



LA CONSERVATION CORPS

EMPLOYEE PROTECTION (WHISTLEBLOWER) POLICY

The LA Conservation Corps' Code of Ethics and Conduct ("Code of Ethics") requires directors, officers, employees and corpsmembers to observe the highest standards of business and personal ethics in the performance of their duties and responsibilities. As employees and representatives of the LA Conservation Corps, honesty and integrity are necessary in the fulfillment of our responsibilities and compliance with all applicable laws and regulations.

It is in the best interest of the LA Conservation Corps that any and all potentially, ethically and/or legally questionable behavior or practices be uncovered immediately. This allows the LA Conservation Corps to correct these practices and take all actions necessary to protect the integrity of the organization.

This Whistleblower Policy is designed to use our existing open-door and grievance policies and procedures to ensure that questions raised by all employees and representatives will be taken seriously without regard to rank or fear of retaliation.

Reporting Responsibility

It is the responsibility of all directors, officers, employees and corpsmembers to comply with the Code of Ethics and to report violations or suspected violations immediately. If any employee or representative reasonably believes that some policy, practice or action of the LA Conservation Corps or any of its representatives is in violation of law, regulation or the Code of Ethics he or she should report the violation (as described below under "Reporting Violations").

Supervisors, senior managers and the Human Resource Department are required to report any suspected violation of law, regulation or the Code of Ethics that was reported to them to the Contract Compliance Officer, who has specific responsibility to look into the allegation.

No Retaliation

No director, officer, employee or corpsmember who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence.

Reporting Violations

Employees who suspect a violation or who have questions, complaints or suggestions should share their concerns with someone who can address them properly.

- In most cases, your supervisor is in the best position to address your concerns.
- If you are not comfortable or unsatisfied speaking with your supervisor, you are encouraged to speak with someone in the Human Resources Department or anyone in a Senior Management role.
- If you are not comfortable or unsatisfied speaking with your supervisor, someone in the Human Resources Department or a senior manager, you are encouraged to contact the Contract Compliance Officer directly.
- If you are not comfortable or unsatisfied speaking with your supervisor, someone in the Human Resources Department, a senior manager or the Contract Compliance Officer, or you wish to make an anonymous report, you are encouraged to contact the **LA Conservation Corps Ethics Hotline** which is a direct link to the Board of Directors through the Chairperson of the Board and/or the Chairperson of the Audit Committee of the Board of Directors.

The LA Conservation Corps Ethics Hotline

LA Conservation Corps has retained an independent firm called EthicsPoint—a leading provider of services to support compliance, workplace ethics and corporate governance—to enable employees, corpmembers, officers and directors to anonymously and openly communicate with LA Conservation Corps' management and Board. Individuals can report knowledge of or a concern about an unethical, illegal, dishonest or fraudulent activity anonymously and/or confidentially via a toll-free hotline or the Internet. You can contact EthicsPoint at www.ethicspoint.com or (800) 422-1457, 24 hours a day, 7 days a week. The EthicsPoint system will process the employee's information and will promptly send notice of the report to the LA Conservation Corps' Contract Compliance Officer, the Chair of the Board of Directors and the Chair of the Board's Audit Committee.

How will EthicsPoint Manage Reports?

Once a report is logged into the EthicsPoint system by phone or the Internet, the reporter is issued a unique password and report key. This key allows the reporter to confidentially follow up on their report and access questions or responses posted by LA Conservation Corps. The reporter can then respond to any additional questions so that the investigation into their report can be completed thoroughly and expeditiously.

EthicsPoint will notify the Contract Compliance Officer, Board Chair and Board's Audit Committee Chair that they have a report stored on the EthicsPoint secure server. The Contract Compliance Officer will access the EthicsPoint Secure Server to view, manage and resolve reports.

