



Whistleblower Protection Policy

ACAMS expects its officers, directors and employees to adhere to the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As employees of ACAMS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

“ACAMS” as used herein, shall be inclusive of Alert Global Media, LLC, the sole member of Association of Certified Anti-Money Laundering Specialists, LLC, and its and their direct and indirect wholly owned subsidiaries.

Reporting Responsibility

This Whistleblower Protection Policy is intended to encourage and enable internal and external stakeholders to raise serious concerns so that ACAMS can address and correct inappropriate conduct and actions. It is the responsibility of all ACAMS officers, directors and employees to report concerns about violations of ACAMS’s Code of Conduct or suspected violations of law or regulations that govern ACAMS’s operations.

No Retaliation

It is contrary to the values of ACAMS for anyone to retaliate against any board member, officer, and employee 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 ACAMS. 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

ACAMS has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. 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 Legal & Compliance or Human Resources team members.

Employees can also report any concerns or violation anonymously through the following channels:

 Toll-free Telephone: English-speaking U.S. and Canada: 833-203-6447	 Email: reports@lighthouse- services.com
 Online: https://www.lighthouse- services.com/acams	 Fax: 215-689-3885 - must include company name with report.

Acting in Good Faith

Anyone filing a written or oral 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 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. Confidentially submitted reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct a proper investigation.

The following information will be kept as confidentially as possible. Where applicable law requires absolute confidentiality, this information will be kept absolutely confidential:

- i. Your identity;
- ii. The identity of the person or persons targeted in your report and of any third party mentioned in the report;
- iii. And more generally, the information contained in your report, i.e., the conduct forming the basis of the report.

You may be asked to waive confidentiality in order to further facilitate an investigation. You will have no obligation to waive confidentiality and any decision to maintain confidentiality will not subject you to disciplinary action.

Handling of Reported Violations

ACAMS will acknowledge receipt of the reported violation or suspected violation as soon as possible. Where applicable law requires that ACAMS acknowledge receipt of a complaint within a

set period of time, ACAMS shall acknowledge the complaint no later than **seven (7) days** after receipt of the complaint. ACAMS' acknowledgement of a complaint does not mean ACAMS necessarily agrees with the facts alleged.

Investigation of a complaint is the second stage in the process. ACAMS will promptly investigate all complaints in order to determine their veracity and any subsequent action to be taken (internal investigation, judicial procedure, etc.). ACAMS will also determine any remedial action that should be implemented. The Legal & Compliance team may carry out the investigation by itself, through internal resources, or by engaging external counsel.

Additionally, information may be communicated throughout the investigation.

ACAMS will communicate any findings applicable to the complainant to the complainant. Where applicable law requires that a complainant be informed of the results of an investigation, complainant will be informed of the results of the investigation no later than **three months** after the conclusion of the investigation. The complainant will also be informed if the matter is closed, or the facts alleged are found to be inaccurate.