

**The Maritime Law Association  
of the United States  
Whistleblower Policy**

**Introduction**

The Maritime Law Association ("MLA") Code of Ethics and Conduct requires directors, officers and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members and representatives of the MLA, 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 members to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

**Retaliation**

No director, officer or member who in good faith reports an ethical or legal violation shall suffer harassment or retaliation. A director, officer or member who retaliates against someone who has reported a violation in good faith is subject to discipline which may include termination as a director, officer or member. This Whistleblower Policy is intended to encourage and enable members to raise serious concerns within the MLA prior to seeking resolution outside the MLA.

**Reporting Violations**

The MLA maintains an open door policy and provides a facility for the members to share their questions, concerns, suggestions or complaints with someone who can address them properly. MLA members are encouraged to report any questions or concerns to a director or officer of the MLA. Officers and directors are required to report suspected violations to the MLA's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. All questions, concerns, suggestions and/or complaints shall be made in writing to the MLA's Compliance Officer.

## **Compliance Officer**

The MLA's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations. The Compliance Officer shall be the MLA President. The First Vice President shall serve as the Compliance Officer with respect to the investigation and resolution of all reported complaints and allegations concerning violations by the MLA President.

## **Accounting and Auditing Matters**

The four directors of the board of directors serving the third year of their three year term shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the four directors of any such complaint in writing and work with the committee until the matter is resolved.

## **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and may serve as grounds for expulsion from membership upon a vote of the board of directors.

## **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **Handling of Reported Violations**

The Compliance Officer will acknowledge receipt in writing of the report of a violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

March, 2011