

## **PROGRAM TO DETECT AND DETER UNLAWFUL OR UNETHICAL BEHAVIOR**

The Jewish United Fund, Jewish Federation, and JFMC Facilities Corporation (hereafter referred to as JUF), wishes to state and explain its policy prohibiting employees from engaging in unlawful or unethical behavior in connection with their duties and responsibilities and JUF's program to detect and deter such behavior.

### **Policy Statement**

JUF prohibits unlawful or unethical behavior by any employee in connection with their work for JUF. Such conduct is contrary to the high standards of integrity expected of JUF employees who have a responsibility both to clients and to the community at large whose contributions support Agency programs. Unlawful or unethical conduct of any type will be grounds for appropriate discipline.

### **Policy Definition**

Unlawful or unethical behavior includes, but is not limited to, any of the following conduct by any employee of JUF:

Bribery or attempted bribery of an employee or agent of any governmental Agency, private firm or other person or entity with whom the JUF is doing business or is seeking to do business or who is seeking business from the JUF;

Conflict of interest, including engaging in any activity for remuneration which conflicts directly or indirectly with the business of the JUF or any Agency affiliated with JUF ("Agency"), unless the activity has been approved in writing by the Chairman or President or someone designated by the Chairman or President;

Fraud;

Misappropriation, theft or conversion of money or property belonging to the JUF, an Agency, or Agency client, including information in the JUF or Agency's computer data base;

Sexual harassment, or any other harassment of any person based upon that person's race, color, sex, religion, creed, national origin, ancestry, age, disability, marital status or other status which is protected from harassment by federal law, or by applicable state or local law;

Soliciting or accepting money or any thing of value from:

1. any client or prospective client of any Agency or any family member of any Agency client or prospective client; or

2. any person or entity doing business with the JUF or any Agency or seeking to do business with the JUF or any Agency where a reasonable person would conclude that the employee acted for personal gain.

The prohibitions of the above paragraph “(2)” do not apply to: (i) soliciting or accepting charitable contributions from a donor or prospective donor solely on behalf of the JUF or an Agency where the employee’s job or position within the JUF or an Agency involves such activities; (ii) transacting business solely on behalf of the JUF or an Agency by an employee in the normal course of the employee’s work-related activities; or (iii) accepting invitations to events or participating in activities as the guest of a donor, prospective donor, or someone doing business or seeking to do business with the JUF or an Agency where the employee’s position is such that a reasonable person would conclude that such acceptance or participation was appropriate for an employee in such a position in the interest of the JUF or an Agency and not for the employee’s personal gain.

Spending or expending JUF or Agency funds for personal use;

Unauthorized computer access or computer use;

Aiding or abetting any other employee or person in any unlawful or unethical behavior, including failure to report obvious unlawful or unethical behavior.

### **Detection and Deterrence**

Any employee who becomes aware of any apparent unlawful or unethical behavior in violation of this policy on the part of any other JUF or Agency employee acting on behalf of the JUF or Agency should report the matter to the Vice President of Human Resources, the Chief of Staff and/or the President or place an anonymous report through the online portal at [www.juf.org/whistleblower](http://www.juf.org/whistleblower).

Such report should be as specific as possible and include the name of the employee who engaged in the apparent unlawful or unethical behavior, a description of the behavior, the circumstances in which knowledge of the behavior was obtained, the name of the employee reporting the behavior, the names of any other persons who the reporting employee believes are witness to or have knowledge of the behavior, and any documentary evidence of the behavior.

An investigation regarding any incident so reported will be conducted by the Vice President of Human Resources, the Chief of Staff and/or the President or the President’s designee.

Any investigation of any report under this policy will be conducted with due regard to the sensitivity of the matter. All parties will be given the utmost protection and privacy to the extent consistent with a fair investigation.

If the report is determined to be valid or if the investigation discloses other unlawful or unethical behavior of any type prohibited by this policy, the employee engaging in the unlawful or unethical behavior will be discharged.

**Protection from Retaliation**

Any individual who reports apparent unlawful or unethical behavior will suffer no retaliation for reports made in good faith and/or honest belief that the behavior reported was unlawful or unethical.

Any questions about this policy should be directed to the Vice President of Human Resources, the Chief of Staff and/or the President.