
ACG WHISTLEBLOWER PROTECTION POLICY

Reporting Responsibility. The Association for Corporate Growth, Inc. (the “Association”) expects directors, officers, employees, independent contractors and members to report suspected violation of ACG policies, including illegal or improper conduct by ACG itself, by its leadership or by others on its behalf. Suspected conduct that should be reported would include, for example:

- supplying false or misleading information on the Association’s financial or other public documents, including its Form 990;
- providing false information to or withholding material information from the Association’s independent auditors;
- destroying (other than as permitted by the Association’s Record Retention and Destruction Policy), falsifying or concealing any records that are official documents of the Association;
- embezzling or stealing the Association’s funds or other assets;
- paying for services or goods that are not rendered or delivered. or “laundering” funds;
- violating the Association’s Conflict-of-Interest Policy, Whistleblower Protection Policy, or Record Retention and Destruction Policy; and
- Facilitating or concealing any of the above or similar actions.

No Retaliation. The Association’s policy is that no director, officer, employee, independent contractor or member who in good faith reports a suspected violation will suffer harassment, retaliation or adverse consequence even if the report is mistaken, or against any other person who assists in the investigation of a reported violation. An employee, independent contractor, officer or director or member who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment or other engagement or removal from a leadership position and/or membership in the Association.. The Association reserves the right to discipline persons who make bad faith, knowingly false or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

Reporting Process. Suspected violations should be reported to the Association’s President and Chief Executive Officer or Chairman of the Board or, if both of those persons are implicated in the suspected violation, to the Association’s Vice Chairman or Chairman of Finance. Reports should identify the reporting person and describe in detail the specific facts that have caused the reporting person to suspect a violation. Reports will be kept confidential except to the extent necessary to conduct a complete and fair investigation. While a report may be submitted anonymously, the reporting person should understand that anonymity may impede the Association’s ability to conduct a complete investigation.

Response. Upon receipt of a report of a suspected violation, the Association will conduct a prompt, complete and fair investigation, consulting with outside counsel or accountants where deemed appropriate. A report of findings will be submitted to the ACG Board, with recommendations for action (if any).

This policy was adopted by the Association’s Board of Directors on February 11, 2009.