

## **Hillel at Stanford Whistleblower Policy PASSED 10/7/2018**

Hillel@Stanford is committed to the highest possible standards of openness, propriety and accountability. In line with this commitment, we expect and want our employees or anyone else who has serious concerns about any aspect of Hillel's business to come forward and voice those concerns. However, Hillel requires more than just a willingness and commitment. It requires that all employees as well as any board member recognize and acknowledge that it is their responsibility to promptly report any instance of suspected or known non-compliance or if they learn of, or are asked to, participate in an activity that could potentially violate or is suspected or known to violate any Hillel policy or any law or regulation. This policy makes it clear that an employee can make a report without fear of retaliation of any kind, including but not limited to discrimination or harassment, if the employee has a reasonable belief that they have made any disclosure in good faith.

All employees of Hillel are encouraged to report all evidence of activity by any employee that may constitute:

1. an instance of fraud of any kind, including but not limited to corporate fraud or any other act of dishonesty;
2. unethical business conduct;
3. a violation of federal, state, local or any other law; or
4. substantial and specific danger to the employee's or public's health and safety.

Any employee who in good faith reports such incidents as described above will be protected from any sort of retaliation. In addition, no employee may be adversely affected because the employee refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of federal, state, local or any other law.

Any person who wants to report evidence of alleged improper activity may make a confidential report to the Ombudsperson, whose contact information can be found in the Employee Handbook and on the Hillel@Stanford website. Reporters are encouraged to provide as much specific information as possible including names, dates, places, and events that took place, the reporter's perception of why the incident(s) may be a violation, and what action the reporter recommends be taken. The Ombudsperson will refer any report of accounting or financial irregularities to the Chair of the Audit Committee for investigation. All other matters will be reported to the Board President, who will confer with the Executive Committee (which functions as the Personnel Committee) to determine the most appropriate method for investigation, including the engagement of independent legal counsel, where indicated.

The above Hillel@Stanford representatives and officers shall, in the reasonable and exclusive exercise of their discretion, and consistent with any and all applicable laws and regulations, the best interests of Hillel@Stanford, as well as the wishes of the Reporter, have the right to maintain the confidentiality of reports of concerns, investigations and any related issues, including but not limited to the allegations and the identities of the Reporter, the person against whom allegations are made, and other reporters and witnesses.