

H.E.S. Whistle Blower Policy

Policy:

Any H.E.S. employee may submit a good faith complaint regarding possible violations of law or infractions of rules or organizational policies and practices to the "Ombudsmen" listed below without fear of dismissal or other retaliation of any kind.

We are designating two "ombudsmen" persons authorized to receive information regarding possible violations of law or infractions of rules or organizational policies, as well as to take appropriate steps in response to such reports. The Board President has been designated as the primary ombudsman to receive such complaints of wrongdoing from members of the Board of Directors, staff members and vendors. H.E.S.' Executive Director has been designated as the primary ombudsman to receive such reports of wrongdoing from general public.

- H.E.S. Board President may be reached directly at whistleblower@thehes.org
- H.E.S. Executive Director - Moshit Rivkin can be reached at 718.241.3000 Ext. 121 or Moshit@thehes.org

Non-Retaliation:

If an individual makes a report regarding possible violations of law or infractions of rules or organizational policies in good faith, the individual will not be disciplined or otherwise penalized because of the report, regardless of whether or not the report is sustained.

If you have any questions, please do not hesitate to contact either of us. Many thanks.

Procedures:

1. All "whistleblower" type complaints reported to H.E.S. executive staff will be communicated to the identified Board representative or Board President and specified as "groundless", "investigated no further action recommended" or "investigated and description of action to be taken".
 - a) The executive director will have decisions to "take action" reviewed by the identified Board representative or Board President prior to taking action.
 - b) If the nature of complaint necessitates immediate action be taken by the executive director, it will be reported to the identified Board representative and President as soon as possible.
 - c) Any "action taken" or "further investigation" will be reported to the Board at the next scheduled Board meeting
 - d) The identified Board representative or Board President, after reviewing complaints specified as "groundless" or "investigated no further action taken" will determine if they will be reported to the Board at the next scheduled Board meeting.
2. "Whistle Blower" type complaints sent to the H.E.S. Board of Directors, or any specific Board member, must be reviewed by the identified Board representative who will recommend "groundless", "further investigation required" or "action to be taken".

- a) All “whistleblower” type complaints sent to any Board member or the identified Board representative will be reported to the Board President along with the concomitant recommendation.
- b) The identified Board representative, with the agreement of the Board President or in his absence another Board officer, is empowered to initiate a further investigation or to take action if the nature of the complaint necessitates action be taken before the next regularly scheduled Board meeting.
- c) Any “whistleblower” type complaint received by the identified Board representative that is recommended for “further investigation” or “action to be taken” will be reported at the next scheduled Board meeting.
- d) The identified Board representative and Board President, after review of complaints recommended as “groundless” or “investigated no further action recommended” will determine if they should be reported to the Board at the next scheduled Board meeting.