Confidentiality

Suspected violations may be submitted on a confidential or anonymous basis by any employee, corpmember, officer or director. Reports of all violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

The Contract Compliance Officer will have the ability through the whistleblower hotline reporting system to acknowledge receipt of the reported violation or suspected violation within five (5) business days through the anonymous code provided to the reporter by Ethics Point. All reports will be promptly investigated and appropriate corrective action will be taken if warranted. The whistleblower hotline reporting system will allow the Contract Compliance Officer to ask the reporter to provide additional information when needed while still maintaining the anonymity of the reporter.

The Contract Compliance Officer will review all allegations concerning violations of the Code and, at his or her discretion, shall advise the Chair of the Board and/or the Chair of the Audit Committee so that all complaints and/or allegations are expeditiously investigated and resolved.

If you wish to make an anonymous report we recommend that you use non-LA Conservation Corps equipment (phone or computer) to submit your report, in order to preserve the highest level of anonymity.

To File a Report

- Toll-Free Phone: Call (800) 422-1457 to file a report.
- Internet: From any computer with Internet access (home, public library, neighbor, etc.), go to www.ethicspoint.com and click on "File a Report." Enter "LACORPS" in the space requesting the name of the organization being reported on.

As you complete your report, you will be asked to provide information concerning who was involved, what occurred and where and when the incident(s) took place. The process is confidential and anonymous. You will be given a password and identification code by EthicsPoint for the purpose of follow-up. Write down the ID code and password as you will need them again.

Follow-up on Your Report

- Reconnect with the EthicsPoint system to see if LA Conservation Corps has any follow-up questions or requests, using either the Internet or a telephone.
- Click on or ask to perform a follow-up.
- Provide your password and identification code.
- Elect to review report details, respond to questions, and add information. You may also return regularly to do so.

Acting in Good Faith

Anyone reporting a suspected violation of law, regulation or the Code of Ethics should be acting in good faith and have reasonable grounds for believing the information to be true. Allegations which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Accounting and Auditing Matters

If the report involves corporate accounting, auditing or internal compliance controls, the Compliance Officer will immediately notify the Audit Committee of the Board of Directors and work with the Committee until the issue is resolved.

Incident Reporting via DOL's Incident Reporting System

Workforce Investment Act (WIA) regulations (Title 20 CRF Section 667.630) require that if the report involves criminal fraud, waste, abuse or other criminal activity associated with one of the Corps' WIA-funded projects or staff, that information and complaints must be reported immediately through the Department of Labor's Incident Reporting system to the Office of Inspector General with a copy simultaneously provided to the Employment and Training Administration (ETA). The Incident Reporting System also processes noncriminal complaints regarding mismanagement and gross waste of funds. Reports may be submitted to the OIG at their website (www.oig.dol.gov/hotnet1.htm), by telephone at 800-347-3756 or fax to 202-693-5210 or by mail to: Office of Inspector General, United States Department of Labor, 200 Constitution Avenue, NW, Room S-5506, Washington, DC 20210. Incident Report Forms are also available in the Contract Compliance Officer's office and should be completed and faxed or mailed to the number/address listed above.

Employee Protection

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within LA Conservation Corps prior to seeking resolution outside the organization. The LA Conservation Corps will not retaliate nor tolerate retaliation against anyone who, in good faith, reports a suspected violation of law, regulation or the Code of Ethics. This includes protests or complaints against practices of the LA Conservation Corps, or of another individual or entity with which LA Conservation Corps has a business relationship.

Any representative of the LA Conservation Corps who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, up to and including termination of employment.

What Does This Mean to Me?

In order for LA Conservation Corps to succeed in its work, we must all work together to ensure that no harm comes to the organization as a result of poor choices. Our reputation in the community is based on a history of trustworthiness.

In summary: (1) If you witness misconduct and choose to ignore it, the LA Conservation Corps may be weakened and may even be unable to do its work and (2) If you witness misconduct and report your concerns in good faith, there will be a fair and full investigation and you are assured there will be no work-related retaliation.

Your signature below indicates you have read and understand LA Conservation Corps' Employee Protection (Whistleblower) Policy, and have been given a chance to ask questions about it.

Please return the signed signature page to the Human Resources Department and retain the copy of the policy for your records/future reference.

Employee Signature

Date

Print Name _____