

National Limousine Association, Inc.

Whistleblower Policy

The National Limousine Association, Inc. (“the NLA”) is committed to high standards of ethical, moral, and legal business conduct. The NLA is further dedicated to acting in good faith with respect to its directors, officers, Executive Director or successor thereto, managed personnel, agents and/or employees (each of the foregoing hereinafter being referred to individually as “Covered Person” and collectively as “Covered Persons”) who raise concerns regarding incorrect financial reporting, unlawful activity, or otherwise improper conduct. The NLA is committed to practicing honesty and integrity in fulfilling its responsibility and in complying with all applicable laws and regulations.

This Whistleblower Policy aims to provide Covered Persons with an avenue for raising such concerns, and to reassure such Covered Persons that they will be protected from reprisal or victimization as a consequence of reporting the alleged wrongdoing of any officer, director, Executive Director or successor thereto, employee, managed personnel, or agent of NLA.

Statement of Policy

No officer, director, Executive Director or successor thereto, senior manager, employee, or agent of NLA shall take any harmful action with the intent to retaliate against any Covered Person, including interference with employment or livelihood, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any offense, nor shall any officer, director, Executive Director, senior manager, employee, or agent of NLA take any harmful action with intent to retaliate against any Covered Person for reporting to an appropriate senior management or elected official of NLA the suspected misuse, misallocation, or theft of any organization resources.

Safeguards

Harassment or Victimization – The NLA shall not tolerate retaliation against or the harassment or victimization of any Covered Person who raises concerns under this policy.

Confidentiality – The NLA shall make every effort to treat with an appropriate regard for confidentiality the identity of any Covered Person who files a complaint or report, with the understanding that the details of reports or complaints may need to be shared with others in order to investigate such complaints properly.

Anonymous Allegations – Because a thorough investigation often depends on an ability to gather additional information, the NLA encourages Covered Persons who file complaints or reports to put their names to allegations of wrongdoing. The NLA will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

Bad Faith Allegations – Any Covered Person filing a complaint concerning a violation or suspected violation of the NLA’s policies and procedures or applicable law must act in good faith and have reasonable grounds for believing that the information disclosed indicates a violation. Any allegations that prove to be unsubstantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Procedure

Process for Raising a Concern:

Reporting – The NLA has an open door policy. Covered Persons should share their questions, concerns, suggestions, complaints or reports with someone who can address them properly. The NLA intends this policy to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting or unethical or illegal conduct, may be reported directly to: NLA’s President, either of its Vice-Presidents, its Secretary or its Treasurer (each a “Recipient”). The Recipient shall then apprise NLA’s President of the matter. Within five business days after being so notified, the NLA’s President shall communicate with the Covered Person who filed the complaint or report and so acknowledge receipt thereof. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Timing – The earlier a concern is expressed, the easier it is to take action.

Evidence – Although a Covered Person who files a complaint or report of violation is not expected to prove the truth of an allegation, he or she should be able to demonstrate that he or she has made a report in good faith.

How the Report of Concern Will Be Handled:

Initial Inquiries – The Recipient will make initial inquiries in consultation with NLA’s legal counsel, if necessary, to determine whether or not further investigation is necessary or appropriate.

Further Information – The Recipient may seek further information from any officer, director, Executive Director or successor thereto, manager, employee, or agent of the NLA, and shall take all reasonable precautions to protect the identity of the complainant to the extent possible while doing so.

Reporting – The NLA’s Board of Directors (“Board”) and the Executive Committee shall receive information on each complaint. In consultation with the Recipient and, if necessary, the NLA’s legal counsel, the Board shall determine an appropriate response to a report of concern. Should an NLA officer, director, Executive Director or successor thereto, manager, employee, and agent be implicated in such reports, such individual shall not participate in any deliberation of the Board related to the complaint, except to present information directly to the Board on his or her own behalf.

* * *

For additional information, please contact the Executive Director of the NLA. The NLA reserves the right to modify or amend this policy at any time.