

# **Advocates International’s Whistleblower Policy**

ADVOCATES INTERNATIONAL (the “Organization”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All employees and representatives of the Organization must practice honesty and integrity in fulfilling their responsibilities and complying with all applicable laws and regulations. This is especially true because the Organization holds itself out to the public as an organization which advocates Christian values. This “Whistleblower Policy” (sometimes the “Policy”) is intended to facilitate AI’s commitment to this high ethical standard.

## **A. Reporting Responsibility**

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

## **B. Reportable Offenses**

Any director, officer, volunteer or employee (a “Reporting Individual”) may report any of the following types of activity on the part of the Organization or its directors, officers or employees:

1. Criminal activity, or other failure to comply with applicable law;
2. Fraud;
3. Accounting irregularities; or
4. Failure to abide by the Organization’s organizational documents or duly-adopted policies and procedures.

## **C. No Retaliation**

No director, officer or employee who in good faith reports a violation pursuant to this Policy shall suffer harassment, retaliation or adverse employment consequences. 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 Organization prior to seeking resolution outside the Organization.

## **D. Reporting Violations**

The Policy addresses the Organization’s open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them

properly. In most cases, this will be the Organization's Chief Executive Officer ("CEO"). However, if the CEO is believed to have participated in the violation or for some other reason the reporting individual is not comfortable speaking with the CEO, the reporting individual is encouraged to speak with the Chair of the Organization's Board of Directors (the "Board"). Any officer or director to whom a violation is reported is required to report such violation to the Organization's Compliance Officer, who has specific responsibility to investigate all reported violations. The reporting individual may contact the Organization's Compliance Officer directly (i) if the reporting individual is not satisfied with the response received from the CEO and/or Board Chair, or (ii) the reporting individual is uncomfortable speaking with the CEO and/or Board Chair, or (iii) the reporting individual suspects fraud or other wrongdoing on the part of the CEO and Board Chair.

### **E. Compliance Officer**

The Organization's Compliance Officer, who is the Chairman of the Board's Audit Committee, is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Policy. He or she shall advise the Board, the Executive Committee, and/or the Audit Committee of the Board. The Compliance Officer has direct access to the Audit Committee and is required to report to it at least annually on compliance activity.

### **F. Accounting and Auditing Matters**

The Audit Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall promptly notify the Audit Committee of any such complaint and work with the committee until the matter is resolved.

### **G. Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Policy. Any allegation that proves not to be substantiated and which proves to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **H. 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.

## **I. Handling of Reported Violations**

Except when a complaint is submitted anonymously, the Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## **J. Contact Information for Complainants**

1. Chief Executive Officer  
Brent McBurney  
Tel: (571) 319-0100  
Email: [brent.mcburney@advocates.org](mailto:brent.mcburney@advocates.org)
  
2. Board Chair  
Ruth Ross  
Tel: (519) 859-8850  
Email: [ramross@rogers.com](mailto:ramross@rogers.com)
  
3. Audit Committee Chair & Compliance  
Tim Klenk  
Tel: (239) 690-7758  
Email: [tim@klenks.net](mailto:tim@klenks.net)