



## **WHISTLEBLOWER POLICY**

I. General. This policy is in effect for all directors, officers, and employees of the National Council of Juvenile and Family Court Judges and its related entities, which are designated as the National Council of Juvenile and Family Court Judges Fund, Inc. and the National Juvenile Court Foundation. The National Council of Juvenile and Family Court Judges' Standards of Conduct, Conflicts of Interest Policy, and Administrative Manual requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and comply with all applicable laws and regulations.

II. Definitions. A whistleblower as defined under this policy is an employee or Board member of the NCJFCJ who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this policy.

Illegal or dishonest activities covered by this Whistleblower Policy may include, but are not limited to: a violation of applicable local, state or federal laws; billing for services not performed or for goods not delivered; fraudulent financial reporting; improper internal accounting controls or auditing matters; or the use of NCJFCJ property, resources, or authority for personal gain or other non organization-related purpose.

III. Reporting Responsibility. It is the responsibility of all directors, officers and employees to comply with the NCJFCJ Standards of Conduct, Administrative Manual, and related policies and to report violations or suspected violations in accordance with this Whistleblower Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate officials are charged with these responsibilities.

IV. Reporting. If an employee or Board member has knowledge of or a concern of illegal or dishonest fraudulent activity, the individual should submit such concerns in writing to the Board Treasurer and to General Counsel (Human Resources), on a confidential, anonymous basis if so desired. The Board Treasurer and General Counsel (Human Resources) shall promptly notify the President and the Audit Committee Chair of complaints received.

V. Investigation. The Audit Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. Other complaints may be delegated to an appropriate authority for investigation by the President and General Counsel (Human Resources).

Each matter will be investigated by the appropriate authority and the results of the investigation reported to the President and Audit Committee Chair. The President and Chief Executive Officer will take corrective and disciplinary actions, as appropriate, up to and including termination of employment or dismissal from the Board of Directors or membership in NCJFCJ.



Employees of the NCJFCJ or outside legal, accounting or other advisors as appropriate, may be enlisted to conduct investigation of complaints. In conducting any investigation, reasonable efforts shall be made to protect the confidentiality and anonymity of the complainant.

VI. No Retaliation and Confidentiality. Whistleblower protections are provided in two important areas – confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

The NCJFCJ will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the NCJFCJ President or the chair of the Audit Committee immediately. An employee or Board member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the Board of Directors. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

VII. False Reporting. An employee or member of the Board of Directors who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination of employment or dismissal from the Board of Directors or membership in NCJFCJ. 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 or fraudulent activity. 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.

VIII. Records. The Audit Committee shall retain as a part of its records any such complaints or concerns for a period of no less than seven (7) years.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within NCJFCJ prior to seeking resolution outside the NCJFCJ. Employees with questions regarding this policy should contact the Human Resources Director.

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Approved by: Joey Orduna Hastings  
Chief Executive Officer