



WEST SUBURBAN ASSOCIATION OF PLUMBING CONTRACTORS WHISTLEBLOWER POLICY

The West Suburban Association of Plumbing Contractors (WSA) requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the WSA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

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

The Whistleblower Policy is intended to protect you if you raise concerns regarding the WSA such as:

- Incorrect financial reporting;
- Unlawful activity;
- Activities that constitute violations of WSA policy, including the Code of Business Conduct; or
- Activities which otherwise amount to serious improper conduct.

No Retaliation

No director, officer or employee who in good faith reports a 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 WSA prior to seeking resolution outside the WSA.

Reporting Violations

The Whistleblower Policy is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct may be reported directly to the WSA's Executive Director, to one of its executive officers, or to the WSA's outside legal counsel, currently Tom Posey of Faegre Baker Daniels LLP. Employment-related concerns should continue to be reported through the Executive Director and/or to one of the executive officers.

Accounting and Auditing Matters

The Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

Acting in Good Faith

Anyone submitting a complaint concerning a violation or suspected violation of professional conduct must be acting 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 possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The action taken by WSA in response to a complaint or report of concern under this Policy will depend on the nature of the complaint or concern. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information

The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided.

Further information may be sought from or provided to the person reporting the concern.