



WHISTLEBLOWER PROTECTION POLICY

I. PURPOSE

To communicate to Sick Kids (Need) Involved People of New York, Inc. ("SKIP"), Directors, Officers, employees or volunteers ("SKIP Personnel") their right to report information concerning alleged improper service delivery or illegal action(s) to SKIP management or to outside officials, without fear of intimidation, harassment, retaliation, discrimination or other adverse employment consequences. Capitalized terms used but not defined herein shall have the meanings assigned to such terms in the By-laws.

II. POLICY

There will be no intimidation, harassment, retaliation, discrimination or other adverse employment consequences against those who, in good faith disclose improper, illegal, or fraudulent action(s) or suspected action(s), or action(s) or suspected action(s) in violation of adopted corporate policy by or within SKIP to SKIP management or to outside officials. This policy will be administered by the Director of Human Resources and Operations, who will report to the Board of Directors the manners and means of the administration of this policy.

III. PROCEDURE

Any SKIP Personnel who, in good faith, has reason to believe that improper service delivery or illegal action has been taken by another SKIP Personnel is encouraged to report such actions.

Improper service delivery or illegal action may be reported to the Executive Director, Human Resources Director, Supervisor, Board Member or to an appropriate official outside of SKIP. Except in an emergency, the employee shall submit a written report to the individual to whom the action is reported.

Upon receipt of notification of allegations, SKIP's representative(s) will immediately notify the appropriate Management personnel and the Executive Director, if the Executive Director has not received prior notification. A confidential investigation will be conducted within 30 calendar days.

If filed in-house, the Executive Director, or designee will respond to the employee in writing. This communication will include written findings, conclusions, and recommendations, if any, to be provided to the Board of Directors.

If a matter is referred to the Board of Directors, the Board will fully investigate the matter. A final written disposition of the matter will be forwarded to the individual making the report. If the individual is not satisfied with the disposition, she or he may pursue the matter with outside officials.

The identity of the reporting employee will be kept confidential to the extent possible under the law, unless the associate authorizes the disclosure of his/her identity in writing.

Updated July 18, 2014