

Ventura County Bar Association

EMPLOYEE WHISTLEBLOWER POLICY

The Ventura County Bar Association (VCBA) and the Volunteer Lawyers Services Program (VCBA/VLSP, Inc) requires its Directors, officers and employees to observe the highest standards of business and personal ethics in the conduct of their VCBA duties and responsibilities. See VCBA's Conflict of Interest and Ethics Policy. VCBA trustees, directors, officers and employees are expected to be vigilant in carrying out their responsibilities with honesty and integrity, as well as in compliance with all applicable laws and regulations. This Whistleblower Policy supplements and complements VCBA's Conflict of Interest and Ethics Policy. Nothing here should be read to permit or excuse any violation of that policy.

I. Reporting Responsibility

The Whistleblower Policy is designed to encourage and enable employees to raise serious concerns about the actions of VCBA staff, within the VCBA itself, prior to seeking resolution outside of the organization. The policy affords all employees of the VCBA the opportunity to report, confidentially, and without fear of retaliation, known or suspected financial improprieties or misuse of program resources, or activity s/he believes to be dishonest, dangerous, fraudulent or illegal.

II. Confidentiality

Problems or suspected problems as described in Section 1 above may be reported on a confidential basis or may be submitted anonymously. Anonymous reports will be investigated; however, the reporting individual is encouraged to identify him/herself in order to conduct a thorough investigation. Reporting individuals will be expected to cooperate in any internal investigation concerning the report. Reports will be kept confidential to the extent possible, consistent with the requirements of law and with the obligations of the Executive Director and President of the Board of Directors to conduct an adequate investigation.

III. No Retaliation

It is the policy of the VCBA that no adverse actions shall be taken against any person in retaliation for reasonable and good faith reporting under this policy. There will be no penalty for reasonable and good faith reporting including firing, demotion, suspension, harassment, failure to promote or any other kind of discrimination. Even if the reported claims are subsequently determined to be unfounded, the VCBA will not reprimand or otherwise retaliate against the employee making such reports as long as the employee has acted reasonably and in good faith.

IV. Reporting Procedure

Employee reports of problems or suspected problems as described in Section 1 above should be made to the Executive Director and Board President. Reports involving the Executive Director's conduct may be made to the President of the Board of Directors. The report should be in writing and should set forth in detail the basis for the problem or

suspected problem. Written reports should be mailed to the attention of the VCBA Executive Director and the VCBA Board President at 4475 Market Street, Suite B, Ventura, CA 93003.

V. Investigation Procedure

The Executive Director or Board President will notify the sender and acknowledge receipt of the report within ten business days, provided the address of the reporter is known. All reports will be promptly investigated by either the Executive Director or the Board President, as appropriate. The Executive Director or the Board President shall have discretion to refer the investigation to the Finance Committee or another appropriate Board Committee, depending on the nature of the allegation(s).

VI. Report of Results

The Executive Director or the Board President will report back to the Board, regarding the results of the investigation. Depending on the nature of the situation reported or the allegation made the report shall be either in the Executive or Regular Session of the Board Meeting.

VII. Acting Reasonably and in Good Faith

Persons reporting problems or suspected problems as described in Section 1 above must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the law. The act of making allegations that prove to be unsubstantiated and to have been made maliciously, recklessly or with the knowledge that the allegations are false, will be viewed as a serious disciplinary offense, which may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

President
Ventura County Bar Association
April 13, 2012