

The American Institute of Architects Japan Chapter (AIA Japan) Whistleblower Policy

Purpose

The American Institute of Architects Japan Chapter (AIA JAPAN) is open and accountable to its members and employees. The AIA JAPAN Board of Directors expects all AIA JAPAN volunteers and employees to obey the law and act ethically. It also expects employees to report honestly to their supervisors. It requires that volunteers and employees contact senior management, legal counsel, or AIA JAPAN officers, as appropriate, about any activity that they think might violate law, policy, or ethical standards.

This policy is intended to cover serious concerns that could affect the AIA JAPAN. These include actions that:

- could lead to inaccurate financial reporting;
- are unlawful, such as fraud, theft, embezzlement, or other illegal activities;
- are inconsistent with policies or procedures;
- otherwise amount to serious misconduct, such as unethical business conduct, other inappropriate conduct, or concerns about employee health risks that are caused by or are otherwise under the control of AIA JAPAN management. (Such health concerns might arise, for example, if AIA JAPAN management were to permit asbestos-containing insulation to be removed without properly protecting employees);
- result in the destruction of documents in a manner inconsistent with the AIA JAPAN's records retention policy; or
- result in the inappropriate or illegal use of AIA JAPAN property (e.g., using AIA JAPAN property for personal gain).

The policy is intended to encourage and enable you and others to raise serious concerns within the AIA JAPAN before seeking action from outside sources.

Protecting Your Confidentiality

Every effort will be made to protect your confidentiality, and the AIA JAPAN will not tolerate harassment or retaliation of any sort against anybody submitting a report under this policy. While anonymous reports will be accepted, you are encouraged to identify yourself in order to strengthen the credibility of your report and to help the follow-up investigation. Malicious or knowingly false reports, however, may result in disciplinary action, up to and including termination of your employment or service as a volunteer.

Reporting a Violation

You should follow these guidelines when reporting a violation under this policy:

- Where possible, if you are an employee, you should report the violation initially to your direct supervisor. In most cases, your supervisor should be in the best position to address an area of concern.
- If you are a volunteer, or if you are an employee who is not comfortable speaking with your supervisor about a violation, you are encouraged to speak with the General Counsel. If you are not comfortable speaking with the General Counsel, you may speak with the Executive Vice President/CEO.
- This policy requires every supervisor or other manager to report suspected violations to the General Counsel. The supervisor should not have anything else to do with the matter unless directed by the General Counsel.
- Except under extraordinary circumstances, the President and the Executive Vice President/CEO will be informed when a report is received. Other persons may also be notified on a need-to-know basis.

Reporting Violations Concerning Fraud or Financial Matters

If the violation you are reporting has to do with fraud or financial misconduct, you may follow the procedures shown above. In the alternative, you may contact the AIA JAPAN's Treasurer.

Investigation and Report

The following guidelines apply to investigations:

- The General Counsel has specific and exclusive responsibility to investigate all reported violations. If the General Counsel finds it appropriate to recuse him/herself, he/she will retain impartial outside counsel or auditors to conduct the investigation.
- To the extent possible, your report will be acknowledged within 5 business days. You will also be informed about next steps and about when you may expect to hear more about the investigation of your reported allegations.
- The General Counsel will conduct a prompt investigation, while doing everything possible to keep your identity and role confidential. (You should be aware, however, that legal requirements or other circumstances may make it impossible to fully protect confidentiality in some cases.) You will be notified within 2 weeks if a broader investigation appears to be needed.
- You are not expected to prove the truth of your allegations. You should, however, be prepared to be interviewed (unless your report is anonymous) and to submit whatever evidence is available to support the allegations.
- The General Counsel will submit a written report, which will include a summary of the allegations and his or her recommendations, to members of the AIA JAPAN executive management who have a reasonable need to review the report, to the Executive Committee, and/or to the Board of Directors, as appropriate. You will be informed about the results of the report.
- Where appropriate, corrective action will be taken. The action taken will depend on how serious the pertinent violation is and may include such things as a warning, a letter of reprimand, suspension with or without pay, or termination of employment. In the case of a volunteer, corrective action may include such things as limitations on the volunteer's opportunity to serve on AIA JAPAN committees, or the initiation of a complaint with the National Ethics Council, as appropriate.

Contacts of AIA JAPAN Officers

If the process described above is not followed after you have submitted a report, you may contact the President of AIA Japan. If you are not comfortable contacting the President, you may contact the Vice President.