



**The Chicago Bar Foundation
Ethics and Whistleblower Policy**
(Adopted May, 2007)

Mission

The Chicago Bar Foundation is dedicated to bringing our legal community together to ensure that everyone in the Chicago metropolitan area has equal access to justice, particularly the low-income and disadvantaged people who are in most critical need of the protections of our civil legal system. Through grants, advocacy and other leadership, the CBF takes a system-wide approach to improving access to justice and focuses on those objectives that are best achieved by working together as a community.

Code of Ethics

As an integral part of carrying out its mission, the CBF has adopted a code of ethics to guide its board members, other volunteers, staff and contractors in their conduct when acting on behalf of the CBF. The Code contains broad principles reflecting the types of behavior the CBF expects towards constituents, employees, peers and the public. The Code is intended to provide a framework for ethical decision-making, as no Code can provide specific guidance for all situations. This policy is not intended as a stand-alone policy. It does not embody the totality of the CBF's ethical standards, nor does it answer every ethical question or issue that might arise. Rather, it is one element of a broader effort to create and maintain a high quality organization that makes ethical conduct the highest priority. The CBF Board will periodically review this Code and update it as necessary.

Board members, other volunteers, staff and contractors of the CBF will:

1. Exercise care, good faith and due diligence in organizational affairs.
2. Strive for excellence and transparency in all of our work, manage our resources effectively, and demonstrate professional respect and responsiveness to constituents and others.
3. Contribute to an organizational culture that respects the diverse, individual contributions of staff and leadership.
4. Respect the confidentiality of sensitive information about the CBF, its donors, grantees, board members, employees, contractors and volunteers.
5. Comply with applicable federal, state and local laws, regulations and fiduciary responsibilities.
6. For the board of directors, provide credible and effective oversight to the organization's work.
7. Abide by the governing documents and policies of the CBF, including the CBF Conflict of Interest Policy.

8. Be accountable for adhering to this Code of Ethics and Whistleblower Policy.
9. Act at all times in accordance with the highest ethical standards and in the best interest of the CBF, its constituents and reputation.

Compliance, Monitoring and Reporting

The CBF management is responsible for communicating this Code of Ethics to all employees, contractors, board members and other volunteers and for ensuring its contents are understood and followed. Alleged breaches of this Code, with the exception of alleged violations of the CBF Employee Handbook, should be reported in accordance with the following Reporting of Unethical or Illegal Conduct Policy.

Reporting of Unethical or Illegal Conduct Policy (“Whistleblower Policy”)

Purpose

The purpose of this policy is to provide all employees, contractors, board members and other volunteers with guidelines for the reporting of unethical or illegal behavior by CBF staff, board members, contractors or volunteers. This policy does not apply to behavior covered by the CBF Employee Handbook; alleged violations of the CBF Employee Handbook should be reported in accordance with the Employee Handbook’s Whistleblower Policy.

Policy

The CBF is committed to lawful and ethical behavior in all of its activities and requires its employees, contractors, board members and other volunteers to conduct themselves in a manner that complies with all applicable laws and regulations and the highest ethical standards. At any time an employee, contractor, board member or other volunteer has a concern regarding the propriety or legality of any action contemplated to be taken or that has been taken by the CBF or any other employee, contractor, board member or volunteer, or believes that an action needs to be taken for the CBF to be in compliance with law or appropriate ethical standards, that person should immediately contact the Executive Director or the President, 1st Vice President, 2nd Vice President, Secretary or Treasurer of The Chicago Bar Foundation.

Handling of Reported Violations

The Executive Committee shall address all reports of alleged illegal or unethical conduct. The Executive Director or any other CBF Officer who receives a report alleging illegal or unethical conduct by a CBF employee or representative shall notify the Executive Committee of the CBF Board whenever such a report is received.

All reports will be promptly investigated by the Executive Committee, but any member of the Executive Committee who is the subject of such a report shall not participate in any way in the investigation except to answer questions or requests for information from the Executive Committee. Every effort will be made to investigate a report of alleged misconduct as quickly and discretely as possible. Because of the

need to investigate the report, correct a problem or prevent future problems, The Chicago Bar Foundation cannot promise complete confidentiality. The Executive Committee has the authority to retain outside legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

If warranted by the investigation, the Executive Committee shall recommend appropriate corrective action to the Board of Directors. The Executive Committee shall reply to the complainant as appropriate. No employee, board member, contractor or other volunteer will be retaliated against, discriminated against, threatened or discharged or otherwise disciplined for reporting in good faith what he/she believes to be unethical or illegal conduct.