



ACCP WHISTLE BLOWER POLICY

Audience: ACCP Staff, Board, and Membership
Communications Channel: ACCP Employee Handbook, Board Portal and Orientation, ACCP's public website

This whistle blower policy of the Association of Corporate Citizenship Professionals ("ACCP"): 1) encourages ACCP officers, directors, staff, volunteers, consultants and members to come forward with credible information on illegal, improper or unethical conduct or practices and/or violations of ACCP policies; 2) specifies that ACCP will protect the person ("Whistleblower") from retaliation; and 3) identifies where such information can be reported.

1) Encouragement of reporting: ACCP encourages complaints, reports, or inquiries about illegal, improper or unethical conduct or practices or violations of ACCP's policies, including illegal, unethical or improper conduct on the part of ACCP's leadership, or by others on leadership's behalf. Appropriate subjects to raise under this policy could include, but are not limited to, financial improprieties, accounting or audit matters, ethical violations, unfair trade practices, or other similar illegal, unethical or improper practices.

2) Protection from retaliation: ACCP prohibits retaliation by or on behalf of ACCP against officers, directors, staff, volunteers, consultants, or members for making good faith complaints, reports or inquiries or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but proven to be mistaken. ACCP 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) Where to report: Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to ACCP's Board Chair, President and CEO, or Vice Chair *and* legal counsel as follows:

If the President and CEO is the subject of the complaint, report or inquiry, the same should be directed to the ACCP Board Chair. If the Board Chair is the subject of the complaint, report or inquiry, the same should be directed to the President and CEO, and/or the Vice Chair. If the President and CEO, Board Chair and Vice Chair are the subjects of the complaint, report or inquiry, it should be directed to ACCP's legal counsel. ACCP will undertake to conduct a prompt, discreet and objective review and/or investigation. Please note that ACCP may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

M. Andrea Wood, ACCP CEO
Carlos Pagoaga, ACCP Board Chair
Robert Weil, PLLC, Attorney at Law

andrea.wood@accp.org	240-262-5499
cpagoaga@coca-cola.com	404-676-4877
bob@rweillaw.com	703-225-3477