



Adopted by The Jewish Education Project Board of Directors Effective March 16, 2016. The existing Whistleblower Policy as of March 15, 2010 is hereby repealed and replaced in its entirety with the following:

Whistleblower Policy

Introduction

The Jewish Education Project is committed to the highest standards of ethical conduct. Given The Jewish Education Project's mission and responsibilities, all employees, Board members and lay leaders have an obligation to preserve the organization's reputation and standing, in our community and beyond, to uphold the public trust, and to act in an ethical and lawful manner. The Jewish Education Project requires its employees, Board members and lay leaders, if any, ("The Jewish Education Project personnel") to observe high standards of business and personal ethics, and to comply with all applicable laws and regulations, in the conduct of their duties and responsibilities for the organization. Accordingly, The Jewish Education Project may establish a Standards and Conflicts Committee, so that potential ethical issues can receive the attention they deserve.

In the event there is no Standards and Conflicts Committee, the Executive Committee shall perform such function. The Jewish Education Project's reputation for acting in accordance with the highest standards of ethical conduct is one of its most valuable assets. The assistance of all employees, Board members and lay leaders in preserving this asset is both expected and sincerely appreciated.

The Whistleblower Policy

As part of its overall commitment, The Jewish Education Project has established a Whistleblower Policy (the "Policy"). This Policy has been adopted to encourage employees and volunteers to make good faith reports of possible violations of law or infractions of rules or organizational policies by any The Jewish Education Project personnel, and to raise any concerns they may have about such matters, confidentially and without fear of retaliation, within The Jewish Education Project prior to seeking a resolution outside the organization. Reports also may be made through this process regarding inappropriate acts or possible breaches of law or established policy by entities with whom The Jewish Education Project does business, such as vendors or service providers, including investment managers or consultants.

Types of matters that should be reported under the Whistleblower Policy include suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, abuse or misuse of The Jewish Education Project's resources or assets, conflicts of interest, suspected compliance or ethics-related issues, concerns or violations, or suspected wrongdoing.



The Whistleblower Policy reporting mechanisms may also be used to report human resources issues, personal problems with co-workers or managers, or matters of workplace discrimination or harassment. However, these types of matters are more typically handled using the "Complaint Procedures" outlined in this Handbook.

Confidentiality and Non-Retaliation

In order to encourage The Jewish Education Project employees and volunteers to come forward with any good faith report of suspected illegal or unethical behavior on the part of any The Jewish Education Project personnel, all reports made through the mechanisms established under the Whistleblower Policy will be treated as confidential to the utmost extent possible.

Reports may also be made anonymously, as described below.

Moreover, no person who makes a good faith report under the Whistleblower Policy may be subject to any form of retaliation, harassment or adverse employment action. Any employee who engages in any such retaliatory action is subject to serious disciplinary action, including possible termination of employment.

The Whistleblower Process

Any person who makes a report pursuant to the Whistleblower policy will be treated with dignity and respect.

Whistleblower reports may be made as provided herein. However, these avenues are in no way restrictive; a person making a report under the Whistleblower Policy may contact any of the following persons:

Reports from Members of the Board of Directors, Lay Leaders, and Members of the Public

The Board Secretary of The Jewish Education Project has been designated as the primary recipient of complaints of wrongdoing from members of the Board of Directors, lay leaders and members of the public. The name and contact information for the Board Secretary can be obtained from the Director of Finance.

Reports from The Jewish Education Project Staff Members

The Chief Officer for Institutional Advancement has been designated as the primary recipient of complaints of wrongdoing by The Jewish Education Project staff members. The name and contact information for the Chief Officer of Institutional Advancement of The Jewish Education Project can be obtained from the Chief Operating Officer.



Reports from All Sources

All persons receiving reports are responsible for investigating and resolving all reported complaints and allegations expeditiously, and will promptly contact the complainant to acknowledge receipt of the reported concern. All reports will be promptly investigated to the extent possible and appropriate corrective action will be recommended to The Jewish Education Project's Executive Committee as and if warranted by such investigation. The Chief Officer for Institutional Advancement shall, on an annual basis, report to the Executive Committee all Whistleblower reports received during the year and any action taken thereon.

Conclusion

The Whistleblower Policy has been established as part of The Jewish Education Project's comprehensive effort to maintain the highest standards of ethical conduct. As described above, this Policy has been structured to encourage The Jewish Education Project's employees and volunteers to come forward and report, in good faith, confidentially, and without fear of reprisal, any suspected violations of law or organizational rules or policies by The Jewish Education Project personnel.

Addendum

Positions with title and contact information

Reports from Members of the Board of Directors, Lay Leaders, and Members of the Public

Board Secretary – David Rosenberg
Email: david@rosenbergfortuna.com

Reports from The Jewish Education Project Staff Members

Chief Officer for Institutional Advancement – Deborah Friedman
Email: dfriedman@jewishedproject.org
Phone: (646) 472-5335

Chief Operating Officer – Abby Knopp
Email: aknopp@jewishedproject.org
Phone: (646) 472-5378