1- Jewish El Paso expects its Directors, Officers, Staff and other representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, as well as compliance with all applicable Federal and State laws and regulations.

2- It is the responsibility of all Directors, Officers and Staff to report any wrongful conduct in accordance with this whistleblower policy.

3- “Wrongful Conduct” is defined in this whistleblower policy to include: a violation of applicable State and/or Federal laws or regulations; use of Jewish El Paso property, resources, or authority for personal gain or non-organization-related purpose except as provided under Jewish El Paso policy.

4- No Retaliation No Director, Officer or member of the Staff who in good faith reports Wrongful Conduct will suffer harassment, retaliation or adverse employment consequences as a result of his/her reporting of wrongful conduct. Any Director, Officer, or Staff member who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to disciplinary action up to and including termination of employment or removal from the Board of Directors or Executive Committee, as applicable. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the framework of Jewish El Paso prior to seeking resolution outside that framework.

5- Reporting Wrongful Conduct: Jewish El Paso encourages its Directors, Officers and Staff members to share their questions, concerns, misgivings, suggestions or complaints with someone who can address them properly. Any Director, Officer or Employee may report Wrongful Conduct to the Executive Director or the President of the Board of Directors. If the Wrongful Conduct involves one or both the Executive Director and/or the President, or if the reporting individual is not comfortable speaking with or not satisfied with the response of those individuals, the issue may be reported to any member of the Board. Upon report, the Executive Director, President or Director must notify to the full Board that an alleged Wrongful Conduct report was made and is being investigated.

6- Acting in Good Faith: Anyone filing a complaint of Wrongful Conduct must be acting in Good Faith and have reasonable grounds that the information disclosed indicated Wrongful Conduct. Any allegation that proves not to be substantiated and/or which is proven to have been made maliciously or with knowledge of it being false will be considered a serious disciplinary offense.

7- Confidentiality: Reports of Wrongful Conduct or suspected Wrongful Conduct may be submitted on a confidential basis or may be submitted anonymously. Reports of Wrongful Conduct or suspected Wrongful Conduct will be kept confidential to the extent possible, consistent with the needs to conduct an adequate investigation.

8- Handling of Reported Wrongful Conduct: A representative of the Board will acknowledge receipt of the allegation within five business days, unless such report was filed anonymously. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.