

Center for Human Rights and Constitutional Law
256 S. Occidental Blvd.
Los Angeles, CA 90057

Policy Concerning Whistleblower Protection
(April 2012)

The Center for Human Rights and Constitutional Law Foundation (“CHRCL”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the CHRCL, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that CHRCL can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of ethics or suspected violations of law or regulations that govern CHRCL’s operations.

No Retaliation

It is contrary to the values of CHRCL for anyone to retaliate against any board member, officer, employee or volunteer 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 CHRCL. 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

CHRCL 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, you are encouraged to speak with the Executive Director, General Counsel, or Board Members. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to CHRCL’s Executive Director and

Chairperson of the Board (“Compliance Officers”), who will have responsibility to investigate all reported complaints.

Compliance Officers

CHRCL’s Compliance Officers are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officers will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Board of Directors on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

CHRCL’s Compliance Officers shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written 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

CHRCL’s Compliance Officers will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be

taken if warranted by the investigation.

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