

NEW YORK LAWYERS FOR THE PUBLIC INTEREST, INC.

WHISTLEBLOWER PROTECTION POLICY

I. PURPOSE.

This Whistleblower Protection Policy will serve to safeguard high standards of organizational and personal ethics in New York Lawyers for the Public Interest, Inc. (the “Corporation”). It will encourage all directors, officers, employees and volunteers to practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations. Toward that end, this policy addresses the submission by directors, officers, employees and volunteers of complaints, concerns, and allegations of violations or suspected violations of laws or corporate policies, such as (a) questionable financial practices, including, but not limited to, the misuse of the Corporation’s assets, the circumvention or attempted circumvention of accounting procedures or internal controls, or conduct that would otherwise constitute a violation of the Corporation’s financial policies; or (b) a retaliatory act against an individual who makes a Report (as defined below in Section II) pursuant to this Policy.

II. RESPONSIBILITY OF THE LEGAL DIRECTOR, THE EXECUTIVE DIRECTOR AND THE AUDIT COMMITTEE OF THE BOARD OF DIRECTORS WITH RESPECT TO REPORTS.

It is the responsibility of the Legal Director and the Executive Director of the Corporation to administer this Policy and to report to the Audit Committee of the Board of Directors of the Corporation (the “Audit Committee”). The Audit Committee is responsible for overseeing adoption, implementation and compliance with this Policy.

In that regard, complaints, concerns and allegations of violations or suspected violations of laws or corporate policies (“Reports”) should be reported to the Legal Director or the Executive Director of the Corporation, or if a Report involves the Legal Director or the Executive Director of the Corporation, to the Chair of the Audit Committee. The Legal Director, the Executive Director and the Chair of the Audit Committee are each a “Designated Officer” for purposes of this Policy.

III. PROCEDURES FOR INVESTIGATING AND RESOLVING REPORTS.

The Designated Officer who receives the Report will (a) notify the individual making the Report– if his/her identity is known – and acknowledge receipt of the Report within seven days; and (b) notify the Audit Committee of the Report, as appropriate. The Designated Officer may also notify the other Designated Officers of the Report, as appropriate and to the extent the Report does not involve the other Designated Officers.

The Designated Officer will review the Report promptly and determine, based on factors that are appropriate under the circumstances (including without limitation the seriousness and credibility of the allegations in the Report) whether the Report should be investigated by either

the Designated Officer or by the Audit Committee. If a determination is made that the Report should be investigated, the Designated Officer or the Audit Committee, as the case may be, will promptly determine what professional assistance, if any, they will need in order to conduct the investigation. The Designated Officer or the Audit Committee, as the case may be, will be free in their discretion to engage outside auditors, counsel or other experts to assist in the investigation. Appropriate resolution of the Report may be taken by the Designated Officer or by the Audit Committee, if warranted by the investigation. The individual making the Report will be notified in writing by the Designated Officer to whom the Report was made of the resolution of the Report.

The individual who is the subject of a Report may not be present at or participate in any deliberations or voting of the Audit Committee regarding the Report except, upon the request of the Audit Committee, to present background information or answer questions in advance of any deliberations or voting of the Audit Committee. In addition, any director who is an employee of the Corporation may not participate in any deliberations or voting of the Audit Committee relating to a Report.

IV. PROTECTION OF WHISTLEBLOWERS.

Non-Retaliation.

No director, officer, employee or volunteer who in good faith makes a Report of any action or suspected action taken by or within the Corporation that is illegal, fraudulent or in violation of any adopted policy of the Corporation or that provides assistance to the Designated Officer or the Audit Committee or any other individual, entity or group, including any governmental, regulatory or law enforcement body, investigating a Report will suffer intimidation, harassment, discrimination or other retaliation or, in the case of an employee, adverse employment consequences.

An officer, director or employee who retaliates against someone who has made a Report is subject to discipline up to and including removal from the office or from the Board of Directors or termination of employment.

Confidentiality.

Reports submitted anonymously will be investigated to the extent possible. However, anonymity could become an obstacle to full investigation and resolution of a Report and therefore an individual may be asked to provide certain additional identifying details in order for the Designated Officer or the Audit Committee to conduct a thorough investigation of the Report.

The Corporation, including its directors and officers, will not, unless compelled by judicial or other legal process, reveal to any other individual, entity or group, including any governmental, regulatory or law enforcement body, the identity of any individual who makes a Report or provides assistance to the Designated Officer or the Audit Committee in investigating a Report and who, in each case, asks that his/her identity as the individual who made such Report or provided assistance in connection with such Report remain confidential.

V. RECORDS.

The Corporation will retain for a period of seven years all records relating to any Report and investigation.

VI. DISTRIBUTION

A copy of this Policy will be distributed to all directors, officers, employees and volunteers who provide substantial services to the Corporation. The Corporation may satisfy this distribution requirement by posting a copy of this Policy on its website or at its offices in a conspicuous location accessible to employees and volunteers.