

## WHISTLEBLOWER POLICY

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

The SJJCC is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers.

This policy outlines a procedure for employees to report actions that an employee reasonably believes violates a law, or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter which is related to the SJJCC's business and does not relate to private acts of an individual not connected to the business of the SJJCC.

## **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the SJJCC 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 SJJCC's code of ethics or suspected violations of law or regulations that govern the SJJCC's operations.

## No Retaliation

It is contrary to the values of the SJJCC 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 SJJCC.

This policy provides that no director, officer, employee or volunteer who in good faith reports any action or suspected action taken by or within the SJJCC that is illegal, fraudulent, or in violation of legally required policies of the SJJCC shall suffer intimidation, harassment, discrimination, or other retaliation or in the case of employees, adverse employment actions. In addition, the SJJCC will not, with the intent to retaliate, take any action harmful to any employee who has provided to law enforcement personnel or a court truthful information relating to the commission or possible commission by the SJJCC or any of its employees of a violation of any applicable law or regulation.

The SJJCC may take disciplinary action (up to and including termination) against an employee who in management's assessment has engaged in retaliatory conduct in violation of this policy.