

WHISTLEBLOWER POLICY

This Whistleblower Policy of the Alliance for Telecommunications Industry Solutions (ATIS): (1) encourages members and staff to come forward with credible information on illegal practices or serious violations of adopted policies of the organization; (2) specifies that ATIS will protect the person from retaliation; and (3) identifies where such information can be reported.

1. **Encouragement of reporting.** ATIS encourages complaints, reports or inquiries about illegal practices or serious violations of ATIS' policies, including illegal or improper conduct by ATIS itself, by its leadership, or by others on its behalf. Illegal practices or serious violations would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects for which ATIS has existing complaint mechanisms should be addressed under those mechanisms, such as matters of alleged discrimination or harassment via ATIS' human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.
2. **Protection from retaliation.** ATIS prohibits retaliation by or on behalf of the organization against members or staff for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. ATIS reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.
3. **Where to report.** Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to the President and CEO or to the General Counsel. If both of those persons are implicated in the complaint, report or inquiry, it should be directed to the Chairman of the Board of Directors. Any information received under this procedure shall be provided to ATIS' Finance Committee, under whose direction ATIS will conduct a prompt, discreet, and objective review or investigation. Staff or members must recognize that the organization may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

A copy of this policy shall be distributed to all directors, officers, employees, and volunteers who provide substantial services to ATIS.

Effective: June 30, 2014