Whistleblower Policy

The Mosholu Montefiore Community Center, Inc. (“Agency”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Mosholu Montefiore Community Center, Inc., 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 the Mosholu Montefiore Community Center, Inc. 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 the Mosholu Montefiore Community Center, Inc.’s code of ethics or suspected violations of law or regulations that govern Mosholu Montefiore Community Center, Inc.’s operations.

No Retaliation
It is contrary to the values of the Mosholu Montefiore Community Center, Inc. for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the Mosholu Montefiore Community Center, Inc. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure
The Mosholu Montefiore Community Center, Inc. has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Executive Director, Associate Executive Director, Human Resources Director or your Union Shop Steward (“Compliance Officers”). Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Mosholu Montefiore Community Center, Inc.’s Executive Director, Associate Executive Director or Human Resources Director, who has the responsibility to investigate all reported complaints.

Compliance Officers
The Mosholu Montefiore Community Center, Inc.’s Executive Director, Associate Executive Director, Human Resources Director or Union Shop Steward is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. These Compliance Officers will advise the
Board of all complaints and their resolution and will report at least annually to the Chief Financial Officer ("CFO") on compliance activity relating to accounting or alleged financial improprieties.

**Accounting and Auditing Matters**
The Mosholu Montefiore Community Center, Inc.’s Compliance Officers shall immediately notify the Chief Financial Officer ("CFO") of any concerns or complaints regarding Agency accounting practices, internal controls or auditing and work with the Compliance Officers until the matter is resolved.

**Acting in Good Faith**
Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**Confidentiality**
Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations**
The Agency’s Compliance Officers 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.

**Compliance Officers**
Ms. Rita Santelia, LMSW
Chief Executive Officer
718-882-4000 ext. 278

Ms. Jennifer Esmurdoc
Human Resources Director
718-882-4000 ext. 242

Ms. Fran Namzoff
Union Shop Steward
718-882-4000 ext. 265

Policy approved by the Board of Directors on September 16th, 2014

**Board Member**
Natly Esnard
Co-Chair
718-798-3773