

# **Alzheimer's Association**

## **Whistleblower Policy**

### **General**

The Code of Conduct (öCodeö) of the Alzheimer's Association (öAssociationö) requires its directors, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and to comply with all applicable laws and regulations. In fulfillment of those responsibilities, the Alzheimer's Association Whistleblower Policy (öPolicyö) is established to facilitate:

- The confidential or anonymous submission of concerns regarding suspected criminal, fraudulent, or unethical acts by directors, employees, volunteers, and other stakeholders of the Association.
- The receipt, retention, and treatment of complaints received by the Association regarding such matters.
- The protection from retaliatory actions of directors, employees, and volunteers that report in good faith.

### **Reporting Responsibility**

Each director, employee, and volunteer of the Association has an obligation to report in accordance with the Whistleblower Policy (a) suspected violations of state or federal laws including, but not limited to, criminal, fraudulent, or unethical behavior such as discrimination or harassment, embezzlement, falsification of contracts/reports/records, sabotage or vandalism, theft, unsafe working conditions, and violence or threats, (b) questionable or improper accounting, internal control or auditing matters, and (c) violations and suspected violations of the Association's Code of Conduct or other policies (hereinafter referred to individually as a öConcernö and collectively as öConcernsö). The preceding definition of Concerns is not intended to be an exhaustive list of the improper conduct encompassed by the Whistleblower Policy. Rather this policy is intended to serve as a means of reporting all suspected serious improprieties that may potentially impact the integrity or effective operation of the Association.

### **No retaliation**

This Whistleblower Policy is intended to encourage and enable directors, employees, and volunteers to raise Concerns prior to seeking resolution outside of the Association. With this goal in mind, no director, employee, or volunteer, who, in good faith, reports a Concern shall be subject to harassment, retaliation, or adverse employment consequences as a result of making the report. Moreover, a director, employee, or volunteer who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including removal from the Board of Directors, termination of employment, or dismissal from the volunteer position.

### **Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates improper conduct, as outlined above. The act of making false

allegations that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including removal from the Board of Directors, termination of employment, or dismissal from the volunteer position.

### **Procedure for Reporting Concerns**

#### Employees

If practicable, employees should first discuss an actual or suspected Concern with their immediate supervisor. If the employee is not comfortable speaking with his/her supervisor, or the supervisor is the subject of the Concern, the employee is encouraged to report the actual or suspected Concern to the Human Resources Department, any Association manager, the Legal Department, or report the actual or suspected Concern anonymously using the Association's Ethics hotline (1-866-568-5426). Supervisors and managers are required to report actual and suspected Concerns to the Legal Department, which has specific and exclusive responsibility to direct the resolution of such reports under the supervision of the Audit Committee.

#### Directors and Other Volunteers

Directors and other volunteers should submit Concerns in writing directly to the Association's Legal Department at: Alzheimer's Association, Attn: Legal Department, 225 N. Michigan Ave. Fl. 17, Chicago, Illinois 60601, or may report the actual or suspected Concern anonymously using the Association's Ethics hotline (1-866-568-5426).

### **Handling of Reported Violations**

The Sr. Director-Legal/General Counsel will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

### **Confidentiality**

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns by anyone other than the reporting individual to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including removal from the Board of Directors, termination of employment, or dismissal from a volunteer position.

Approved: \_\_\_\_\_  
Chief Operations Officer

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President/Chief Executive Officer

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Date