



## **Policy Statement - Whistleblower**

*Approved: 15 November 2024*

### **General**

Directors, contractors, and other volunteers are required to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the AMGLR Whistleblower Policy are to establish policies and procedures for the following:

- To encourage all members of the AMGLR community to report suspected violations of law or misconduct.
- To provide a mechanism for reporting and investigating suspected violations.
- To reinforce AMGLR's non-retaliation policy for any member or employee of the AMGLR community who in good faith voices concerns; seeks advice; files a complaint or grievance; testifies or participates in investigations, compliance reviews, proceedings or hearings; or opposes actual or perceived violations of AMGLR's policy.

### **Reporting Responsibility**

Each director, volunteer and contractor of AMGLR has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting matters, and (b) unlawful activities, policies or practices of the Organization (hereinafter collectively referred to as Concerns).

### **Authority of Board**

All reported Concerns will be forwarded to the Board in accordance with the procedures set forth herein. The Chair shall be responsible for investigating and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.

## **Procedures**

### **Reporting Concerns**

Directors, other volunteers and contractors should submit Concerns in writing directly to the Chair or to another member of the Board if the Concern involves the Chair. Contact information for the Chair of the Board is available on the organization's website.

### **Handling of Reported Violations**

The Board shall address all reported Concerns. The Chair shall immediately notify the Board and the Account Executive of any such report. The Chair shall notify the sender and acknowledge receipt of the Concern within five (5) business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports shall be investigated promptly by the Board, and appropriate corrective action shall be taken, if warranted by the investigation. In addition, action taken must include a conclusion

and/or follow-up with the complainant for complete closure of the Concern.

The Board has the authority to retain outside legal counsel, accountant, private investigator or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

### **No Retaliation**

This Whistleblower Policy is intended to encourage and enable directors, volunteers and contractors to raise Concerns within the Organization for investigation and appropriate action. With this goal in mind, no director, volunteer or employee who, in good faith, reports a Concern shall be subject to retaliation. Moreover, a volunteer or contractor who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of contract employment.

### **Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting practice or a violation of a law, rule or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare and protection of the Organization. The act of making allegations that prove to be unsubstantiated and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of the employment contract. Such conduct may also give rise to other actions, including civil lawsuits.

### **Confidentiality**

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.