

## **AIChE's Whistleblower Policy**

### **October 2018**

#### **1. Purpose**

The Whistleblower Policy protects from retaliation persons who in good faith report any action or suspected action taken by or within AIChE that is illegal, fraudulent, or in violation of adopted policies of AIChE; it contains the procedures for reporting violations, investigations, consequences, and preserving confidentiality.

#### **2. Scope**

The Whistleblower Policy applies to employees, directors, officers and volunteers of AIChE. Adopted policies of AIChE include, without limitation, policies formally adopted to prevent financial wrongdoing (e.g. internal and external financial controls, accounting policies, conflict of interest policies; policies addressing unethical conduct; and harassment and discrimination policies).

#### **3. Individuals to Whom Violations May Be Reported**

If you observe an action or suspected action that is illegal, fraudulent, or in violation of adopted policies, you are required to report it. You may contact any of the following individuals; whomever you feel most comfortable speaking to about the matter, and who is not directly involved:

- I. Executive Director
- II. Chief of Administration
- III. Board President
- IV. Audit Committee Chair

#### **4. Procedures for Reporting**

- I. Violations may be reported orally or by email, telephone, text, or mail.
- II. The Executive Director shall designate the employee to administer this policy contingent upon the type of offense reported. In circumstances involving the Executive Director, the Board President shall designate the administrator of the policy.
- III. Investigative Process:
  - a. Receipt of the report will be acknowledged as soon as possible or within five business days, to the extent the reporting person's identity is disclosed.

- b. Interviews will be performed with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have relevant knowledge; relevant documents will be obtained.
- c. The report and investigation will be handled confidentially throughout the investigatory process to the extent practical and appropriate under the circumstances until such time as the report is made known to the Board of Directors, Audit Committee, independent auditor, or legal counsel for review and determination of the course of action.
- d. The person who is the subject of a whistleblower complaint shall not be present at or participate in board or committee deliberations or vote on the matter relating to such complaint. The Board or committee may request that the person who is subject to the complaint present information as background or answer questions prior to the commencement of deliberations or voting.
- e. AICHe will maintain a written record of each complaint, its investigation and its resolution. Written records will be maintained in confidence to the extent practical and appropriate for a period of at least seven years. The complainant and accused will be notified of the investigation's findings.
- f. Each person designated as the administrator of a whistleblower report is required to report on the policy, its implementation, and the general type and resolution of whistleblower complaints to either the Audit Committee, other committee of the Board consisting of independent Directors, or to the Board itself.
- g. Retaliation against an individual reporting or assisting in providing information relevant to a claim of action or suspected action within AICHe that is illegal, fraudulent, or in violation of adopted policies of AICHe is in violation of this policy. Consequences include immediate disciplinary action including but not limited to termination of AICHe employment, Membership, or Board service.

## 5. Distribution

A copy of this policy shall be provided to all employees, officers, directors and key volunteers as part of the employee handbook, director and volunteer orientations, and governance documents included on AICHe's website.