

INTERNATIONAL CLIENT COUNSELING COMPETITION

WHISTLEBLOWER PROTECTION POLICY

The International Client Counseling Competition (the “*ICCC*”) requires directors, 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 *ICCC*, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that *ICCC* can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of *ICCC*'s code of ethics or suspected violations of law or regulations that govern *ICCC*'s operations.

No Retaliation

It is contrary to the values of *ICCC* for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of *ICCC*. 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.

Reporting Procedure

ICCC has an open-door policy and volunteers and employees are encouraged to speak with the President or other Officer of the organization, or a board member, if involving the board would be appropriate. All officers and board members are required to report complaints or concerns about suspected ethical and legal violations in writing to the *ICCC*'s Secretary, who serves as our compliance officer, and who has the responsibility to investigate all reported complaints.

The *ICCC*'s Secretary is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Secretary will advise the President of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The *ICCC*'s Treasurer shall immediately notify the President and Executive Chair of the Board of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written 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. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. 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 ICCC's Secretary will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.