

## **Whistleblower Policy**

The Houston Coalition for Life (HCL) Code of Ethics requires board members, employees and independent contractors (collectively referred to as “HCL Representatives”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All HCL Representatives shall practice honesty and integrity in fulfilling their responsibilities and comply with applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all HCL Representatives to comply with the HCL Code of Ethics and to report violations or suspected violations in accordance with this Whistleblower Policy.

Employees and independent contractors are expected to consult promptly with their supervisor regarding any action, occurrence, conduct or attitude, either expressed or implied, that they believe to be illegal, unethical, discriminatory, abusive or threatening.

HCL Representatives are encouraged to promptly submit concerns or issues regarding HCL’s accounting, internal controls and auditing matters, as well as any suspected fraud.

### **No Retaliation**

No HCL Representative who, in good faith, reports a violation of the HCL Code of Ethics shall suffer harassment, retaliation, or adverse employment consequence. An HCL Representative 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 any HCL Representative to raise serious concerns within the organization prior to seeking resolution outside the organization.

### **Reporting Violations**

The HCL Code of Ethics addresses the organization’s open-door policy and suggest that employees share their questions, concerns, or complaints with someone who can address them properly. In most cases, a person’s supervisor is in the best position to address an area of concern. However, if any HCL Representative is not comfortable speaking with their supervisor,

or they are not satisfied with their supervisor's response, they are encouraged to submit the complaint in writing to the President of the board of directors for consideration by the full board.

### Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the HCL Code of Ethics must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Ethics. Any allegations 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 maximum extent possible, consistent with the need to conduct an adequate investigation.

### Handling of Reported Violations

If contact with the board President is made, a decision will be rendered as promptly as possible, but in all instances a determination by the full board will be made within 30 days from the date of the written complaint. This same period of time should be used to determine if a supervisor has responded to an ethics complaint within a reasonable period of time.