



ASSOCIATION OF UNIVERSITY TECHNOLOGY MANAGERS POLICY

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Whistleblower Policy	<i>Approved by the AUTM Board of Directors: November 2010</i>
	<i>Amended by the AUTM Board of Directors: May 19, 2016</i>

A whistleblower is an employee, volunteer, Officer or Director of AUTM, or an employee of The Kellen Company (Kellen), who reports an activity that he/she considers to be dishonest, fraudulent, or a violation of federal, state or local laws. If such an employee (AUTM or Kellen), volunteer, Officer, Director has knowledge or a concern of illegal, dishonest, or fraudulent activity, he/she should contact the AUTM President (or other Director if the President is the subject of the complaint) and AUTM's Kellen Managing Partner (or other Kellen Officer if the Managing Partner is the subject of the complaint).

Anyone filing a complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation. All reports of illegal and dishonest activities will be promptly submitted to the President and Kellen Managing Partner, who will oversee an investigation and coordinate any corrective action, if needed.

Whistleblower protections are provided in two areas — confidentiality and against retaliation. As much as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. Additionally, AUTM will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of removal from the Board of Directors. If the complaining party is an employee, AUTM will not retaliate against the employee or against Kellen, provided appropriate corrective action is taken.