



## Whistleblower Protection Policy

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The Society for Vascular Surgery® (SVS) is committed to preventing reprisals against employees and members who report activity undertaken by the Society's employees and/or members in connection with: (i) the performance of official SVS activity that may be in violation of state or federal law, or (ii) questionable corporate accounting practices, internal controls, or audit matters ((i) and (ii) above are collectively referred to as "Protected Disclosure").

## SVS, and Any Individual Associated with SVS, Will Not:

Take any retaliatory action against an employee or member who has made a Protected Disclosure or who has refused to obey an illegal or unethical request, including interference with their lawful employment or livelihood;

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 an employee or member to make a Protected Disclosure to SVS leadership.

## Reporting Violations

SVS has an open door policy and suggests that employees and members 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, individuals should always feel free to contact SVS's Compliance Officer or Executive Director directly, if they so choose. Supervisors are required to report suspected violations to SVS's Compliance Officer, who has the responsibility to investigate all reported violations in accordance with this policy.

## Compliance Officer

SVS's Compliance Officer is the Chair of SVS's Audit Committee. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning Protected Disclosures and, depending on the nature of the complaint (as set forth below), shall advise the Executive Director, Board of Directors, and/or the Audit Committee.

The Compliance Officer shall immediately notify the Audit Committee of all reported concerns or complaints concerning Protected Disclosures regarding financial wrongdoing, corporate accounting practices, internal controls, or auditing. The Compliance Officer shall refer all other issues to either the Executive Director or the Board of Directors, as the Compliance Officer determines to be appropriate.

## Accounting and Auditing Matters

The Audit Committee shall address all reported concerns or complaints concerning financial wrongdoing, corporate accounting practices, internal controls, or auditing. The Compliance Officer shall work with the committee until such matters are 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). Reports and copies of Protected Disclosures shall be retained by SVS in accordance with applicable record retention policies.