



WHISTLEBLOWER POLICY

The ACOG Foundation requires that its Executive Board members, officers, volunteers and employees conduct their duties and responsibilities in accordance with high ethical standards and in compliance with the ACOG Foundation Statement of Values.

I. Reporting Violations

The ACOG Foundation encourages any of its Executive Board members, officers, volunteers and employees who believe that there has been a violation of the ACOG Foundation Statement of Values to report any such incident regardless of the identity of the individual involved.

An Executive Board member, officer, volunteer or employee who believes that there has been a violation of the Statement of Values should report the incident to the Chief Legal Officer. If the Chief Legal Officer is believed to be involved in the conduct or if, for some other reason, the Executive Board member, officer, volunteer, or employee feels uncomfortable reporting the incident to the Chief Legal Officer, the individual should report the incident to the Chair of the ACOG Foundation's Finance Committee. ACOG Foundation employees may also report violations to their supervisors or to the Chief Human Resources Officer. Supervisors and the Chief Human Resources Officer are required to report suspected violations to the Chief Legal Officer or, if the Chief Legal Officer is believed to be involved in the conduct, to the Chair of the Finance Committee. Suspected violations may be submitted anonymously. The ACOG Foundation encourages prompt reporting so that the complaint can be investigated in a timely manner.

II. Investigations

All alleged violations of the ACOG Foundation's Statement of Values that are reported under this policy will be investigated by the Chief Legal Officer or outside legal counsel, assisted by such ACOG Foundation Executive Board members, officers, volunteers or employees as they deem appropriate. Investigations will be conducted in as prompt and as confidential a manner as practicable and appropriate under the circumstances. All Executive Board members, officers, volunteers and employees have a duty to cooperate in the ACOG Foundation's investigation of alleged violations of the Statement of Values and are required to preserve the confidentiality of the investigation. Upon receiving a report, the Chief Legal Officer or outside legal counsel will notify the ACOG Foundation Audit Committee and will work with the Audit Committee until the matter is resolved. Upon completion of the investigation, appropriate corrective action will be taken if warranted by the investigation. The ACOG Foundation will communicate its findings and intended actions, if any, to the complainant.

Violations of the ACOG Foundation's Statement of Values by an employee will be viewed as a serious offense and the employee may be disciplined and possibly terminated. The

ACOG Foundation Executive Board will address violations by an Foundation Executive Board member, officer or volunteer.

III. Appeals Procedure

Any Executive Board member, officer, volunteer or employee who is dissatisfied with the ACOG Foundation's response to a reported violation of the Statement of Values may submit the reasons for that dissatisfaction with the ACOG Foundation's response to the Treasurer of the ACOG Foundation. The Treasurer shall review the allegations, consider the issues and reasons for dissatisfaction with ACOG Foundation's action, conduct a discretionary interview with the Executive Vice President and CEO and report the findings to the Audit Committee.

IV. Good Faith Required

Anyone filing a complaint concerning a suspected violation of the Statement of Values must be acting in good faith and have reasonable grounds for believing that a violation of the statement occurred. Any allegations that prove to be unsubstantiated and that prove to have been made maliciously or with knowledge of their falsehood will be viewed as a serious disciplinary offense.

V. Retaliation Prohibited

It is essential that Executive Board members, officers, volunteers and employees bring matters related to the Statement of Values to the ACOG Foundation's attention so that the ACOG Foundation can ensure compliance with the statement. No Executive Board member, officer, volunteer or employee who in good faith complies with, or reports a suspected violation of, the Statement of Values shall suffer harassment, retaliation, adverse employment consequences, or other adverse actions because of such compliance or report. Any employee who believes that he or she has been subjected to an adverse action because of complying with the Statement of Values, or reporting a suspected violation of the statement, should follow the current procedures for reporting employee complaints or report the action to the ACOG Foundation Audit Committee. Any Executive Board member, officer or volunteer who has been subjected to an adverse action because of complying with the Statement of Values or reporting a suspected violation of the statement should report the action to the Executive Board by contacting the Chief Human Resources Officer. The Executive Board shall investigate the matter and take action as warranted.

Approved by the Executive Board: December 2004
Revised for name changes: January 2018 and June 2018