



American Academy of Clinical Toxicology Whistleblower Policy

The American Academy of Clinical Toxicology (AACT) is committed to lawful and ethical behavior in all of its activities and requires that its trustees, employees, and consultants (collectively, "AACT Persons") conduct themselves in a manner that complies with all applicable laws and regulations. Set forth below is AACT's policy with respect to reporting good faith concerns about the legality or propriety of AACT actions or plans.

I. Reporting

An AACT Person who has a good faith concern regarding the legality or propriety of any action contemplated to be taken or taken by AACT or another AACT Person, or a good faith belief that action needs to be taken for the AACT to be in compliance with laws, policies, or ethical standards, should promptly advise AACT's Executive Director. If management is unresponsive, the AACT Person should report his/her concerns to the Finance and Audit Committee chairman. Reports can be made verbally or as an alternative, in writing, in person, or anonymously.

II. Investigation

AACT will investigate these reports with care. AACT's interest in being thorough in its investigation means that it cannot promise complete confidentiality, but it will act as discreetly as reasonably possible. If as a result of the investigation AACT discovers a problem, it will promptly alert the Finance and Audit Committee Chairman and take corrective action as it deems necessary.

III. Retaliation

AACT will not discharge, threaten, or discriminate against an AACT Person in any manner for his/her reporting in good faith what he/she perceives to be a wrongdoing, violation of law or regulation, or other unethical or illegal conduct. AACT will impose disciplinary measures, up to and including termination, against anyone who threatens or retaliates against an AACT Person who makes such a good faith report.

IV. Examples of Fraudulent Conduct or Impropriety

The following is a non-exhaustive list of the kinds of improprieties that should be reported:

- Forgery or alteration of documents;
- Abuse, inappropriate activity with a program participant;
- Fraudulent financial reporting;
- Misappropriation or misuse of AACT resources, such as funds, supplies, other assets;
- Violations of AACT's Conflict of Interest Policy;
- Authorizing or receiving compensation for goods not received, services not performed, or hours not worked; and,
- Facilitating or concealing any of the above or similar actions.

AACT reserves the right to amend and/or supplement this policy at any time.

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with an opportunity to ask questions about the policy.

Trustee/Employee Signature

Date