

Energy & Mineral Law Foundation

WHISTLEBLOWER POLICY

This Whistleblower Policy of the Energy & Mineral Law Foundation (the “EMLF”): (1) encourages staff, members, and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of the EMLF; (2) specifies that the EMLF will protect the person from retaliation; and (3) identifies where such information can be reported.

1. **Encouragement of reporting.** The EMLF encourage complaints, reports or inquiries about illegal practices or serious violations of the EMLF’s policies, including illegal or improper conduct by the EMLF itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies.

2. **Protection from retaliation.** The EMLF prohibits retaliation by or on behalf of the EMLF against staff, members, or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The EMLF reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

3. **Where to report.** Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to the EMLF’s chief employed executive or President. If both of those persons are implicated in the complaint, report or inquiry, it should be directed to the Vice President/President-elect or to a member of the Audit Committee. The EMLF will conduct a prompt, discreet, and objective review or investigation. Staff, members, or volunteers must recognize that the EMLF may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

This policy was approved at the Annual Meeting of the Board of Trustees of the Energy & Mineral Law Foundation on May 15, 2011 in Farmington, Pennsylvania.