

## **ACE Mentor Program of America, Inc. Whistleblower Policy**

### **General**

ACE Mentor Program of America, Inc. (the “Organization”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the Organization must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers and employees to report ethics or other violations in accordance with this Whistleblower Policy.

### **No Retaliation**

No director, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

### **Reporting Violations**

The Organization has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected ethics violations to the Organization’s CEO, who has specific responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Organization’s open-door policy, individuals should contact the Organization’s President or any member of the Board of Directors directly.

### **Compliance Officer**

The Organization’s President shall be the Compliance Officer and is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Executive Committee and/ or Board of Directors.

### **Accounting and Auditing Matters**

The finance committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls and auditing. The Compliance Officer shall immediately notify the finance committee of any such complaint and work with the committee until the matter is resolved.

**Acting in Good Faith**

Anyone submitting a complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

**Finance Committee Compliance Officer:**

Ridge Miller

Treasurer – ACE National Board

**The Organization's Management Staff:**

Diana Eidenshink

President