

Whistleblower and Protected Disclosure Policy

 <p><i>Housing for all of the People</i></p> <p>Kimmel Housing Development Foundation, Inc.</p>	Policy and Procedure Manual
	Board of Directors and Governance
	Effective Date: January 1, 2009
	Total Number of Pages: 2

Purpose

The purpose of this document is to describe the policy of the Kimmel Housing Development Foundation, Inc. (referred to hereafter as the Foundation) relating to complaints (“whistleblowing”). This policy is designed to provide a mechanism for employees, and others, to “blow the whistle” and provide notice of complaints on activities contrary to the Foundation’s Code of Ethics and Business Conduct (the “Code”) while at the same time protecting employees from retaliation for whistleblowing. Proper reporting of concerns for violations of the Code is considered by the Foundation to be a “protected disclosure”, is encouraged and shall be free of retaliation.

Discussion of the Policy

A whistleblower is a person or entity that makes a protected disclosure. A protected disclosure is a communication made in good faith that discloses a potential violation of the Foundation’s Code. The protected disclosure may be related to suspected violations of laws, regulations, ethics, accounting or financial matters, or any of the Foundation’s policies.

It is the policy of the Foundation that any employee suspecting, in good faith, that a violation of the Code has, will, or may likely occur has a duty to report the violation to the Foundation and that they shall be able to do so without fear of retaliation, harassment, or dismissal. The Foundation also encourages others dealing with the Foundation, its employees or its business associates, to report suspected violations or wrongdoing.

Generally, complaints relating to violations of the Code should be made to the Chair of the Audit Committee or to the Foundation’s Legal Counsel. The Foundation’s Audit Committee Chair or General Counsel shall receive and

determine how and whether to investigate whistleblower complaints as they may determine, reporting to the Board with regard to such matters.

Protection under this policy does not extend to false or bogus allegations knowingly made by a whistleblower. Any person making allegations in bad faith may be subject to disciplinary or other legal actions.

Procedures

To File a Whistleblower Complaint:

Send mail to the Foundation's General Counsel, marked Confidential, c/o:
1438 Third Avenue, 29B, New York, New York 10028

Or

Send mail addressed to the Foundation's Audit Committee Chair, marked Confidential, c/o 237 Schenck Avenue, Great Neck, New York 10021

Correspondence may be anonymous. You may also leave a recorded message by calling 516-383-0337.

Responsibilities

It is the responsibility of all Directors and Employees to comply with the Foundation's Code and to report any suspected violations of our policies.

It is the responsibility of the Audit Committee or General Counsel to establish procedures in order to track the receipt of protected disclosures and any investigation and resolution of complaints.

Revision History Information:

This document was reviewed and approved by the Kimmel Housing Development Foundation, Inc.'s Board of Directors and is effective as of January 1, 2009.

Distribution: All Directors, advisors to the Board, volunteers and employees receive a copy of this policy and provide a written confirmation of receipt of the Code and this policy.