Whistleblower Policy and Process

AMIA requires employees and members of the Board of Directors (hereby referred to as "directors") to observe high standards of ethical, moral, and legal business in the conduct of their duties and responsibilities. As employees and representatives of AMIA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Further, AMIA is dedicated to acting in good faith with those employees who raise concerns regarding incorrect financial reporting, unlawful activity, or otherwise improper conduct. This Whistleblower Policy is intended to encourage and enable employees and directors to raise serious concerns about misconduct by AMIA staff or volunteer leaders.

All AMIA employees and directors are expected to report any acts of financial impropriety, fraud, gross mismanagement, violations of law, or other improper acts of the type listed below (collectively referred to herein as "Improper Acts") committed by AMIA staff or volunteers, including, but not limited to:

- material deviations from generally accepted accounting principles;
- improper alteration of records;
- unethical business conduct;
- embezzlement, misuse, or waste of AMIA funds;
- gross mismanagement of AMIA contracts that could result in financial or other harm to AMIA;
- any act that could create a substantial and specific danger to others', e.g. failing to follow local laws regarding public health and/or spreading disinformation;
- any intentional violation of any law or regulation.

Reports should be made by sending an email message to confidentialreport@amia.org to submit to the AMIA Chief Executive Officer or Board President/Chair. If you prefer the report to be anonymous, it may be sent to:

6218 Georgia Avenue NW, Suite #1 PMB 3077 Washington, DC 20011

Realize that anonymous reports preclude AMIA from engaging in any follow-up inquiry to seek further facts or clarification and preclude AMIA from judging the credibility of the accuser. As such, signed reports are much preferred.

Confidentiality Reports will be treated as confidential to the extent reasonably possible and shared only with those having a bona fide need to know. All reports will be promptly documented and investigated by the AMIA Chief Executive Officer, President/Chair and/or legal counsel, as appropriate. If you report an Improper Act, a summary of your report may be shared with the subject of the report to provide that person with an opportunity to respond. In addition, the results of all investigations, along with any corrective action, will be reported to the President/Chair of the Board of Directors and the AMIA Chief Executive Officer.

Non-Retaliation AMIA will not retaliate or otherwise take any personnel action(s) against any employee or director who discloses in good faith information that the employee reasonably believes evidences an Improper Act. Moreover, AMIA will not take any adverse personnel action against any employee who in good faith objects to or refuses to participate in what he/she reasonably believes is an Improper Act or who seeks a remedy after disclosing any such behavior. An employee or director who

retaliates against someone who has, in good faith, reported an Improper Act is subject to disciplinary action. On the other hand, any allegations of Improper Acts that prove to be unfounded and that prove to have been made in bad faith may result in disciplinary action.

Acknowledgement AMIA employees and directors shall acknowledge receipt of this policy upon joining the organization.

AMIA's Board of Directors reserves the right to amend, alter, or terminate this policy at any time for any reason.