

Lawyers Alliance for New York Whistleblower Policy

Lawyers Alliance for New York ("Lawyers Alliance") requires its directors, officers employees, and on-site volunteers ("Protected Persons") to observe high standards of business and personal ethics, as such personal ethics relate to the organization, in the conduct of their duties and responsibilities. As employees and representatives of Lawyers Alliance, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

The objectives of this Whistleblower Policy are to encourage and enable Protected Persons, without fear of retaliation, to raise concerns regarding suspected conduct or practices that are illegal or in violation of corporate policy on a confidential and, if desired, anonymous basis so that the Corporation can address and correct inappropriate conduct and actions

This policy is not a vehicle for reporting violations of Lawyers Alliance's applicable human resources policies, problems with co-workers or managers, or for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be dealt with in accordance with Lawyers Alliance's Personnel Policies and Procedures, adopted April 28, 2014 (the "Policies and Procedures") as it is those Policies and Procedures that are applicable to such matters.

Reporting Responsibility

It is the responsibility of all Protected Persons to report in good faith actual or suspected activities which may be illegal or in violation of the Corporation's policies with respect to, without limitation, fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, and misuse of the Corporation's assets. ("Violations") in accordance with this Whistleblower Policy.

No Retaliation

No Protected Person who in good faith reports a Violation shall suffer harassment, retaliation or adverse employment consequence because of such report. 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Lawyers Alliance prior to seeking resolution outside the organization. Notwithstanding anything contained herein to the contrary, this Whistleblower Policy is not an employment contract and does not modify the employment relationship between Lawyers Alliance and its employees, nor does it change the fact that employees of Lawyers Alliance are employees at will. Nothing contained herein is intended to provide any Protected Person with any additional rights or causes of action, other than those provided by law.

Reporting Violations

Any Violations should be reported as soon as is practicable to the Chair of Lawyers Alliance's Audit Committee (the "Compliance Officer")

Compliance Officer

The Compliance Officer is responsible for investigating and resolving all reported Violations and shall advise the Audit Committee and, if the Compliance Officer deems it appropriate, the Executive Director, of all reported complaints and allegations of Violations. The Compliance Officer is required to report to the full Board of Directors at each regularly scheduled board meeting on compliance activity.

Accounting and Auditing Matters

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the committee until the matter is resolved. Promptly upon receipt, the Audit Committee shall evaluate whether a complaint constitutes an accounting complaint and if so shall promptly determine what professional assistance, if any, it needs in order to conduct an investigation. The Audit Committee will be free in its sole discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.

Investigations

The Compliance Officer may delegate the responsibility to investigate a reported Violation, whether relating to accounting and auditing matters or otherwise, to one or more employees of Lawyers Alliance or to any other individual, including persons not employed by Lawyers Alliance, selected by the Compliance Officer; provided, that the Compliance Officer may not delegate such responsibility to an employee or other individual who is the subject of the reported Violation or in a manner that would compromise either the identity of an employee who reported the Violation anonymously or the confidentiality of the complaint or resulting investigation. Notwithstanding anything herein to the contrary, the scope, manner and parameters of any investigation of a reported Violation shall be determined by the Audit Committee in its sole discretion and Lawyers Alliance and its employees will cooperate as necessary in connection with any such investigation.

Acting in Good Faith

Anyone filing a complaint concerning a Violation must act in good faith and have reasonable grounds for believing the information disclosed may indicate a violation of such standards. Any allegations that prove not to be substantiated and which prove to have been made other than in good faith will be viewed as a serious disciplinary offense.

Confidentiality

In making a complaint or submission, an employee of Lawyers Alliance may request that such complainant be treated in a confidential manner (including that Lawyers Alliance take reasonable steps to ensure that the identity of the employee making the complaint remains anonymous). Lawyers Alliance takes seriously its responsibility to enforce this Whistleblower Policy and therefore encourages any employee reporting a Violation to identify him or herself so as to facilitate any resulting investigation. Employees may, however, submit complaints on an anonymous basis. Reports of Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days, but only to the extent the sender's identity is disclosed or a return address is provided. All reports will be promptly investigated, the scope of any such investigation being within the sole discretion of the Audit Committee, and appropriate corrective action will be taken if warranted by the investigation.

Records

The Audit Committee will retain on a strictly confidential basis for a period of seven years (or otherwise as required under Lawyers Alliance's record retention policies in effect from time to time) all records relating to any complaint and to the investigation and resolution thereof. All such records are confidential to Lawyers Alliance and such records will be considered privileged and confidential.

Distribution

Lawyers Alliance shall distribute a copy of this Whistleblower Policy to all Protected Persons.

Compliance Officer:

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Adopted by the Board of Directors at its Meeting on April 28, 2014