



ACNM WHISTLEBLOWER PROTECTION POLICY

Consistent with the Sarbanes-Oxley Act, this Policy is intended to protect employees and others who make good faith reports about perceived financial improprieties within ACNM. In pursuit of this intention, it is our policy to:

1. Enable our employees and others to make good faith reports to the Board or Executive Committee or senior staff about any conduct or conditions that violate any laws or that impair the integrity of our financial procedures and controls.
2. Maintain a record of any good faith complaint or concern raised about the integrity of the financial procedures and controls;
3. Have the Board or Executive Committee, or a designee not involved in the complaint, address the complaint and concerns in a reasonably prompt manner;
4. Resolve such complaints or concerns with a report, as is appropriate, to the Board or Executive Committee and the complainant, including a report of any appropriate corrective action taken or planned to address the issues raised;
5. Ensure that no individual will be subject to any retaliation or adverse employee action based on the reporting such complaints or concerns in good faith.
