

Whistleblower Policy

General

Maccabi USA ("Organization") has a Code of Ethics and Conduct ("Code") that requires 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 the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

All officers, directors, employees, and agents of the Organization are required to report any fraudulent activity, misuse of funds, or violations or suspected violations of law or of the Code policy in accordance with this Whistleblower Policy. Such reports are encouraged to be made in writing so as to assure a clear understanding of the issues but may be oral. Such reports should be factual rather than speculative and should contain specific information to allow for proper assessment of the nature, extent and urgency of the issues raised in the report. Employees are encouraged to provide names, dates, places and events that took place, and the employee's (or officer's or director's) perception of why the incident(s) constitute an improper activity.

No Retaliation

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Reporting Violations

Employees may make reports under this Whistleblower Policy to their supervisor, or to the Executive Director or Office Manager; provided, however, that any complaint involving a supervisor, or Executive Director or Office Manager, or anyone not a part of the Organization's staff should be reported directly to the Compliance Officer, who also serves as Personnel Chair, provided further, that any complaint involving the Compliance Officer may also be reported to the President of the Organization.

Any supervisor or other staff representative who receives a complaint under this Whistleblower Policy must notify the Compliance Officer, except where the complaint in question involves the Compliance Officer, in which case, the supervisor must notify the President of the Organization.

Compliance Officer

The Organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his or her discretion, shall advise the Executive Director and/or the Personnel Committee. The Compliance Officer has direct access to the Personnel Committee of the board of directors and is required to report to the Personnel Committee at least annually on compliance activity. The Organization's Compliance Officer is the chair of the Personnel Committee.

Accounting and Auditing Matters

The Budget/Finance/Administration Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Budget/Finance/Administration Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Organization will promptly and thoroughly investigate all complaints in the manner and to the extent deemed reasonably necessary. The Organization will take appropriate corrective action to address the complaint if warranted.