

THE FLORIDA BAR FOUNDATION

Whistleblower Policy

I. Introductory Statement

The Florida Bar Foundation (“Foundation”) requires directors, officers and employees (each, a “Person”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All Persons should loyally and faithfully serve the Foundation’s mission, comply with applicable laws, regulations, the Foundation’s Conflict of Interest Policy and other stated policies of the Foundation. All Persons should deal fairly and honestly with each other, as well as volunteers, donors, grantees, vendors to the Foundation, and others with whom we interact. These are fundamental principles of the Foundation and any failure or refusal to observe them is a Violation.

II. Reporting Responsibility

It is the responsibility of all directors, non-executive officers and employees to report suspected Violations of this Whistleblower Policy in accordance with the procedures set forth herein.

III. No Retaliation

No director, non-executive officer or employee who in good faith reports a Violation or refuses to participate in any activity that would result in 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.

If an employee believes someone has violated the Foundation's no retaliation policy, the employee should bring the matter to the immediate attention of the executive director or the chair of the Foundation's Finance & Audit Committee. Any employee, regardless of position or title, whom the Foundation determines has engaged in conduct that violates the Foundation's no retaliation policy will be subject to discipline, up to and including termination.

IV. Compliance with Conflict of Interest Policy

All Foundation employees are expected to comply with the Foundation's Employee Conflict of Interest Policy. If an employee is not sure if he or she has an actual or potential conflict of interest in a Foundation work activity, the employee should discuss the matter with his or her supervisor. If a question still exists, the employee and supervisor should discuss the matter with their department head or the executive director.

V. Reporting Violations

If an employee has reasonable cause to suspect a Violation, the employee is required to report this as follows:

1. to his or her supervisor, department head, or the executive director; or
2. to the chair of the Foundation's Audit committee.

VI. Reporting Duties of Supervisors, Department Heads, and Executive Director

If a suspected Violation is reported to a supervisor, the supervisor must immediately report the matter to his or her department head, unless the department head is suspected to be involved. In that case, the supervisor must report the matter to another department head or to the executive director.

If a suspected Violation is reported to a department head, the department head must immediately report the matter to the executive director, unless the executive director is suspected to be involved. In that case, the department head must report the matter to the chair of the Foundation's Finance & Audit Committee.

If a suspected Violation is reported to the executive director, the executive director must immediately report the matter to the Chair of the Foundation's Finance & Audit Committee.

VII. Acting in Good Faith

Any Person reporting a suspected Violation must be acting in good faith and have reasonable grounds for believing the information disclosed in the report indicates a Violation. Any report that proves not to be substantiated and to have been made maliciously or knowingly to be false will be viewed as a serious offense subject to discipline up to and including termination of employment.

VIII. Confidentiality

Reports of suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.

IX. Handling of Reported Violations

The individual receiving a report of a suspected Violation will notify the individual making the report within ten business days. All reports will be promptly investigated and appropriate action taken if warranted by the investigation.

Adopted by the Board of Directors on June 27, 2013

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