



SUBJECT: Whistleblower Policy
PROGRAM: Agency
MANUAL: Agency Administrative Manual
POLICY NUMBER: 12023
APPROVED:

DATE APPROVED: 4/13/10
DATE REVISED:
LAST DATE REVISED:

NAME: Jennifer Kindle-Sheppard 
SIGNATURE:
TITLE: Director of Corporate Compliance

NAME: Uday Madasu 
SIGNATURE:
TITLE: Chief Information Officer

As part of its commitment to ethical and legal conduct, JBFCS expects its employees to bring to its attention information about suspected non-compliance or violations of law or improper conduct by any JBFCS employee or agency, including, but not limited to:

- An activity, policy or practice of JBFCS, or another employer, with whom there is a business relationship, that the employee reasonably believes is in violation of or non-compliance with a law, or a rule or regulation promulgated pursuant to law;
- An activity, policy or practice of JBFCS, or another employer, with whom there is a business relationship, that the employee reasonably believes is fraudulent or criminal;
- A breach of or failure to comply with any applicable laws, including securities, banking, fraud, employment and all other laws;
- Financial malpractice, impropriety, or fraud, including questionable accounting or auditing matters;
- Dangers in health, safety or the environment; and
- Attempts to conceal any of the above.

Employees are required to come forward with any such information, without regard to the identity or position of the suspected offender.

Employees who knowingly attempt to alter, conceal, cover up, falsify or destroy any documents or tangible items to prevent their use in an official proceeding or influence the investigation may be subject to criminal penalties and fines.

Because failure to report criminal activity can itself be understood to condone the crime, we emphasize the importance of reporting. Failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report.

Complaint Procedure

Employees who have information about suspected improprieties who could endanger health or safety, improper accounting or auditing matters, or any other type of conduct identified in this policy, should bring it to the attention of their supervisors and/or JBFCS' Corporate Compliance Officer and or General Counsel, or submit an anonymous complaint to the JBFCS Corporate Compliance Hotline.

Investigation

Reports of violations will be investigated under the Corporate Compliance Officer or General Counsel's supervision, as he or she finds appropriate. Employees are expected to cooperate in the investigation of reported violations.

Company will treat all disclosures and concerns in a confidential and sensitive manner to the extent possible consistent with conducting a thorough investigation. Employees should be aware that the Corporate Compliance Officer or General Counsel, and those assisting him or her are obligated to act in the best interests of the Company, and do not act as personal representatives or lawyers for employees.

Protection Against Retaliation

Company will not take any retaliatory action against any employee who provides information or assists in an investigation regarding any conduct which that employee reasonably believed violates law or a rule or regulation promulgated pursuant to law, company policy, or accounting/auditing standards. Acts of retaliation should be reported immediately and will be disciplined appropriately.

Further questions

If you have any further questions in relation to this policy, please contact JBFCS' Corporate Compliance Officer at (212) 632-4509 or General Counsel at (212) 632-4794.