



Whistleblower Policy

Objective

Independent Living Alliance (ILA) requires its directors, officers, employees and contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of ILA, we must uphold honesty and integrity in all our responsibilities and comply with all applicable laws and regulations. It is the responsibility of all directors, officers, and paid and unpaid service providers to report violations or suspected violations in accordance with this Whistleblower Policy.

Reporting Responsibility

The ILA Whistleblower Policy makes it the responsibility of all directors, officers, employees and contractors to report any activities or practices that may be illegal, could result in harm to the organization or be contrary to ILA's policies, including violations related to:

Unlawful Activity

Equal Employment Opportunity

Harassment

Conflicts of Interest

Confidential or Proprietary Information

Accounting Controls and Procedures

Fraud

No Retaliation

No director, officer, employee or contractor who in good faith reports a violation shall suffer harassment, retaliation, or adverse employment consequences. This Whistleblower Policy is intended to encourage and enable directors, officers and employees to raise serious concerns within the organization prior to seeking resolution outside the organization. Any employee who believes they have been retaliated against for whistleblowing may file a complaint as set forth below. A director, officer, or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination from the organization.

Independent Living Alliance Reporting Procedures

Compliance Officer

The board of directors shall appoint a Compliance Officer who is a disinterested board member. A written report of the outcome of each investigation will be prepared and delivered to the Compliance Officer. The Compliance Officer is required to report to the board of directors at least annually on all compliance activity.

Where to Report

ILA has an open-door policy and suggests that directors, officers, employees or contractors share their questions, concerns, suggestions or complaints with someone who can address them properly.

Employees are encouraged to report any concern to their immediate supervisor. If the employee is not comfortable speaking with his or her supervisor or is not satisfied with the supervisor's response, the employee is then encouraged to speak with anyone in management whom he or she is comfortable in approaching. Board committee members are required to report suspected violations to the Compliance Officer or the President. For suspected fraud, or when an employee is not satisfied or uncomfortable with following ILA's open-door policy, individuals should contact the Compliance Officer or the Board President directly.

Directors, officers and third-party contractors shall report any activities or practices that may be illegal, could result in harm to ILA or be contrary to ILA's policies to the Compliance Officer or the Board President.

Investigation Procedures

Accounting, Audit and Financial Matters

The Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. All other matters involving potential misuse of ILA assets will be promptly investigated and reviewed by the general manager, as well as the chief financial officer, unless one of them is allegedly involved in the misconduct, in which case the report should be reviewed by only one of them. If both the general manager and the chief financial officer are alleged to be involved in the misconduct, the matter should be reported directly to the Compliance Officer or the Board President. The results of all investigations relating to the potential misuse of ILA assets shall be reported to the Compliance Officer and the Board President.

Retaliation, Employment and Other Matters

All other reports, including without limitation matters relating to harassment, retaliation, or any other matter not involving misuse of ILA assets, will be investigated by the ILA Compliance Officer. The Compliance Officer is responsible for investigating and resolving all such reported complaints and allegations and, at his or her discretion, shall advise the chief executive officer or the board president.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Each complaint will be fully investigated and, to the extent possible, handled so as to protect the privacy of the individual making the complaint, consistent with the need to conduct an adequate investigation. Reports of violations or suspected violations will be kept confidential to the extent possible.

Good Faith

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

Approved by the Board of Directors