

WHISTLEBLOWER POLICY

General

In keeping with the policy of maintaining the highest standards of conduct and ethics, ASAS will investigate any suspected fraudulent or dishonest use or misuse of ASAS's resources or property by staff, board members, consultants or volunteers. ASAS is committed to maintaining the highest standards of conduct and ethical behavior and promotes a working environment that values respect, fairness and integrity. All staff, board members and volunteers shall act with honesty, integrity and openness in all their dealings as representatives for the organization. Failure to follow these standards will result in disciplinary action including possible termination of employment, dismissal from one's board or volunteer duties and possible civil or criminal prosecution if warranted.

Staff, board members, consultants and volunteers are encouraged to report suspected fraudulent or dishonest conduct (i.e. to act as "whistle-blower"), pursuant to the procedures set forth below.

Reporting Responsibility

It is the responsibility of all members of the board of directors, volunteers, consultants and ASAS employees to comply with the ASAS ethics policy described above and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No member of the board of director's, volunteer, consultant or ASAS employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Reporting Violations

The Code addresses the Organization's open-door policy and suggests that any member of the board of directors, volunteer, consultant or ASAS employee share their questions, concerns, suggestions or complaints with the ASAS Board of Directors or the ASAS Executive Committee. If you are not comfortable speaking with the board of directors or with the executive committee, you are encouraged to speak with someone in management whom you are comfortable in approaching. It is required that all suspected violations of the Code of Conduct be reported to the ASAS Board of Directors, who have specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Organization's open-door policy, individuals should contact the ASAS Board of Directors directly.

Compliance

The ASAS Board of Directors is responsible for investigating and resolving all reported complaints and allegations concerning violations, at their discretion, shall advise the Executive Director and/or the audit committee. If needed the board will appoint an ad hoc audit committee. The chair of the audit committee will be titled Compliance Officer.

Accounting and Auditing Matters

The board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. If necessary, the board of directors will appoint an audit committee as described under the compliance section of this document.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the ethics policy. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. 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 Board of Directors will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Updated 12/01/12