



## AEG FOUNDATION

### WHISTLEBLOWER PROTECTION POLICY

#### INTRODUCTION

In keeping with the policy of maintaining the highest standards of conduct and ethics, The AEG Foundation (the AEGF) will investigate any suspected fraudulent or dishonest use or misuse of the AEGF's resources or property by board members, consultants, or volunteers.

Board Members, consultants, contractors and volunteers are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as "whistleblower"), pursuant to the procedures set forth below.

#### REPORTING

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to the Foundation President, or, if the President is being reported, to the Vice President or another Board Officer. Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals noted above.

#### DEFINITIONS

##### **Baseless Allegations**

Allegations made with reckless disregard for their truth or falsity are considered baseless. Individuals making such allegations may be subject to disciplinary action by the Foundation, and/or legal claims by individuals accused of such conduct.

##### **Fraudulent or Dishonest Conduct**

A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include:

- Forgery or alteration of documents;
- Unauthorized alteration or manipulation of computer files;
- Fraudulent financial reporting;
- Pursuit of a benefit or advantage in violation of the AEGF's Conflict of Interest Policy;
- Misappropriation or misuse of the AEGF's resources, such as funds, supplies, or other assets;

## AEG Foundation – Whistleblower Protection Policy

- Authorizing or receiving compensation for goods not received or services not performed; and
- Authorizing or receiving compensation for hours not worked.

### **Whistleblower**

A Foundation board member, consultant, or volunteer who informs the Foundation President or another Foundation Officer as outlined above about an activity relating to the Foundation which that person believes to be fraudulent or dishonest.

## **RIGHTS AND RESPONSIBILITIES**

### **Board Members, Consultants, and Volunteers**

Board Members, consultants, contractors and volunteers are required to report suspected fraudulent or dishonest conduct to the President or another AEGF Officer as outlined above. Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations;
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation; and
- Violations of a person's rights under law.

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. Board members, while appropriately concerned about "getting to the bottom" of such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, a Board Member who becomes aware of suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand that the President or another Board Officer as outlined above investigate the matter;
- Should not discuss the case with attorneys, the media, or anyone other than the President or another Board Officer as outlined above; or
- Should not report the case to an authorized law enforcement officer without first discussing the case with the President or another Board Officers as outlined above.

### **INVESTIGATION**

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting person and the Foundation Board. Investigations may warrant investigation by independent persons such as auditors and/or attorneys.

## WHISTLEBLOWER PROTECTION

The AEGF will protect whistleblowers as defined below:

- The AEGF will use its best efforts to protect whistleblowers against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that the AEGF can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.)
- Board Members, consultants, contractors and volunteers of the AEGF may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's relationship to the AEGF, including but not limited to, threats of physical harm, loss of contract, punitive work assignments, or impact on fees. Whistleblowers who believe that they have been retaliated against may file a written complaint with the AEGF Executive Committee. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit the AEGF Board from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).

Approved by the AEG Foundation Board of Directors on July 11, 2022



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Rosalind Munro, Secretary

