

Whistleblower Protection Policy

1. Reporting Responsibility:

ACG Austin/San Antonio (the “Chapter”) expects directors, officers, independent contractors, and members to report suspected violations of ACG policies, including illegal or improper conduct by ACG Austin/San Antonio itself, by its leadership, or by others on its behalf. Suspected conduct that should be reported would include:

- a) Supplying false or misleading information on the Chapter’s financial or other public documents, including its Form 990
- b) Providing false information to, or withholding material information from the ACG’s independent auditors
- c) Destroying (other than as permitted by the chapter’s Record Retention and Destruction Policy), falsifying or concealing any records that are official documents of the Chapter
- d) Embezzling or stealing the Chapter’s funds or other assets
- e) Paying for services or goods that are not rendered or delivered, or “laundering” funds
- f) Violating the Chapter’s Conflict of Interest Policy, Whistleblower Protection Policy, or Record Retention and Destruction Policy
- g) Facilitating or concealing any of the above or similar actions

2. No Retaliation:

The Chapter’s policy is that no director, officer, employee, independent contractor or member who in good faith reports a suspected violation will suffer harassment, retaliation or adverse consequence even if the report is mistaken, or against any other person who assists in the investigation or a reported violation. An employee, independent contractor, officer, director or member who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to or including termination of employment or other engagement, or removal from leadership position and/or membership in the Chapter. The Chapter reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries, or who otherwise abuse this policy.

3. Reporting Process:

Suspected violations should be reported to the Chapter president and to one director. Reports should identify the reporting person and describe in detail the specific facts that have caused the reporting person to suspect violation. Reports will be kept confidential except to the extent necessary to conduct a complete and fair investigation. While a report may be submitted anonymously, the reporting person should understand that anonymity may impede the Chapter’s ability to conduct a complete investigation.

4. Response:

Upon receipt of a report of a suspected violation, the Chapter will conduct a prompt, complete, and fair investigation, consulting with outside counsel or accountants where deemed appropriate. A report of findings will be submitted to the Chapter’s Board of Directors with recommendations for action, if any.