

**Jewish Federation of Somerset, Hunterdon & Warren Counties Whistleblower Policy- Updated 01/05/2016**

The Jewish Federation of Somerset, Hunterdon & Warren Counties is committed to maintaining the highest standards of ethical conduct. Given its mission and responsibilities, all employees, Board members, and lay volunteers have an obligation to preserve the organization's reputation and standing in the community, to uphold the public trust, and to act in an ethical and lawful manner.

**POLICY:** As part of its overall commitment to ethical conduct the Jewish Federation of Somerset, Hunterdon & Warren Counties has established this Whistleblowers Policy. The Policy has been implemented to encourage employees, Board members and volunteers to make good faith reports confidentially and without fear of reprisal of

- (i) Possible violations of Federal or State laws or regulations,
- (ii) Possible infractions of the rules and organizational policies of the Jewish Federation of Somerset, Hunterdon & Warren or
- (iii) Other concerns they may have regarding the organization's business practices.

Jewish Federation of Somerset, Hunterdon & Warren Counties has implemented numerous policies that provide for the reporting of suspected inappropriate behavior. These include a Conflicts of Interest Policy and Fiscal Internal Control Policies, among others. It is the intent of this Policy to encourage the good faith reporting of suspected violations of these Jewish Federation of Somerset, Hunterdon & Warren Counties policies.

The matters that should be reported under this Policy include suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, conflicts of interest, suspected compliance or ethics issues, or abuse, waste or misuse of Jewish Federation of Somerset, Hunterdon & Warren Counties 's assets. (Human resource issues, discrimination or harassment can also be reported using this Policy's mechanisms, but should more typically be handled as is outlined in the Jewish Federation of Somerset, Hunterdon & Warren Counties Handbook.)

**CONFIDENTIALITY AND NON-RETALIATION:** Anyone who comes forward with a good faith report of suspected illegal or unethical behavior on the part of any Jewish Federation of Somerset, Hunterdon & Warren Counties staff member, Board member, or volunteer shall be treated with respect and dignity, and will be entitled to privacy and confidentiality to the greatest extent possible. Moreover, no one who makes a good faith report under this Policy will be subject to any form of retaliation, harassment or adverse employment decision by virtue of having made such a report. Any other employee who engages in such retaliatory behavior will be subject to disciplinary action, including possible termination from employment.

**REPORTING PROCESS:** The Board of Directors is responsible for overseeing implementation of this policy. Anyone wishing to make a report may do so to any one of the following individuals: 1) The Executive Director, who has been designated as the organization's Compliance Officer, and who, as Compliance Officer, reports directly to the Board of Directors. 2) The Board President of the organization, or 3) The Treasurer. All persons receiving reports are responsible for expeditiously instituting investigative steps regarding the reported complaints and allegations.

Investigations will be undertaken to the fullest extent possible and appropriate corrective action will be recommended to the Executive Director and Executive Committee of the organization's Board of Directors. Policy Distribution Copies of this Whistleblower Policy shall be distributed to all officers, directors, employees and to volunteers who provide substantial services to the organization.