

American Skin Association

Whistleblower Policy

ARTICLE I

PURPOSE

This whistleblower policy is designed to encourage and enable directors, officers and employees of American Skin Association (“ASA”) to make good faith reporting of wrongful conduct and to protect individuals who make such reports from retaliation. This policy is intended to supplement but not replace any applicable laws governing nonprofit organizations.

ARTICLE II

POLICY

1. Wrongful Conduct Defined. For purposes of this policy, “wrongful conduct” includes any violation of applicable law or regulations or any material violation of ASA’s operating policies. Examples of wrongful conduct that this policy is intended to address include, but are not limited to:
 - Falsification of ASA’s financial reports, tax returns or other financial documents;
 - Non-compliance with ASA’s legal responsibilities;
 - Misappropriation of funds or theft of ASA property; or
 - Material violations of conflict of interest, document retention or other ASA policies.
2. Reporting Wrongful Conduct; Confidentiality. Any director, officer or employee of ASA may report wrongful conduct to Nora Jordan. In making a complaint or submission, a director, officer or employee may request to be treated in a confidential manner. Although reports may be made anonymously, those reporting wrongful conduct are encouraged to disclose their identity to facilitate any resulting investigation. Confidentiality will be maintained throughout the investigation to the extent reasonable and practicable under the circumstances, consistent with the need to conduct an adequate investigation.
3. Acting in Good Faith. Anyone filing a complaint concerning wrongful conduct must act 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.
4. Handling of Reported Wrongful Conduct. Nora Jordan will notify the complainant and acknowledge receipt of the reported violation or suspected violation. Nora Jordan is responsible for supervising and directing a prompt investigation of any reported wrongful conduct. The scope of the investigation will be dependent on the nature of the concern. A report of the conclusions of the investigation will be made to the Audit Committee of the

Board, and the Audit Committee will determine what disciplinary and corrective action, if any, shall be taken.

5. Retaliation Prohibited. Intimidation, coercion, threats, or discrimination against any individual who reports suspected wrongdoing is prohibited. An employee who retaliates against someone who has reported wrongful conduct in good faith will be subject to appropriate disciplinary action, which may include termination.
6. Availability and Periodic Review of Policy. This policy shall be made available to all Directors, Officers, employees and volunteers of ASA through distribution of the policy to such persons or through posting on the ASA's website or in a conspicuous location accessible to employees and volunteers. The Board shall review this policy periodically. Any changes to this policy shall be communicated to all appropriate directors, officers, employees and volunteers of ASA through any of the foregoing methods of notification.

Date Initial Whistleblower Policy Was Adopted: April 22, 2014

Date of Amendments by Board: April 20, 2016