



## **INTERNATIONAL ORTHOPAEDIC DIVERSITY ALLIANCE WHISTLEBLOWER POLICY**

**Dated Developed:** 12.09.2021

**Approved by the Board of Directors:** 12.09.2021

### **1. PURPOSE**

ORGANIZATION (hereinafter known as the "Organization") requires board members, committee members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee members and employees to comply with all applicable laws and regulatory requirements.

### **2. REPORTING RESPONSIBILITY**

The Organization seeks to have an "Open Door Policy" and encourages board members, committee members and employees to share their questions, concerns, suggestions, or complaints regarding the Organization and its operations with someone who can address them properly. In most cases, a board member, committee member or an employee should present his or her concerns to the President of the Board. However, if a board member, committee member or employee is not comfortable speaking with the President of the Board or is not comfortable with the President's response, the board member, committee member or employee is encouraged to speak with anyone on the Board whom they are comfortable in approaching, or to directly contact the Organization's outside legal counsel, whose contact information can be obtained from the President.

### **3. NO RETALIATION**

No board member, committee member, or employee who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

### **4. COMPLIANCE OFFICER**

The Organization's President will act as the Organization's Compliance Officer. The Compliance Officer is responsible for investigating and resolving all employee complaints and allegations concerning violations of the Principles and/or Code. Outside legal counsel or another board member will carry out the functions of the Compliance Officer if the complaint involves the President.

### **5. ACCOUNTING AND AUDITING MATTERS**

The Compliance Officer shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing and shall immediately notify the Board of Directors of any such complaint and work with the Board until the matter is resolved.

### **6. REQUIREMENT OF GOOD FAITH**

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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.

### **7. CONFIDENTIALITY**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

#### **8. HANDLING OF REPORTED VIOLATIONS**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.