

WHISTLE BLOWER POLICY

MID-ISLAND Y JEWISH COMMUNITY CENTER, INC.

This policy provides a procedure for officers, directors, employees, and volunteers (collectively “employees”) of Mid-Island Y Jewish Community Center, Inc. (the “Corporation”) to report actions that they reasonably believe violates a law, regulation, or policy, or gives rise to a fraudulent accounting or other practice.

If an employee has a reasonable belief that an employee or the Corporation itself has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes fraud, the employee is expected to immediately report the information to their supervisor, the Chief Executive Officer or the President of the Corporation, or anyone in management with whom the employee is comfortable. The Secretary of the Corporation will administer this whistleblower policy and report to the Board of Directors to the board or an authorized committee of the board. Directors who are employees will not be allowed to participate in board or committee deliberations or voting relating to administration of the whistleblower policy.

The action taken will be dependent on the nature of the concern. However, a prompt investigation will be conducted by legal counsel, while maintaining the confidentiality of the complainant. To the extent possible, the complainant’s report will be acknowledged within five business days and the complainant will be notified in no more than two weeks if a broader investigation appears to be appropriate, and the form it will take. If a wider investigation is deemed appropriate, it will be conducted promptly, and a written report, including recommendations, will be submitted to the complainant, and, as appropriate, to the senior management and/or the Board of Directors. Where warranted and appropriate, corrective action will be taken. This may include, depending on the severity of the activity, a warning, letter or reprimand, suspension with or without pay, or termination of employment.

Any person who is the subject of a whistleblower complaint would not be permitted to be present at or participate in board or committee deliberations or votes on the matter relating to the complaint, though the board or committee would be allowed to request that person present background information or answer questions at a meeting prior to the commencement of deliberations or voting.

In conducting its investigation, the Corporation will strive to keep the identity of the complainant as confidential as possible. While anyone reporting an allegation is not expected to prove the truth of the allegation, the complainant should be prepared to be interviewed (unless the complaint is anonymous) and to submit whatever evidence is available in support of the allegation.

The Corporation will not and will not permit its employees to discriminate, intimidate, harass, or otherwise retaliate against any employee who (a) reports to a supervisor, to the Secretary of the Corporation, or to anyone in management what the employee believes in good faith to be illegal, fraudulent, or in violation of any policy of the Corporation; (b) participates in good faith in any resulting investigation or proceeding, or (c) exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee’s rights.

The Corporation may take disciplinary action (up to and including termination) against an employee who has engaged in retaliatory conduct in violation of this policy. Supervisors will be trained on this policy and the Corporation's prohibition against retaliation in accordance with this policy. A copy of this policy will be distributed to all employees who provide substantial services to the organization. Any questions regarding this policy may be submitted either to the Secretary of the Corporation or to the Corporation's outside counsel..