

WHISTLEBLOWER: NON-INTIMIDATION / NON-RETALIATION POLICY

AHRC Nassau requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of AHRC Nassau, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that AHRC Nassau can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of AHRC Nassau's code of ethics or suspected violations of law or regulations that govern AHRC Nassau's operations.

No Intimidation, No Retaliation

No director, officer, employee or volunteer of AHRC Nassau who in good faith reports any action or suspected action taken by or within AHRC Nassau that is illegal, fraudulent, or in violation of any adopted policy of the corporation shall suffer intimidation, harassment, discrimination or other retaliation, or in the case of employees, adverse employment consequence.

If an AHRC Nassau director, officer, employee or volunteer believes in good faith that he or she has been intimidated and/or retaliated against for initiating a report or complaint, or for participating in any investigation related to such report or complaint, then the AHRC Nassau director, officer, employee or volunteer should report the alleged intimidation and/or retaliation to his or her supervisor, program director, the Compliance Officer or AHRC Nassau's Compliance Hotline as soon as possible. Any supervisor or program director who receives a report of alleged intimidation and/or retaliation shall immediately notify AHRC Nassau's Corporate Compliance Officer.

A thorough and objective investigation will be conducted of all such reports. Anyone found to have intimidated, threatened retaliation or who have actually retaliated against a whistleblower will be subject to appropriate disciplinary action, up to and including, termination.

Any staff person who knowingly files a false report of misconduct will be subject to disciplinary action, up to and including, termination.

Reporting Procedure

AHRC Nassau has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor and/or their program director. If you are not comfortable speaking with your supervisor or program director, or you are not satisfied with your supervisor's or program director's response, you are encouraged to communicate with the Corporate Compliance Officer or to report your concern or complaint through AHRC Nassau's Compliance Hotline.

AHRC Nassau
Policies and Procedures

Employees, directors, officers, and volunteers are required to report any known or suspected violations of the Corporate Compliance Plan, Code of Conduct, policies and procedures or any of the laws, rules or regulations by which AHRC Nassau is governed, to their supervisor, their program director, the Corporate Compliance Officer or through AHRC Nassau's Compliance Hotline. Any supervisor or program director who receives a report of a suspected violation shall immediately notify AHRC Nassau's Corporate Compliance Officer.

Confidentiality

Any employee, director, officer or volunteer may make reports pursuant to this policy confidentially or anonymously. AHRC Nassau has established and maintains a confidential telephone number [516-686-4450] to receive reports of complaints. The identity of a whistleblower will be kept confidential and only disclosed with the consent of the whistleblower, to comply with law or when extraordinary circumstances exist. In the latter case, the decision to disclose the identity of whistleblowers rests with AHRC Nassau's Compliance Officer.

All investigations of reported matters will be conducted in a confidential manner so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

Compliance Officer

AHRC Nassau's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Compliance Committee (made up of independent directors) on compliance activity relating to such reports.

Handling of Reported Violations

When possible, AHRC Nassau's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.