

# **Governance Policies - 4**

## **Whistleblower Policy**

### **Purpose**

AIA Continental Europe is transparent and accountable to its members and employees. The Board of Directors expects volunteers, consultants and any future employees (AIA CE does not have any employees in 2019) to obey the law (according to European Union law and the country they act in), act ethically and report honestly to their supervisors. Volunteers and employees will contact senior management, legal counsel, or officers, as appropriate, about any activity that may violate law, policy or ethics.

This policy covers serious concerns that could affect the component, including actions that:

- Could lead to inaccurate financial reporting;
- Are unlawful, such as fraud, theft, embezzlement, or other illegal activities; •
- Are inconsistent with policies or procedures;
- Consist of serious misconduct, such as unethical business conduct, other inappropriate conduct, or concerns about employee health risks under the component's control. • Destroy documents in violation of the component's records retention policy; or • Result in the inappropriate or illegal use of component property.

The policy is intended to encourage volunteers, consultants and any future employees to raise serious concerns within the component before seeking action from outside sources.

### **Precision**

It is admitted, that at this point of time AIA Continental Europe does not have any employees. This policy covers the appropriate conduct in case employees should be hired in the future and in case a difficulty should arise between the chapter and its members, consultants, or volunteers.

### **Confidentiality**

Every effort will be made to protect confidentiality. AIA Continental Europe will not tolerate harassment or retaliation against anyone submitting a report under this policy. While anonymous reports are accepted, identifying oneself can strengthen the credibility of the report and aid the investigation. Malicious or knowingly false reports may result in disciplinary action, up to and including termination of employment or service as a volunteer.

AIA Continental Europe

### **Guidelines for Reporting a Violation:**

- When possible, employees should report the violation initially to their direct supervisor. • Volunteers, or employees who are uncomfortable speaking with a supervisor, should speak with any member of the Board of Directors.
- Supervisors must report suspected violations to a member of the Board of Directors but take no further action unless the Board member requests it.
- Except in extraordinary circumstances, the President and President-elect will be notified when a report is received. Other persons may be notified on a need-to-know basis. • If the violation concerns fraud or financial misconduct, a report may be made directly to the Treasurer.

### **Investigation and Reporting**

The Board of Directors has specific and exclusive responsibility to appoint one of its members to investigate all reported violations. The Board of Directors may recuse certain members, and/or retain impartial outside counsel or auditors to conduct the investigation.

The appointed investigator will conduct a prompt investigation, acknowledge receipt of the report within 5 business days, and inform the reporting party of next steps and when to expect an update on the investigation. The investigator will do everything possible to keep the identity and role of the reporting party confidential (although legal requirements or other circumstances may make it impossible to fully protect confidentiality in some cases).

The person reporting an allegation is not expected to prove the truth of the allegation but should expect to be interviewed (unless reporting anonymously) and to submit any evidence available.

The investigator will submit a written report summarizing the allegations and his/her recommendations, to members of the executive management who have a reasonable need to review the report, to the officers, and/or to the Board of Directors, as appropriate. The reporting party will be informed about the results of the report.

When appropriate, corrective action will be taken. That action will depend on how serious the violation is and may include such things as a warning, a letter of reprimand, suspension with or without pay, or termination of employment. In the case of a volunteer, corrective action may include such things as limitations on the volunteer's opportunity to serve on committees, or the initiation of a complaint with the National Ethics Council, as appropriate.

If the process described above is not followed, the party reporting a violation may contact the President of AIA Continental Europe or the President-elect.

**Approved by the board on January 10<sup>th</sup> 2019**