

ASSOCIATION OF THE BAR OF THE CITY OF NEW YORK FUND, INC.

WHISTLEBLOWER POLICY

January 17, 2017

It is the responsibility of all officers, directors, employees and volunteers of the City Bar Fund to report in good faith any conduct by a City Bar Fund employee, contractor, officer, director or volunteer that the employee believes is or may be illegal, fraudulent or in violation of any adopted policy of the City Bar Fund (collectively, "Concerns").

Reporting Responsibility

All Concerns should be reported as soon as practicable. Any individual who seeks to report a Concern should bring it to the attention of his/her supervisor (if a City Bar Fund employee), the City Bar Fund Counsel ("Counsel"), or the Vice President who serves as Executive Director of the New York City Bar Association ("Vice President"). If the conduct in question involves his/her supervisor (if a City Bar Fund employee), the Vice President or the Counsel, the individual should bring his/her Concern to the attention of the President or the Chair of the Board of Directors. Individuals may also report any Concerns directly to the Chair of the Audit Committee. All persons who receive a report of a Concern pursuant to this Policy shall promptly inform the Audit Committee of such report. Concerns reported under this policy may be in writing (including by email) or by phone, and the reporting may be anonymous.

Employees must exercise sound judgment and have a reasonable basis for believing that the information disclosed indicates conduct that is or may be illegal, fraudulent or in violation of any adopted policy of the City Bar Fund. An employee who intentionally files a false report may be subject to discipline, up to and including discharge.

Investigations

The City Bar Fund shall promptly investigate all reported Concerns and will take appropriate corrective action, if warranted. This investigation shall be coordinated by the Counsel. However, if the investigation relates to the Counsel's conduct, the investigation shall be coordinated by the most senior officer of the City Bar Fund whose conduct is not the subject of the individual's report, or a person designated by such officer. The results of the investigation shall be reported to the Audit Committee.

An employee who is also a member of the Board of Directors may not take part in any Board or Audit Committee deliberations concerning the administration of this Whistleblower Policy. In addition, any individual who is the subject of a whistleblower complaint may not be present at or participate in any Board or Audit Committee deliberations or voting on the matter relating to the complaint. Nothing in this policy shall prohibit the Board of Directors or Audit Committee from requesting that the individual who is the subject of the complaint present background information or answer questions prior to the commencement of deliberations or voting.

No Retaliation

The City Bar Fund will not take any retaliatory action against any individual who in good faith reports a Concern, provides information or participates in an internal or government investigation of any such Concern. Acts of retaliation should be reported immediately to the Human Resources Director, the Counsel or the Vice President. Any employee who retaliates against an individual who has reported a Concern in good faith may be subject to discipline, up to and including discharge.

The right to be free of retaliation does not preclude the City Bar Fund from taking action against the employee relating to the employee's job performance or other conduct, and does not preclude other action regarding officers, directors or volunteers that are otherwise consistent with law and with the Fund's bylaws and policies.

Confidentiality

Insofar as is possible, the City Bar Fund will maintain the confidentiality of any employee reporting a Concern, although the employee's identity may have to be disclosed to conduct the appropriate investigation, to comply with the law or legal process, or to provide a person accused with the opportunity to defend him/herself against the accusation.

Distribution

This policy shall be distributed to all officers, directors and employees of the City Bar Fund, and to volunteers who provide substantial services to the City Bar Fund. This Policy shall be posted on the City Bar Fund's website.

Questions

Anyone who has questions regarding this policy should contact the Vice President, who shall be the administrator of the policy.