

WHISTLEBLOWER POLICY

NO RETALIATION

No director, officer or employee who in good faith reports a violation or suspected violation of law or any NABL policy shall suffer harassment, retaliation or adverse employment consequence. The whistleblower is protected from retaliation based on reporting activity in accordance with this Policy, including any adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. This Policy is intended to encourage and enable employees and others to raise serious concerns within the National Association of Bond Lawyers (“NABL”).

No director, officer or employee shall suffer retaliation for refusing to participate in an activity that would result in a violation of a State or federal law, rule or regulation or any NABL policy.

WHO TO CONTACT

An employee with knowledge or a concern relative to illegal or dishonest fraudulent activity or violation of this Policy is to communicate these concerns by contacting the Chief Operating Officer or President of the Board.

INVESTIGATION

The President and Chief Operating Officer (unless implicated in the disclosure) are responsible for investigating all reported complaints and allegations concerning violations of law or policy. The President and Chief Operating Officer or their designee shall immediately notify the Treasurer of any complaint received related to the accounting practices, internal controls, finances or auditing of NABL, and work with the Finance Committee for timely resolution of such issues. The Treasurer shall report to the Board at least annually on compliance activity.

GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation of law or policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law or policy. 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.

RESPONSIBILITY FOR PERSONAL WRONGDOING

The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated, or immunity from discipline or termination based on job performance or other factors, except for reporting activity or refusing to participate in wrongdoing in accordance with this Policy.

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.

Nothing in this Policy, or any other rule, regulation or policy, shall prevent any one from disclosing information to any government or law enforcement agency if one has reasonable cause to believe that the information discloses a violation of a State or federal law, rule or regulation.

Adopted: 2006

Updated: November 15, 2013