

## **Anti-Retaliation (“Whistleblower”) Policy for United Jewish Federation**

Adopted by The Board of Directors on September 27, 2016.

It is the intent of the United Jewish Federation (“UJF”) to adhere to all policies, laws, rules and regulations that apply to the organization, and the underlying purpose of this Policy is to support the organization’s goals of legal compliance. The support of all employees is necessary to achieving compliance with various policies, laws, rules and regulations. This Policy is intended to encourage and enable all UJF employees, board members, officers and volunteers (collectively, “Persons”) to raise serious concerns internally so that UJF can address and correct such inappropriate conduct and actions.

**Application:** This Whistleblower policy applies to all Persons, each of whom shall be entitled to its protection when such Person in good faith has reasonable cause to believe that a Violation has occurred.

**Reporting:** All Persons are encouraged to report information relating to (a) inappropriate conduct, policies, practices and actions, (b) illegal practices, policies or activities, (c) violations of any law, rule or regulation, or (d) violations of UJF policies (collectively, “Violations”). Such suspected Violations may include, but are not limited to, fraudulent accounting practices, unsafe conditions, or alleged discrimination or harassment.

If any Person reasonably believes in good faith that a Violation has occurred, a written complaint may be filed by that Person with the Chief Executive Officer. If the Person is not comfortable speaking with the Chief Executive Officer or the suspected Violation involves the Chief Executive Officer, then the Person should report the suspected Violation to the Personnel Vice President or to the President. **Protection from Retaliation:** No person entitled to protection shall be subjected to retaliation, intimidation, harassment or other adverse action for reporting information of a suspected Violation in accordance with this Policy or for reporting or threatening to report information to a public body. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of an in accordance with this Policy.

Any Person within UJF who retaliates against another Person who has reported a Violation in good faith or who, in good faith, had cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

A Person is protected from retaliation only if such Person in good faith has reasonable cause to believe that a Violation has occurred and brings the alleged Violation to the attention of the Chief Executive Officer or to the Personnel Vice President or to the President and provides him/her with a reasonable opportunity to investigate and correct

the alleged Violation. The protection described below is only available to a Person that complies with this requirement.

**Investigation:** The Chief Executive Officer shall promptly investigate each such report and prepare a written report to the Board of Directors. If the suspected Violation involves the Chief Executive Officer, then the President shall promptly investigate each such report and prepare a written report to the Board of Directors. In connection with such investigation, all Persons entitled to protection shall provide the Chief Executive Officer or the President, as the case may be, with credible information. All actions of the Chief Executive Officer or the President, in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all Persons entitled to protection. Appropriate corrective action will be taken by UJF if warranted by the investigation.

**Confidentiality/ Anonymous Reporting:** UJF encourages anyone reporting a suspected Violation to identify him or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted anonymously. Reports of suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable UJF or law enforcement to conduct an adequate investigation.