

WHISTLEBLOWER POLICY

Version 1
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Approving Bodies:
Audit Committee and Board of Directors

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I. PURPOSE AND SCOPE

The American Welding Society, Inc. (AWS) requires Employees, Board members and District/Section affiliated Volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As Employees and representatives of AWS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. AWS adopts this Whistleblower Policy to establish the process for reporting violations of AWS Policies and Laws. The Management Team has responsibility for oversight of compliance with this Policy and reserves the right to modify or amend this Policy at any time as it may deem necessary with approval of Board of Directors.

II. REPORTING RESPONSIBILITY

This Whistleblower Policy is intended to encourage and enable Employees and others to raise serious concerns internally, so that AWS can address and correct inappropriate conduct and actions. It is the responsibility of all Employees, Board members and District/Section affiliated volunteers to report concerns about violations of AWS policies and laws.

III. CONFIDENTIALITY

Reports of concerns and investigations pertaining thereto, shall be kept confidential, consistent with the need to conduct an adequate investigation. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment, removal from positions held within AWS, or suspension or termination of membership.

IV. REPORTING PROCEDURES

An Employee, Board member, or Volunteer who has a good faith suspicion of a violation of AWS policy or violation of any law is encouraged to report the concern to AWS' Third-Party Whistleblower Provider.

AWS has retained the services of Lighthouse, an independent third-party whistleblower provider, which ensures the anonymity of all Employees, Board Members and Volunteers. Lighthouse provides a toll-free number along with several other reporting methods, all of which are available 24 hours a day, seven days a week:

A. Telephone:

• English speaking USA and Canada: 877-280-0007

• Spanish speaking USA and Canada: 800-216-1288

• Spanish speaking Mexico: 01-800-681-5340

• French speaking Canada: 855-725-0002

B. Website: https://www.lighthouse-services.com/aws

C. E-mail: reports@lighthouse-services.com (must include company name with report)

D. Fax: (215) 689-3885 (must include company name with report)

V. INVESTIGATION OF VIOLATIONS

All reports shall be taken seriously and investigated under the supervision of the Management Team. If any member of the Management Team may be implicated in the report or alleged violation, that person shall not participate. A summary of issues will be presented to the Board of Directors and/or appropriate committees. A person or persons charged with alleged impropriety shall be given an opportunity to respond to the allegations in person or in writing.

VI. NO RETALIATION

Even if the matter is determined not to constitute improper conduct, the individual making the report will not be retaliated against. That person shall not be subject to any punishment, reprisals, or victimization – including termination, demotion, suspension, reprimand, harassment, failure to consider the Employee for promotion, or any other kind of discrimination – in retaliation for making the report in good faith.

VII. RESOLUTION

Following the investigation, AWS will:

- **A.** Provide the whistleblower, who filed the report, with a summary of the actions taken
- **B.** Take appropriate actions to deal with the issue addressed, including making operational or personnel changes, or justifying why corrections are not necessary
- C. If warranted, contact law enforcement to deal with any suspected criminal activities.

VIII. RELATED POLICIES

Important Note: This is not intended to be an exhaustive listing of policies that support the ethical conduct of AWS and Sections' activities. All AWS policies implicitly support such conduct. The following policies are considered to have specific relevance.

- AWS Employee Manual
- Employee Code of Conduct
- Board of Directors Policy Manual
- Board Travel Policy Manual
- Constitution and Bylaws of the American Welding Society
- Statement of Fiduciary Responsibility and Conflicts of Interest Policy