

ADS Whistleblower Protection Policy

1. Intent

The ADS shall endeavor to protect any Director, employee or volunteer who provides substantial services to the ADS from intimidation, harassment, discrimination or other forms of retaliation on the part of the ADS, or any of its Directors, employees or volunteers, as a consequence of the good faith filing of a report relative to possible violations of any statute, regulation, applicable ethical standard or policy or procedure of the ADS.

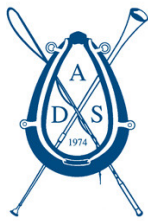
2. Disclosure

If any Director, Officer, employee or volunteer reasonable believes that some policy, practice, or activity of the ADS, or of another individual or entity with whom the ADS has a substantial business relationship exceeding ten thousand dollars (\$10,000), may violate any statute, regulation, applicable ethical standard or policy or procedures of the ADS, such individual is required to file a confidential written report summarizing his/her concerns with the Vice-President of the ADS or a designated Employee Protection Officer, as appropriate.

3. Investigation & Resolution

The investigation of any alleged misconduct or omission governed by this policy shall be conducted in the follow manner:

- a. the subject Director, Officer, employee or volunteer shall file the confidential written report with the Vice-President within thirty (30) days of witnessing the alleged misconduct or omission, whereupon said Vice-President shall act as follows:
 - i. Maintain the confidentiality of subject Director, employee or volunteer by not disclosing to other Directors, employees or volunteers of the ADS, the existence of the alleged misconduct or omission, the underlying factual circumstances of the filing of the written report, except as needed in order to properly investigate the matter;
 - ii. Conduct an appropriate investigation of the matter within approximately thirty (30) days of receipt of the written report, or as soon as practicable thereafter;
 - iii. Review the policies and procedure of the ADS, making particular note of the alleged misconduct or omission;
 - iv. Assess, in the most confidential manner possible, the concerns of the subject Director, employee or volunteer, via written questionnaire and/or interview, as well as those of other Directors, employees or volunteers who may have an understanding of, or be complicit in, the alleged misconduct or omission, in order to form an informative opinion of the matter and, if necessary, potential recommendations for resolution;



The American Driving Society, Inc.

- v. Prepare and submit a written report on the matter to either the Audit and Finance Committee or an Ad Hoc Whistleblower-Employee Protection Committee of the Board, as appropriate, together with recommendations as to resolution and a time line for implementation of recommended action; and
- vi. Forward a copy of the written report to the Entire Board of Directors.
- b. the Audit and Finance Committee or Whistleblower-Employee Protection Committee, as appropriate, shall act on the written report of the Vice-President, review findings and recommendation identified therein, and submit to the Board of Directors a written assessment of the matter, recommendations as to resolution and a timeline for implementation of recommended actions.
- c. upon receipt of the written report of the Vice-President, and the written assessment of the Audit and Finance Committee or Whistleblower-Employee Protection Committee, as appropriate, the Board of Directors, at its next scheduled Regular Meeting, or a Special Meeting called for that purpose, shall consider the matter and render binding determinations as to resolution, up to, and including, the suspension or removal of any Director, employee or volunteer of the ADS found to have engaged in the subject misconduct or omission.

4. Retaliation Protections

Upon filing a written report of alleged violation(s) of statute, regulation or applicable ethical standard, any such Director, employee or volunteer shall be protected, directly and indirectly from intimidation, harassment, discrimination or other forms of retaliation on the part of the ADS or any of its Directors, employees or volunteers.

5. Documentation

The Board of Directors shall assure that the matter is properly documented in the records of the ADS, including minutes of any meeting of any Committee and the Board where the matter was considered and/or addressed, paying particular attention to the confidentiality of this policy.

6. Limitations

This policy does not protect any Director, employee or volunteer of the ADS acting in bad faith; who is deliberately dishonest; and/or, has personally garnered profit, or some other advantage, to which he/she is not legally entitled. No Director, employee or volunteer should expect protection under this policy if he/she is complicit in the misconduct or omission that is the subject of his/her concern, unless his/her complicity is, itself, prompted by duress or is motivated by reasonable fear of some form of intimidation, harassment, discrimination or other form of retaliation.

7. Publication

A copy of the policy shall be distributed to all Directors, employees and volunteers who provide substantial service to the ADS.