

CASTING FOR RECOVERY WHISTLEBLOWER PROTECTION POLICY

Introduction and Purpose of CfR's Whistleblowing Policy

Casting for Recovery ("CfR") requires directors, officers and employees to observe high standards of business and personal ethics when conducting their duties and responsibilities. As CfR employees and representatives, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

This Whistleblowing Policy is designed to outline some of the rights and obligations those responsibilities impose. This Whistleblowing Policy is meant supplement, rather than supplant, any existing or future Code of Ethics that CfR has or might issue in the future.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that CfR can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of CfR's Code of Ethics or suspected violations of law or regulations that govern CfR's operations.

No Retaliation

It is contrary to CfR's values for anyone to retaliate or threaten to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing CfR's operations. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

CfR has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director or a board member. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Board of Trustees' Compliance Member, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the Board of Trustees' Compliance Member. The Chairperson of the Board shall be deemed to be the Trustees' Compliance Member and shall have the authority and right to seek such assistance from and to delegate responsibilities to other Trustees and persons as the Chairperson deems necessary.

Board of Trustees Compliance Member

The Board of Trustee's Compliance Member is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Member will advise the Executive Director and/or Board of Trustees as the Compliance Member deems appropriate of all complaints and their resolution and will report at least annually to the Board of Trustees' Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

CfR's Compliance Member shall immediately notify the Audit Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting 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.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. 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

CfR's Compliance Member will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Compliance Member:

Chairperson of the Board of Trustees

James P. Duffy IV
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