

WHISTLEBLOWER POLICY
for
INDEPENDENT INSURANCE AGENTS & BROKERS OF AMERICA, INC.
BIG “I” ADVANTAGE, INC.
IIAA AGENCY ADMINISTRATIVE SERVICES, INC.
IIAA MEMBERSHIP SERVICES, INC.
TRUSTED CHOICE®
INVEST
IIAA EDUCATIONAL FOUNDATION

Effective as of April 1, 2021

This Whistleblower Policy (“Policy”) of the Independent Insurance Agents & Brokers of America, Inc. and its subsidiaries and affiliates referenced above (collectively “IIABA”) encourages staff and volunteers to come forward with information on illegal practices or violations of adopted policies of IIABA, specifies that IIABA will protect the person(s) coming forward from intimidation, harassment, discrimination, retaliation, or adverse employment consequences, and identifies to whom such information can be reported.

1. **Encouragement of reporting.** IIABA encourages complaints, reports or inquiries (collectively “Reports”) about violations or suspected violations of law or IIABA policies, including illegal or improper conduct by IIABA, its leadership, or others acting on its behalf. Appropriate subjects to raise under this Policy include financial improprieties (such as but not limited to fraudulent expense reports, theft of funds or equipment, etc.); misuse of assets; accounting or audit matters; ethical violations; or other illegal or improper actions, practices, or policies. Other subjects on which IIABA has existing complaint mechanisms should be addressed under those mechanisms, unless those channels are themselves implicated in the wrongdoing. This Policy is not intended to provide a means of appeal from outcomes subject to other appropriate complaint mechanisms.

2. **Protection from retaliation.** IIABA prohibits intimidation, harassment, discrimination, retaliation, or adverse employment consequences by or on behalf of IIABA against its staff or volunteers for making good faith Reports under this Policy or for participating in a review or investigation under this Policy. This protection extends to those whose Report allegations are made in good faith but prove to be mistaken. IIABA reserves the right to discipline staff and take other appropriate action against volunteers who make bad faith, knowingly false, or vexatious Reports or who otherwise abuse this Policy.

3. **Where to report.** Reports can be made at any time, and, if the staff or volunteer making Reports wish, can be made under this Policy with requests for the Reports to be on a confidential or anonymous basis. IIABA will, upon receiving such requests, keep the identity of the makers of any Reports confidential to the extent possible, subject to IIABA’s obligation to conduct a full and fair investigation. Reports should describe in detail the specific facts demonstrating or giving rise to the bases for the allegations. Reports should be directed to IIABA’s Chief Executive Officer or General Counsel, unless both of those persons are implicated in the Reports, in which case the Reports should be directed to IIABA’s Chairman. IIABA will conduct a prompt and objective investigation of Reports, based on the allegations detailed, and provide a report to the board or its designated committee. Staff and volunteers must recognize that IIABA may be unable to fully evaluate vague or general Reports made anonymously.