

Statement of Operating Procedures:

9. Whistleblower Policy

The Hillcrest Business Association requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the Hillcrest Business Association practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

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

No director, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or an adverse employment consequence. 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within The Hillcrest Business Association prior to seeking resolution outside The Hillcrest Business Association.

The Hillcrest Business Association has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if employees are not comfortable speaking with their supervisor or they are not satisfied with their supervisor's response, they are encouraged to speak with the President of the Hillcrest Business Association or anyone on the Executive Committee whom they are comfortable in approaching. Supervisors and managers are required to report suspected ethics violations to the Hillcrest Business Association Compliance Officer, is responsible for investigating all reported violations. For suspected fraud, or when employees are not satisfied or are uncomfortable with following the Hillcrest Business Association's open door policy, individuals should contact the Compliance Officer directly.

The Hillcrest Business Association Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Executive Director and/or the Finance Committee. The Compliance Officer has direct access to the Finance Committee of the Board of Directors and is required to report to the Finance Committee at least annually on compliance activity. The Hillcrest Business Association Compliance Officer is the Vice President.

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

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.

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.

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.

The Compliance Officer 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.

Approved: 12/14/10