



## **Whistleblower Policy**

### **General**

The Houston Coalition for Life (HCL) Code of Ethics Policy and Ethics Complaint Policy (“Ethics Policies”) require board members, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers, and employees to comply with the HCL Ethics Policies and to report violations or suspected violations in accordance with this Whistleblower Policy.

### **No Retaliation**

No director, officer, or employee who in good faith reports a violation of the HCL Ethics Policies shall suffer harassment, retaliation, or adverse employment consequence. 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 the organization prior to seeking resolution outside the organization.

### **Reporting Violations**

The HCL Ethics Policies address the organization’s open-door policy and suggest that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to submit your complaint in writing to the President of the board of directors – Mr. Brock Akers at [bca@akers.com](mailto:bca@akers.com) – for consideration by the full board.

### Acting in Good Faith

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