Whistleblower Policy

General
BronxWorks requires its 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 BronxWorks, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

The matters which should be reported under this policy include any actual or suspected violations of high business and personal ethical standards, including fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of BronxWorks assets, suspected regulatory or compliance violations, serious health and safety concerns, and any suspected financial wrongdoing (collectively referred to herein as “Misconduct”).

This policy is not a vehicle for reporting violations of BronxWorks applicable human resources policies, problems or differences of opinion with co-workers or supervisors, or for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful workplace harassment, all of which must be reported in accordance with BronxWorks Agency Guidelines, as it is those policies that are applicable to such matters.

Reporting Responsibility
Reporting Misconduct so it is properly addressed is everyone’s responsibility, regardless of position. All directors, officers, and employees are required to report actual or suspected Misconduct as soon as they become aware. All directors, officers, and employees have both the duty to report Misconduct, and the right to do so without fear of reprisal.

Any failure by any employee to immediately report Misconduct of which you become aware, in sufficient detail to allow an effective investigation, and any failure to diligently assist in the investigation or resolution of the Misconduct, represents an unacceptable violation of BronxWorks policy and will lead to sanctions up to and including termination of employment.

No Retaliation
This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within BronxWorks prior to seeking resolution outside BronxWorks. No director, officer, or employee who in good faith reports Misconduct shall suffer intimidation, harassment, retaliation or adverse employment consequence of any kind, even if the report is mistaken, as long as the reporting individual is not a party to any fraudulent, illegal, or other improper or prohibited activity. BronxWorks strictly prohibits its employees from engaging in any act, conduct, or behavior which results in, or is intended to result in, the intimidation of or retaliation against any employee for
reporting Misconduct in good faith, or for participating in good faith in the investigation, self-evaluation, audit, or corrective action thereof. Any retaliation or threat of retaliation prohibited by this section is a violation of BronxWorks policy and may result in discipline up to and including termination of employment. Personnel should immediately report any such retaliation to the Compliance Officer or Compliance Hotline.

Good Faith

Anyone reporting Misconduct must act in good faith and have reasonable grounds for believing the information disclosed may indicate a violation of applicable law, regulation, policy and/or ethical standards. Any allegations that prove to be unsubstantiated and made maliciously or with knowledge that they were false will be viewed as a serious disciplinary offense. Deliberately and knowingly making a false report is not a protected activity and will result in appropriate sanctions including and up to termination of employment.

How to Report

**How to Report Misconduct:** As a BronxWorks employee, you are required report Misconduct to your supervisor immediately after you first become aware of it. If you do not feel comfortable doing that, you may report the issue to the Compliance Officer by using the email address or mailing address set forth below, or submit an anonymous report via the Compliance Hotline. If you do not feel comfortable with any of those options or are not satisfied with the response, you may report the Misconduct to the Chair of the Finance and Audit Committee of the BronxWorks Board of Directors, using the email address provided below. Regardless of how you choose to report your concern, you are required to provide enough detail for an effective investigation to occur.

**Following Up the Chain of Command:** If you are unsatisfied with the response or have additional concerns, you must continue to raise the issue through the supervisory structure or to the Compliance Officer or Compliance Hotline. Managers and supervisors at all levels are required to maintain an “open-door policy” and to be receptive to all employee reports of problems and concerns.

**The Compliance Officer:** The General Counsel serves as the “Compliance Officer” responsible for investigating and addressing all Misconduct. You may report Misconduct directly to the Compliance Officer, Erica Coleman, by mail at 60 East Tremont Avenue, Bronx, New York 10453 or by email at ecoleman@bronxworks.org.

**Compliance Hotline:** You may submit a report to the Compliance Hotline. The preferred method is to complete the online form at [www.lighthouse-services.com/bronxworks](http://www.lighthouse-services.com/bronxworks). You may also submit a report by phone at 844-440-0061 (English) or 800-216-1288 (Spanish). When reporting Misconduct to the Compliance Hotline, you may choose to identify yourself or you may remain anonymous. Reports submitted to the Compliance Hotline will be received by the Executive Director, Compliance Officer, and Director of Quality and Compliance.
Chair of Finance and Audit Committee of BronxWorks Board of Directors: If you are unsatisfied with the response or do not feel comfortable with any of the alternative reporting options, directors, officers and employees may report Misconduct to the Chair of the Finance and Audit Committee of the BronxWorks Board of Directors via email at financeboard@bronxworks.org.

Anonymous Reports
No attempt will be made to identify a person who reports Misconduct anonymously. It may not be possible, however, to preserve the anonymity of reporters who identify themselves, provide other information that identifies them, if the investigation reveals their identity, or if they inform others that they have reported Misconduct. Anonymous reports of Misconduct will be accepted. However, this Whistleblower Policy encourages directors, officers and employees to identify themselves when reporting Misconduct, to allow for a full and thorough investigation. Appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.

Confidentiality
Misconduct may be reported on a confidential basis. Such reports will be kept confidential to the extent possible, as consistent with the need to conduct an adequate investigation.

What Happens Next?

Misconduct Reported to the Compliance Officer: Except in cases of an anonymous report, the Compliance Officer will acknowledge receipt of the reported Misconduct within ten (10) business days. The Compliance Officer or his or her designee will promptly investigate all reported Misconduct which in the Compliance Officer’s judgment warrant being investigated. The Compliance Officer or his or her designee will take or effectuate appropriate corrective action if warranted by the investigation. The Compliance Officer must inform the Finance and Audit Committee Chair of any reported Misconduct involving financial wrongdoing within five (5) business days of receipt. The Compliance Officer is responsible for presenting a written report of all reports of Misconduct, investigations and action taken, if any, to the full Board of Directors on an annual basis.

Misconduct Reported to the Chair of the Finance and Audit Committee: Except in cases of an anonymous report, the Chair of the Finance and Audit Committee (the “Chair”) will acknowledge receipt of the reported Misconduct within ten (10) business days. The Chair is responsible for ensuring that all Misconduct reported to the Chair is reviewed and investigated if, in the Chair’s judgment, investigation is warranted. The Chair is responsible for ensuring that appropriate corrective action is taken if warranted by the investigation in the judgment of the Chair. The Chair shall advise the Finance and Audit Committee and, if the Chair deems it appropriate, the Executive Director, of all reports of Misconduct. The Chair is required to report to the full Board of Directors at least annually on all reports of Misconduct, investigations and action taken, if any.
Accounting and Auditing Matters

The Finance and Audit Committee shall address all reported Misconduct regarding corporate accounting practices, internal controls or auditing brought to its attention. The Chair of the Finance and Audit Committee shall immediately notify the Finance and Audit Committee of any such report and work with the Committee until the matter is resolved.

Board Deliberations

Any person who is the subject of a whistleblower complaint not be present at or participate in any Board or Board committee deliberations or vote on the matter relating to such complaint, provided that nothing in this subparagraph shall prohibit the Board or committee from requesting that the person who is subject to the complaint present information as background or answer questions at a committee or Board meeting prior to the commencement of deliberations or voting relating thereto.

Distribution

A copy of this Whistleblower Policy must be distributed to all directors, officers, employees and to volunteers who provide substantial services to BronxWorks. Posting a copy of this Whistleblower Policy on the BronxWorks website or at BronxWorks offices in a conspicuous location accessible to employees and volunteers are among the methods BronxWorks may use to satisfy this distribution requirement.