



Whistleblower Protection Policy

Approved by the Board of Directors, January 23, 2020

ACHENA requires all Commissioners, Support Team Members, Advisors and Committee Members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of ACHENA, we must practice honesty and integrity and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable those associated with ACHENA to raise serious concerns internally, in order to address and correct inappropriate conduct and actions. It is the responsibility of all Commissioners, Support Team Members, Advisors and Committee Members to report concerns about violations of ACHENA's Code of Conduct or violations of laws / regulations that govern ACHENA operations.

No Retaliation

It is contrary to the values of ACHENA for anyone to retaliate against a Commissioner, Support Team Member, Advisor or Committee Member who in good faith reports an ethics violation, or a suspected violation of law. Complaints of discrimination, suspected fraud, or violation of any regulation governing the operations of ACHENA shall be protected. A Commissioner, Support Team Member, Advisor or Committee Member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of Commission membership, volunteer or employee status.

Reporting Procedure

ACHENA has an open-door policy. Commissioners, Support Team Members, Advisors and Committee Members are encouraged to share their questions, concerns, suggestions or complaints with their respective supervisor or committee chair. If not satisfied with the response, you are encouraged to speak with the ACHENA President. Supervisors and committee chairs are required to report complaints or concerns about suspected ethical and legal violations in writing to ACHENA's Executive Committee, who has the responsibility to investigate all reported complaints.

The Executive Committee

The Executive Committee, composed of the President, Vice President, Secretary and Treasurer, is responsible for ensuring that all complaints of unethical or illegal conduct are investigated and resolved. The Executive Committee will advise the full Board of Commissioners of all complaints and their resolution. ACHENA's Executive Committee shall immediately notify the Treasurer and Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a suspected violation must act in good faith with reasonable grounds for believing the disclosed information indicates a violation. Any allegations that prove unsubstantiated or which prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Executive Committee will notify the person who submitted a complaint and acknowledge receipt of the reported violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.