



## ILLINOIS TECHNOLOGY ASSOCIATION

### WHISTLEBLOWER POLICY

*(Adopted by the ITA Board of Directors on December 5, 2012)*

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The Illinois Technology Association (the "Association"), an Illinois not for profit 501(c) 6 corporation, is subject to certain federal and state laws governing its operations. The Association is committed to the maintenance of the trust and confidence of its members and the general public. Our reputation in the community and our obligation to comply with the federal and state laws therefore necessitates strict compliance with the law by the Association's Board members, officers, management, staff and volunteers.

Board members, officers, management, staff, member and volunteers of the Association are encouraged to report evidence of fraud, unethical business conduct, questionable accounting, problems with internal accounting controls, financial reporting or auditing, and violations of law occurring within the Association. The Association's will promptly investigate all reports of such matters. The Association prohibits retaliation with the intent or effect of adversely affecting the terms or conditions of such person's employment against a person who reports such matters in good faith. No person may be adversely affected for refusing to carry out instructions that constitute corporate fraud or a violation of applicable law or for reporting such improper activity. Any person who believes they have been so retaliated against or adversely affected must immediately notify either a member of the Board of Directors or the CEO ("Notified Party").

In the event that a Notified Party receives a report of improper activity described above, such individual shall call a special meeting of the Executive Committee, in accordance with the By-Laws of the Association, and at such meeting, the Notified Party shall communicate such report to the entire Executive Committee.

Any person reporting improper activity is encouraged to provide as much specific information as possible and should do so in writing. Any person who desires to make such a report may do so anonymously. All such reports will be handled confidentially to the extent possible to permit necessary investigation and compliance with applicable laws and regulations. Documentation relating to all reports and their resolution shall be kept and maintained in accordance with the Association's general record retention practices.

The Executive Committee shall in their best business judgment determine whether there is sufficient evidence of wrong doing to initiate a formal investigation of the incident. In the event the Board of Directors determines that further investigation is warranted, the Executive Committee shall direct counsel for the Association to direct or otherwise conduct the investigation ("Formal Investigation"). The Directors, Officers and employees of the Association shall cooperate with the Formal Investigation. The results of the Formal Investigation shall be presented to the Board of Directors or a Special Committee of the Board of Directors appointed for the purpose of overseeing the Formal Investigation, if any.