

<h1>BROOKINGS</h1>		<i>Policy Title:</i> [Employer and Employee Protection Policy]	
		<i>Policy No.</i>	
<i>Responsible Office</i>	Office of General Counsel	<i>Issue Date/ Effective Date</i>	
<i>Responsible Officer</i>	General Counsel	<i>Last Revision</i>	10/19/09

1.0 Summary

The Brookings Institution (“Brookings” or the “Institution”) is committed to lawful and ethical behavior in all of its activities. As such, the Institution requires its trustees, officers, affiliates, interns, or employees (collectively, “employees”) to observe high standards of business and personal ethics and act with honesty and integrity when conducting their duties and responsibilities on behalf of the Institution. Thus, Brookings has adopted this *Employee and Employer Protection Policy* to prevent and expose illegal or unethical conduct in connection with the Institution, its purpose, its finances, or other aspects of its operations, and to describe the methods for employees to promptly alert the Institution regarding these matters.

2.0 People Affected

This Policy applies to all Brookings employees regardless of location.

3.0 Definitions

A “whistleblower” is an employee of the Institution who reports an activity involving the Institution that he or she reasonably believes is unethical, illegal, fraudulent, or otherwise dishonest.

4.0 Purpose

The purpose of this policy is to protect the Institution and its employees from wrongdoing and to protect employees who make good faith disclosures of suspected wrongful conduct. More specifically, this policy:

- promotes high ethical standards;
- encourages an atmosphere that allows employees to meet their obligations to disclose violations of law and serious breaches of conduct covered by the Institution’s policies;
- informs employees how allegations of wrongful conduct may be disclosed;
- protects employees from reprisal or retaliation by the Institution or an employee of the Institution; and

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- provides employees who believe they have been subject to reprisal a process to seek relief from retaliatory acts that fall within the authority of the Institution.

5.0 Policy

5.1 Reporting Misconduct or Wrongdoing

If an employee has knowledge of any misconduct or wrongdoing, the employee has a duty to report the misconduct or wrongdoing with facts and information sufficient to enable a thorough, yet discreet, investigation of the alleged activity. Examples of misconduct or wrongdoing include plagiarism, violations of federal, state or local laws, and fraudulent financial reporting.

Employees may report the suspected activity anonymously via the internet at <http://brookings.ethicspoint.com> or they may call 1-866-329-5288. Employees who rather report alleged misconduct in person may speak to any one of the following people: (1) the General Counsel; (2) the Chairperson of the Committee on Public Responsibility and Ethics; or (3) the Chairperson of the Audit Committee.

5.2 Avoiding Baseless Claims

To avoid baseless claims, employees must exercise sound judgment in assessing the validity of the suspected activity before reporting. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

5.3 Retaliation Prohibited

No employee who in good faith reports a violation shall suffer harassment, retaliation, or adverse employment consequence. Any whistleblower who believes he or she is being retaliated against must immediately report his or her belief to the General Counsel. The right of a whistleblower to protection from retaliation does not include, however, immunity for any personal wrongdoing that is alleged, investigated, and substantiated. An employee who retaliates against someone who has reported a violation is subject to discipline up to and including termination of employment.

5.4 Confidentiality and Disclosure of Reporting Individual

Although violations may be reported anonymously, the identity of a reporting employee may have to be disclosed to conduct a thorough investigation, comply with applicable state or federal law, or provide accused individuals their legal rights of defense. Employees who report alleged activity must also cooperate with any ensuing investigation.

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6.0 Responsibilities

Whistleblowers are not responsible for investigating reported misconduct or for determining fault or corrective measures. Designated Brookings personnel have been charged with investigatory responsibilities.

Misconduct or wrongdoing that is reported using the hotline or via the internet will be channeled to designated personnel depending on the nature of the violation. The designated personnel will investigate the violation and make recommendations for its resolution. Questions concerning this policy or its administration should be directed to the General Counsel.

7.0 Implementation and Related Procedures

[I will add a blurb here as soon as I learn a little more from Ethics Point about the administration of the site and whether there will be a link to the reporting site on the Brookings website.]

8.0 Approvals

Approved by Steering Committee [Date]

9.0 Reporting Contact Information

General Counsel	(202) 797-6428
Joel Z. Hyatt, Chairman of the Audit Committee	(415) 995-8282
Bart Friedman, Chairman of the Committee on Public Responsibility and Ethics	(212) 701-3304
Anonymous Reporting Hotline	1-866-329-5288
Anonymous Reporting Website	http://brookings.ethicspoint.com