

ALPHA OMICRON PI PROPERTIES, INC. WHISTLEBLOWER POLICY

Adopted December 1, 2009 by AOII Properties Board

General

The Alpha Omicron Pi Properties, Inc. requires board members, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the AOII Properties, Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all board members, officers, and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No board member, officer, or employee who in good faith reports an ethics violation shall suffer harassment, retaliation, or adverse employment consequences. 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. A board member who retaliates against someone who has reported a violation in good faith is subject to discipline as set forth in the AOII Properties Bylaws. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Fraternity prior to seeking resolution outside the Fraternity.

Reporting Violations

The AOII Properties has an open door policy and encourages employees, board members, and volunteers to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the AOII Properties Executive Director is in the best position to address an area of concern. If you are not comfortable speaking with the AOII Properties Executive Director or you are not satisfied with the AOII Properties Executive Director's response, you are encouraged to speak with the AOII Properties President. The AOII Properties Executive Director is required to report suspected ethics violations to the AOII Properties President, who has specific and exclusive responsibility to investigate all reported violations. To report concerns, visit www.alphaomicronpi.org/about/policies.

Accounting and Auditing Matters

The Budget and Finance Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Fraternity Controller shall immediately notify the Budget and Finance Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Anyone filing allegations that prove not to be substantiated and/or which prove to have been made maliciously or knowingly to be false will be subject to disciplinary action.

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, and to comply with fiduciary obligations and applicable state and federal laws and regulations.

Handling of Reported Violations

The AOII Properties Executive Director or AOII Properties President will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.