



Whistleblower Policy for Washington Council of Lawyers

Adopted March 12, 2020

The purpose of this Whistleblower Policy (this "Policy") is to comply with all applicable laws and regulations and to encourage and enable our directors, officers, employees, and volunteers ("Covered Persons") to raise within Washington Council of Lawyers serious concerns about the occurrence of illegal or unethical actions involving Washington Council of Lawyers.

Reporting Responsibility and Process

Covered Persons have a responsibility to report any action or suspected action taken within Washington Council of Lawyers that is illegal, unethical or violates any adopted policy of Washington Council of Lawyers ("Violations") by contacting the Executive Director, or if she or he does not feel that contacting the Executive Director is appropriate under the circumstances, the President of the Board of Directors, or any officer of Washington Council of Lawyers.

Washington Council of Lawyers encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted anonymously by mailing a printed report to the Executive Director, the President of the Board of Directors, or any officer of Washington Council of Lawyers. Reports will be kept confidential, to the extent possible, consistent with the need to conduct an adequate investigation.

Anyone reporting a Violation must act in good faith, without malice to Washington Council of Lawyers or any individual in Washington Council of Lawyers, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred or may occur.

The Executive Director, the President of the Board of Directors, or any officer, as applicable, will report to the Board of Directors if she or he receives any reported Violation under this Policy no later than the time of the next regularly-scheduled Board Meeting of Washington Council of Lawyers. The Executive Director or the President of the Board of Directors, as applicable, will be responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation. The Executive Director or President of the Board of Directors will report to the Board of Directors the results of any such investigation and any corrective action that has been or will be taken. In addition, the Executive Director or President of the Board of Directors shall immediately notify the Budget & Finance

Committee of any reported Violations relating to corporate accounting practices, internal controls and auditing.

Any individual who is the subject of a reported Violation will not be involved in conducting the investigation of such reported Violation.

No Retaliation

No one who has made a good faith report of a Violation or who has, in good faith, cooperated in the investigation of a Violation shall suffer harassment, retaliation or adverse employment consequences (taken together, "Retaliation"). Any individual within Washington Council of Lawyers who Retaliates against an individual who has made a good faith report of a Violation or who has, in good faith, cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

Anyone who believes that an individual who has made a good faith report of a Violation or who has, in good faith, cooperated in the investigation of a Violation is suffering harassment, retaliation or adverse employment consequences, should contact the Executive Director, the President of the Board of Directors, or any officer of Washington Council of Lawyers.

Employees with questions regarding this Policy should contact the Executive Director or the President of the Board of Directors.