



## WHISTLE BLOWER POLICY

### 1. PURPOSE

This Whistleblower Policy (the “Policy”) ensures Huntington’s Disease Society of America’s (the “Company”) Board of Trustee members, directors, officers, employees and volunteers (“Company members”) provide high standards of business and personal ethics in the conduct of their duties and responsibilities. All employees and representatives of the Company must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

### 2. SCOPE

This Policy applies to all Company members including temporary employees.

### 4. OWNERSHIP AND RESPONSIBILITIES

It is the responsibility of all Company members to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

### 5. NO RETALIATION

No Company member who in good faith reports an ethics violation shall suffer harassment, retaliation or 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 Company prior to seeking resolution outside the Company.

### 6. REPORTING VIOLATIONS

**6.1** The Company 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 you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with a member of the Administration Department or anyone in senior management whom you are comfortable approaching.

Board approved version 6/6/09

505 Eighth Avenue, Suite 902, New York, NY 10018 | T. 1 800.345.HDSA (4372) F. 212.239.3430 | [www.hdsa.org](http://www.hdsa.org)



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**6.2** Supervisors and managers are required to report suspected ethics violations to the Administration Department, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Company's open door policy, individuals should contact the Chief Executive Officer directly.

**6.3** The Secretary of the Board of Trustees is the Board designee for this policy and can be contacted if all other avenues have been exhausted.

## **7 ACTING IN GOOD FAITH**

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 offense subject to disciplinary or legal actions.

## **8 CONFIDENTIALITY**

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **9 HANDLING OF THE VIOLATIONS**

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## **10 ANONYMOUS CORRESPONDENCE MAILING ADDRESS**

Huntington Disease Society of America  
505 Eighth Avenue  
New York, NY 10018  
Attention: Administration Department

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