

**ENGINE MANUFACTURERS ASSOCIATION
Whistleblower Policy**

Policy

EMA is committed to preventing reprisals against staff and members who report activity undertaken by other EMA staff or members in connection with the performance of official EMA activity that may be in violation of any state or federal law or related regulation (“Protected Disclosure”).

EMA, and any individual associated with EMA, will not:

- retaliate against staff or members who have made a Protected Disclosure or who have refused to obey an illegal or unethical request, or otherwise harass or cause such persons to suffer adverse employment consequences; or
- directly or indirectly use or attempt to use the official authority or influence of their position for the purpose of interfering with the right of staff or members to make a Protected Disclosure to EMA leadership.

Reporting Violations

EMA has an open door policy and suggests that staff and members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an EMA officer is in the best position to address an area of concern. However, individuals should always feel free to contact EMA’s Compliance Officer directly, if they so choose. Officers are required to report suspected violations to EMA’s Compliance Officer, who has the responsibility to investigate all reported violations.

Compliance Officer

EMA’s Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning Protected Disclosures and, at his or her discretion, shall advise the President and/or the Executive Committee. The Compliance Officer has direct access to EMA’s Executive Committee. EMA’s Compliance Officer is EMA’s Treasurer.

Accounting and Auditing Matters

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

Confidentiality

Protected Disclosures 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.

Handling of Reported Violations

The Compliance Officer will promptly notify the sender and acknowledge receipt of a Protected Disclosure (unless such report was submitted anonymously). All reports will be investigated promptly and appropriate corrective action will be taken if warranted by the investigation.

Adopted: May 25, 2005

EMADOCS: 6972.1