

Avenues for Justice Whistleblower Policy

AFJ requires directors, officers, and staff members to observe high standards of ethics in the conduct of their duties and responsibilities. All parties must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. In that regard, AFJ has adopted this Whistleblower Policy to address the submission by directors, officers and staff members of complaints, concerns and suspected violations with respect to any matter of public concern, including but not limited to the following:

- Questionable accounting, internal accounting controls and auditing matters.
- Compliance with legal and regulatory requirements.
- Theft of any kind.
- A retaliatory act against an employee who reports a suspected violation of any of the above.
- Any other conduct that is illegal or unethical and is a matter of public concern.

Procedure for Reporting Violations

Directors, officers, and staff members have a duty to share their complaints and concerns, and suspected violations regarding the ethical and legal standards noted above should be addressed directly to the Compliance Officer.

Compliance Officer

AFJ's Compliance Officer is responsible for investigating and resolving all reported complaints, concerns and suspected violations and, at her/his discretion, shall advise the executive director and if required as described below under "Legal and Accounting Matters", shall advise the Finance/Audit Committee. The Compliance Officer is required to report to the Finance/Audit Committee annually on compliance activity. AFJ's Compliance Officer is the Board Chair. If a trustee, officer, or staff member thinks it is inappropriate to report a complaint, concern or suspected violation to the Compliance Officer, the complainant should report such matters to the Finance/Audit Committee.

No Retaliation

No director, officer, or staff member who in good faith reports a complaint, concern or suspected violation in accordance with this Whistleblower Policy shall suffer harassment or retaliation. A director, officer, or staff member who retaliates against someone who has reported a violation is subject to discipline up to and including removal from the board or termination of employment.

Legal and Accounting Matters

The Compliance Officer shall immediately report to the Finance/Audit Committee, and the Finance/Audit Committee shall address, all reported complaints, concerns or suspected violations regarding accounting matters, matters of internal accounting controls, auditing matters, legal or regulatory matters, or matters of any kind that may give rise to heightened

litigation risk. The Compliance Officer shall work with the Finance/Audit Committee toward resolution of the issue.

Confidentiality

Complaints, concerns and suspected violations may be submitted to the Compliance Officer on a confidential basis by the complainant or may be submitted anonymously. Reports of complaints, concerns or suspected violations will be kept confidential to the extent possible, consistent with the overriding need to conduct a thorough investigation.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the complaint, concern or suspected violation within seven days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by an investigation.

Records

The Compliance Officer shall retain for a period of at least seven years all records relating to any complaint, concern or suspected violation reported to her/him in accordance with this Whistleblower Policy.