



American Jewish Joint
Distribution Committee

JDC.org

WHISTLEBLOWER AND NON-RETALIATION POLICY

JDC is committed to ensuring that JDC maintains the highest standards of financial accounting and reporting; that JDC resources are protected from theft, misuse, misappropriation, and other conduct that may be injurious to JDC's welfare and reputation; and that JDC engages in lawful and ethical behavior.

This policy is intended to remind members of the JDC community of this expectation, to encourage the reporting of concerns about possible violations, to lay out procedures for reporting and investigating complaints, and to describe the protections afforded to complainants.

JDC's Audit Committee will oversee this policy.

Scope Of Policy:

If any member of the JDC community (including trustees, officers, employees, grant recipients, vendors, donors, or volunteers) knows or has a reasonable belief that persons associated with JDC have engaged or plan to engage in illegal or unethical conduct in connection with JDC's resources, that person is expected to file a complaint immediately, following the procedures laid out in this policy.

Issues arising under JDC's equal employment opportunity and personnel policies are not covered by this policy. Mechanisms for resolving such issues are addressed in such other policies and manuals.

Procedure For Reporting Complaints:

Complaints may be reported orally or in writing, giving as much detail as possible. Complaints should normally proceed through JDC's standard supervisory channels, beginning with the complainant's immediate supervisor. Alternatively, a complainant may report a complaint directly to JDC's Chief Compliance Officer and to a designated member of the Audit Committee. Complaints may also be made on an anonymous basis through the hotline maintained for JDC by an independent third party that is available for this purpose.² Anonymous complainants should provide sufficient facts that are capable of investigation; vague, unspecified complaints or broad allegations of wrongdoing without evidentiary, appropriate, or corroborating information will not be investigated.

² Anonymity will be maintained to the extent permitted by law.

Confidentiality:

In conducting its investigations and in reporting complaints, JDC will strive to keep as confidential as possible the identity of any complainant or any individual who provides anonymous if they choose; however, a reporter's identity may become known during the course of an investigation because of the information an individual provides. In some instances, JDC may be required to disclose the identity of the complainant, if known, either in order to ensure a proper investigation or where required by law.

Handling Of Complaints Received:

Receiving Complaints:

1. The recipient of the complaint or the hotline will promptly acknowledge each complaint.
2. The recipient of the complaint will promptly report the complaint to the Chief Compliance Officer and a designated member of the Audit Committee. Complaints received by the hotline will also be promptly reported to the Chief Compliance Officer and a designated member of the Audit Committee.
3. The Chief Compliance Officer, together with the designated member of the Audit Committee, will review and analyze the complaint as promptly as possible and assess, possibly with advice of counsel, whether it is capable of investigation and falls within this policy.
4. If the complaint is capable of investigation and falls within this policy, the Chief Compliance Officer will report it to JDC's President and Chief Executive Officer (unless the complaint involves the President or Chief Executive Officer, respectively). The Chief Compliance Officer and a designated member of the Audit Committee will then determine how the investigation should proceed. At their discretion, the complaint may also be reported to the Audit Committee at this stage for guidance on the investigation.
5. The Chief Compliance Officer, together with a designated member of the Audit Committee, will report to the Audit Committee any complaint that has been determined to be credible and material. This report will generally include a copy of the complaint and the date and nature of the complaint. It will also describe the conduct and status of any investigation and any recommendations to address the complaint.
6. The Chief Compliance Officer or a designated Officer of JDC will inform the complainant generally of the handling of the complaint and, if determined necessary, how JDC has generally addressed the complaint.

Alternate Procedures for Receiving Complaints Involving the Chief Compliance Officer:

Where a complaint involves the Chief Compliance Officer, the following alternate procedures should be followed:

1. The recipient of the complaint or the hotline will report the complaint to a designated member of the Audit Committee and the Chair of the Audit Committee.
2. The Chair of the Audit Committee, together with a designated member of the Audit Committee will determine, possibly with advice of counsel, how to investigate the complaint in accordance with this policy.
3. The Chair of the Audit Committee will report to the Audit Committee in accordance with this policy any complaint that has been determined to be credible and material.

Action on Complaints:

The Audit Committee, with input from JDC's management or the Legal Committee, as appropriate, will decide upon appropriate action in response to any complaints, including disciplinary action (up to and including termination of employment or removal from office or the Board of Trustees) against any person who, in the Audit Committee's assessment, has engaged in unethical conduct or misconduct and, where appropriate, reporting of such misconduct to the relevant civil or criminal authorities.

The Chief Compliance Officer (or Chair of the Audit Committee, as applicable) will ensure that records of all complaints are maintained for four years.

Protection Under Policy:

The JDC will not knowingly, with the intent to retaliate, take any action harmful to any member of the JDC community for:

1. Reporting a complaint in good faith pursuant to this policy or to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant;
2. Providing in good faith information regarding a complaint to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant, or otherwise assisting in any investigation conducted by the JDC; or
3. Otherwise participating or assisting in a proceeding filed or about to be filed.

Any person who retaliates against another for reporting a complaint in good faith pursuant to this policy will be subject to disciplinary action, up to and

including termination from employment or removal as an officer or from the Board of Trustees.

Any person who deliberately or maliciously provides false information may be subject to disciplinary action, up to and including termination of employment or removal as an officer or from the Board of Trustees.

Contact Information:

Chief Compliance Officer:

Name: Guy Billauer
Address: 711 Third Avenue, New York, NY 10017
Phone: 212-885-0863
Email: guy.billauer@jdcny.org

Chair of the Audit Committee:

Name: Geoffrey Colvin
Address: CEW Partners, 780 Third Avenue, 22nd Floor
New York, NY 10017
Phone: 212-757-1544
Email: gc@cewpartners.com

Anonymous Reporting Hotline:

- Toll-Free Telephone:
 - English speaking USA and Canada: (855) 900-0028
(not available from Mexico)
 - Spanish speaking North America: (800) 216-1288
(from Mexico user must dial 001-800-216-1288);
 - Callers outside of North America please click here for instructions
- Website: <http://www.lighthouse-services.com/jdc>
- Email: reports@lighthouse-services.com
(must include organization name with report).
- Fax: (215) 689-3885
(must include organization name with report).