



BRAILLE INSTITUTE OF AMERICA, INC.
WHISTLEBLOWER POLICY

Braille Institute of America, Inc. (“BIA”) is committed to integrity and ethical behavior. BIA thus encourages any employee, student, board member, library patron, donor or volunteer who reasonably believes that he or she is aware of any unethical, illegal, or fraudulent activity (“Misconduct”) to disclose such Misconduct, without fear of retaliation, discrimination, or harassment.

BIA strictly prohibits any retaliation, discrimination, or harassment against any employee or non-employee who reports what he or she reasonably believes to be Misconduct such as questionable accounting practices or the reporting of fraudulent financial information. Nor will BIA retaliate against any person who participates in an investigation of such complaints.

An individual who becomes aware of any Misconduct is encouraged to report such Misconduct as soon as possible to one of the following: the Chair of BIA’s Board of Directors (“Board Chair”), the Chair of BIA’s Audit Committee (“Audit Committee Chair”), or any Corporate Officer (President, CFO, or Secretary). Reports may be provided in writing, telephonically, by email, or in person. Reports should be as complete as possible, including the details of the incident, names of the individuals allegedly involved, dates, and the names of any witnesses. Reports may be anonymous.

BIA shall maintain a toll-free hotline as an alternative means of receiving Misconduct reports.

If any of the persons identified above receives a Misconduct report, he or she shall promptly notify the General Counsel. Within five (5) business days after receiving a Misconduct report, the General Counsel will (i) notify the President, the Board Chair, and, if the report relates to internal controls or accounting practices, the Audit Committee Chair, that a Misconduct report has been received; and (ii) contact the complainant and acknowledge receipt of the report, but only to the extent that the complainant’s contact information is provided. The General Counsel is responsible for promptly investigating all Misconduct reports for the purpose of providing legal advice regarding the complaint including appropriate corrective action to be taken if so warranted. In consultation with the President and the Board Chair, the General Counsel may determine to conduct the investigation through a designee who may be an investigator external to BIA but under the direction of the General Counsel or other legal counsel. The complainant is to be kept apprised of any action to be taken to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no further action or investigation is to be taken, an explanation shall be given to the complainant. The General Counsel shall be responsible for periodically updating the President, the Board Chair, and, if the Misconduct report relates to internal controls or accounting practices, the Audit Committee Chair, on the status of any investigation.

Any complaint of retaliation, discrimination or harassment following a Misconduct report shall also be investigated by the General Counsel. If a complaint of retaliation, discrimination or harassment is substantiated, appropriate disciplinary action, up to and including termination of the offending party's status as an employee, student, board member, library patron, volunteer, or otherwise, may be taken.

In the event the General Counsel is suspected of Misconduct or of retaliation, discrimination or harassment or is otherwise unable to conduct the investigation, then the Chief Financial Officer or the head of human resources shall conduct the investigation in accordance with this policy.

Any corrective or disciplinary action taken as the result of an investigation into Misconduct or retaliation, discrimination or harassment shall first be approved by BIA's General Counsel and/or outside legal counsel.

Nothing in this policy is intended to prevent an individual from reporting information to a government or law enforcement agency, when the person reasonably believes that BIA has violated a federal or state statute, rule, or regulation.