

ASCDI Whistleblower Policy

In the spirit of the Sarbanes Oxley Act of 2002, it is the responsibility of all Association Board Members and the employees of any contractors to comply with the ASCDI Code of Ethics. All affiliated with the ASCDI either as a volunteer, member or vendor are encouraged to report violations in accordance with this Whistleblower Policy.

A whistleblower as defined by this policy is a Board Member, Member, contractor or employee of a contractor of ASCDI (hereafter called “Whistleblower”) who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this policy. The Whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If a Whistleblower has knowledge of or a concern of illegal or dishonest fraudulent activity, he or she is to contact the President or Chairman of the ASCDI. The Whistleblower must exercise sound judgment to avoid baseless allegations. A Whistleblower who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Association will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of action such as termination, compensation decreases, or reduced work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Association outside legal counsel. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the Association’s outside counsel, President or Chairman who are responsible for investigating and coordinating corrective action. The Association’s outside counsel is Mr. Robert Boyle (bobby@boylelawfirm.com) and the Association’s President is Joseph Marion (jmarion@ascdi.com)

Any questions regarding this policy should be directed at outside legal counsel.