



Federal Bar Association

Policy No. 1-8: Whistleblower

Approved By: Board of Directors

Date Approved: January 29, 2011

Date Effective: January 29, 2011

Policy:

The Federal Bar Association requires officers, directors, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees of the Association, they must practice honesty and integrity in fulfilling their responsibilities and complying with all applicable laws and regulations.

Reporting Responsibility

If any officer, director, or employee reasonably believes that some policy, practice or activity of the Federal Bar Association is in violation of a law or public policy, a complaint should be made in accordance with the section on Reporting Violations below.

No Retaliation

No officer, director, or employee who in good faith reports a 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 Association prior to seeking resolution outside the Association.

Reporting Violations

The 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 the employee is not comfortable speaking with his or her supervisor or the employee is not satisfied with the supervisor's response, the employee is encouraged to speak with the Executive Director or Deputy Executive Director whom the employee is comfortable in approaching. Management is required to report suspected violations to the Association's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when the individual is not satisfied or uncomfortable with following the Association's open door policy, individuals should contact the Association's Compliance Officer directly.

Compliance Officer

The Association's Compliance Officer is the chair of the Audit Committee. The Association's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of this Whistleblower Policy and, at his/her discretion, shall advise the Executive Director and/or the Audit Committee. The Compliance Officer has direct access to the Audit Committee and is required to report to the Audit Committee at least annually on compliance activity.

Accounting and Auditing Matters

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

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 disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. 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 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.

Purpose:

The purpose of this policy is intended to encourage and enable employees and others to raise serious concerns within the Association prior to seeking resolution outside the Association.

Change Notice: Amended 6/21/2014