officer is suspected of having committed a Violation, then the Violation will be reported to the Board Vice Chair, and the Violation will be investigated by the Board Vice Chair under close supervision of the Board of Directors.

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The complainant may or may not be contacted for follow up or feedback during the course of the investigation. The Organization will maintain records of Violation complaints. The Compliance Officer who receives the complaint of Violation will (1) keep the Executive Leadership Committee informed of the progress of the investigation, (2) interview individuals and request assistance when necessary to carry out this task, (3) document significant findings, (4) review all relevant documents of the Organization, and (5) prepare and submit a written record of the reported violation and its disposition to be retained for such period of time as the board of directors may determine.

At the completion of the investigation, the complainant will receive open communication regarding: the findings of the investigation, a full explanation of the Organization's response, and a reiteration of its policy of zero tolerance for retaliation.

1.6 Reports

The Executive Leadership Committee is responsible for addressing all reported concerns or complaints of Violations relating to corporate accounting practices, internal controls, or auditing. Therefore, the Compliance Officer must immediately notify the Executive Leadership Committee of any such concern or complaint. In addition, the Compliance Officer will advise the Executive Director and/or the Executive Leadership Committee of any other reported Violations, the current status of the investigation, and the outcome or corrective action taken at the conclusion of the investigation.

Adopted by the Board of Directors at its meeting on February 24th, 2026.

Definitions

Violation: Examples of activities covered by this whistleblower policy include violations of federal, state, or local law, a violation of *A Jesus Mission's* policies, falsification of records, misappropriation or misuse of funds, improper or undocumented financial transactions, and other fraudulent financial matters, among others.

Compliance Officer: The individual designated to investigate, document, and report to the assigned governing body of the Organization all significant findings in response to Violation complaints. For clarity, the Compliance Officer is an investigator, not a judge or enforcer.