



## **Whistleblower Policy**

### **Expectation**

Association of Strategic Alliance Professionals, Inc. (the “Organization”) expects all individuals including but not limited to, directors, officers, volunteers, employees, and third parties who do business with the Organization to observe high ethical standards in carrying out their responsibilities and to comply with all applicable laws and regulations. The purpose of this Whistleblower Policy is to encourage and enable reporting of suspected violations, ensure concerns are investigated, and protect individuals from retaliation.

### **Reporting**

If any person has complaints, concerns, or questions as to the ethics or legality of a particular action taken by another person, they are encouraged to raise such complaints, concerns, or questions with the relevant individual. With respect to directors and officers, the relevant individual is the Chair of the Board of Directors. With respect to employees, volunteers or third parties, the relevant individual is the president, or chief executive officer if there is one in office, and if not, the Chair of the board of directors. In the event the complaint involves the Chair, President or Chief Executive Officer, and it is not reasonable to raise the issue with them, the complainant should contact a member of the Board of Directors. Reports may be made verbally or in writing, and anonymous submissions will be accepted; however, the complainant should be advised that identification may need to be made at a later date. Anyone filing a complaint concerning a violation or suspected violation of a law, regulation or ethical requirement must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Individuals making baseless or malicious accusations will be disciplined up to and including termination.

## **Requirement of Investigation**

Within a reasonable time of receiving a complaint, concern, or question regarding compliance with a law, regulation, or ethics requirement, the president, chief executive officer, and/or director shall open an investigation into the matter. All investigations will be documented, conducted promptly, and carried through to resolution.

Should the person investigating the complaints, concerns, or questions determine that a law, regulation, or ethics requirement has been violated, appropriate action should be taken. Results and any corrective actions will be reported to the Board of Directors or relevant committee, as appropriate.

## **Confidentiality**

Reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and comply with legal obligations.

## **Protection from Retaliatory Action**

Neither the Organization nor any of its directors, officers, volunteers, employees, or third parties may take any negative employment, contract or other retaliatory action against any director, officer, volunteer, employee, or third party who in good faith reports a violation of a law or regulatory requirement. Any individual who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment, removal from office or termination of contract.

## **Documentation & Record Retention**

Records of all reports, investigations, and outcomes will be maintained by the Organization in accordance with its Record Retention and Destruction Policy and applicable law.

## **Distribution of Policy**

A copy of this policy will be posted to the Organization's publicly accessible website and notification of such provided to all directors, officers, employees, volunteers and third parties.

## **General Policy**

This general policy is not a contract, and it may be rescinded or amended at any time by the Organization. It is not intended to and does not create any legally enforceable rights whatsoever for any person.

## **Process for Reporting & Investigation**

1. Submit a report: Share your concern verbally, by email, or anonymous note as allowed by this policy.
2. Acknowledgment: The Organization confirms receipt within 5 business days (unless anonymous with no contact provided).
3. Investigation kickoff: A documented review starts within 10 business days, led by an authorized investigation lead or board member if needed.
4. Findings & action: The outcomes and any corrective steps are shared with the Board of Directors or relevant committee.
5. Timeline to close: Investigations are completed within 30–60 days when possible. If more time is needed, the investigator provides a status update every 30 days.
6. Recordkeeping: Reports, investigation notes, and outcomes are stored following the Organization's retention practices and used only for resolution and compliance.
7. Non-retaliation check: Any claims of retaliation are reviewed immediately and documented as part of the process.