

MOTHERS AGAINST DRUNK DRIVING WHISTLEBLOWER POLICY

General

Mothers Against Drunk Driving (“MADD”) is committed to conducting its business lawfully and ethically. Employees, volunteers, officers, and members of the Board of Directors (“MADD Representatives”) shall fulfill their responsibilities with both honest intent and integrity and comply with all applicable federal, state, and local laws. While conducting MADD business, MADD Representatives shall conduct themselves in a manner that is ethical and professional.

Reporting Responsibility

MADD Representatives are obligated to report, in accordance with this *Whistleblower Policy* (“Policy”), any known violations of federal, state and local laws, or any complaints regarding MADD’s accounting practices, internal accounting controls, corporate governance, ethics or auditing matters as soon as reasonably possible following the discovery or belief that a violation may have occurred (violations, complaints or concerns are hereinafter referred to as “Complaints”).

Acting in Good Faith

Anyone reporting a Complaint must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Policy Manuals. The act of making allegations that prove to be unsubstantiated ***and*** that are proven to have been made maliciously, recklessly or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline up to and including dismissal from the volunteer position or termination of employment. Such action may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of Complaints and any investigations pertaining thereto shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation (as further explained below). Disclosure of reports of Complaints to individuals not involved with the investigation and/or who have no need to know will be viewed as a serious disciplinary offense and may result in discipline up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

NO RETALIATION

Retaliation of any kind against employees for Complaints submitted in good faith and pursuant to the above procedures, shall not be tolerated and shall result in disciplinary action.

Procedure

The MADD Board Audit Committee has established the following procedures for: (a) the receipt, retention, and treatment of Complaints received by MADD and (b) the submission of Complaints on a confidential and anonymous basis.

1. Complaints shall be submitted in writing via letter or email and directed to MADD's, General Counsel (hereto referred to as "Compliance Officer").
2. Following the receipt of a Complaint, the Compliance Officer shall oversee the investigation of each alleged offense. The Compliance Officer shall report to the Chairperson of the Audit Committee the Complaint and the Compliance Officer's findings as a result of the investigation. Should it be determined by the Chairperson of the Audit Committee that further investigation is required, the Compliance Officer shall conduct, or have conducted, further investigation.
3. Instead of reporting a Complaint directly to the Compliance Officer, any MADD employee or volunteer may submit, on a confidential and/or anonymous basis, any Complaint to the Human Resources Director.
4. A summary of each allegation shall be prepared by the Human Resources Director and submitted to the Chairperson of the Audit Committee and the Compliance Officer for investigation. If the complainant desires to discuss the allegations with the Chairperson of the Audit Committee or the Compliance Officer, the employee or volunteer shall indicate this desire in the submission and include contact information. The Chairperson of the Audit Committee or the Compliance Officer shall make the final determination as to whether this additional communication shall occur.
5. It shall be the right of the Audit Committee and the Compliance Officer to enlist MADD's employees, outside legal counsel, investigators, accounting or other advisors, as appropriate, to conduct any investigation of Complaints. Throughout the investigation, the Audit Committee and the Compliance Officer shall use reasonable care to protect the confidentiality and anonymity of the complainant.
6. **Document Retention**

All Complaints shall be retained for a period of seven (7) years and maintained with the records of the Audit Committee. If a discrepancy is found between the retention periods of a separate MADD document retention policy and this *Whistleblower Policy*, the retention period of the *Whistleblower Policy* shall take precedence.