



WHISTLEBLOWER POLICY

Article I Purpose

The Architectural Iron Industry Advancement Trust Fund prides itself on its adherence to federal, state, and local laws and regulations, as well as business ethics. Accordingly, the Architectural Iron Industry Advancement Trust Fund has determined to voluntarily adopt a whistleblower protection policy. This policy is intended to encourage employees and agents of the Architectural Iron Industry Advancement Trust Fund to promptly report wrongdoing to appropriate officers of the Architectural Iron Industry Advancement Trust Fund by insuring that they may do so without threat of retaliation.

Article II Financial Wrongdoing

Financial wrongdoing may include, but is not limited to:

- a. Questionable accounting practices;
- b. Fraud or deliberate error in financial statements or recordkeeping;
- c. Deficiencies of internal accounting controls; and
- d. Misrepresentations to Architectural Iron Industry Advancement Trust Fund directors, officers or the accounting department (including deviation from full reporting of financial conditions).

Article III Procedures

1. Any employee or agent of the Architectural Iron Industry Advancement Trust Fund who becomes aware of any violation of federal, state, or local law or regulations, including any financial wrongdoing, should immediately report such violation to the Executive Director, in order that the Executive Director may investigate and, if appropriate, correct the situation or condition.
2. If the Executive Director is involved or is believed to be involved in the matter being reported, the employee or agent may report to the President of the Architectural Iron Industry Advancement Trust Fund or to its legal counsel.
3. The Executive Director and/or the Board of the Architectural Iron Industry Advancement Trust Fund shall conduct and investigate such reports and shall take appropriate action within a reasonable period of time. Such reports shall be held in confidence to the extent the needs of the investigation permit.
4. The Executive Director and/or the Board of the Architectural Iron Industry Advancement Trust Fund shall take no retaliation against any employee or agent who reports in good faith what he/she believes to be a violation of law and/or financial wrongdoing to the Architectural Iron Industry Advancement Trust Fund, its officers, its legal counsel, or any federal, state or local agency, or who assists in an investigation concerning any such conduct.

Architectural Iron Industry Advancement Trust Fund

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5. Employees and agents shall keep all reported matters confidential. Questions concerning the confidentiality or appropriateness of disclosure of particular information should be directed to the President or the legal counsel of the Architectural Iron Industry Advancement Trust Fund.