



# Whistleblower Policy

## I. Purpose

Ethics and integrity are among our core values at Einstein. We expect all Einstein employees and volunteers to fulfill their duties with integrity and in full compliance with existing law, regulations and Einstein's own operating policies and procedures. To that end, Einstein provides a compliance hotline which can be used to raise good faith concerns about behavior by and within Einstein that is, or appears to be, illegal, fraudulent or in violation of policy. The hotline should not be used to report complaints about workplace issues, disputes or grievances. These issues are addressed according to Einstein's personnel policies and procedures.

## II. Scope

This policy applies to all Einstein employees and students.

## III. Policy

Reports of acts of discrimination and harassment should be made in accordance with Einstein's reporting procedures described in the [Non-Discrimination and Anti-Harassment Policy](#).

Any questions about the scope, interpretation or operation of this Whistleblower Policy should be directed to Senior Counsel for Einstein (the "Compliance Officer").

### Reporting Responsibility

All employees and volunteers have an ethical responsibility to report violations or suspected violations and compliance concerns.

### No Retaliation

No employee (including, faculty, staff member, fellow or trainee) or volunteer who, in good faith, reports a policy violation, improper conduct or compliance concerns will be subject to harassment, retaliation or adverse employment consequence as a result of having made a report. An employee who retaliates against someone because that person has reported a violation in good faith is subject to discipline, up to and including termination of employment. This policy is intended to encourage and enable employees and others to raise legitimate concerns.

### Federal Contracts or Grants

All employees (including, faculty, staff member, fellow or trainee) working for contractors, grantees, subcontractors and sub-grantees of federal contractors and grants are legally protected from disclosing information that they reasonably believe is evidence of gross mismanagement of a federal contract or grant, a gross waste of federal funds, an abuse of authority relating to a federal contract or grant, specific danger to public health or safety, or a violation of law, rule or regulations related to a federal contract or grant.

The law provides that employees who make such disclosures may not be discharged, demoted or otherwise discriminated against if disclosure is made to: a member of Congress or a representative of a committee of Congress; an Inspector General; The Government Accountability Office; a federal employee responsible for contract or grant oversight or management at the relevant agency; an authorized official of the Department of Justice or other law enforcement agency; a court or grand jury; or, Einstein's Compliance Officer or Chief Financial Officer.

### Reporting Violations

This policy recommends that individuals share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to submit a report by calling the Compliance Hotline at **1(800) 662-8595** or reporting the matter online at [www.montefiore.alertline.com](http://www.montefiore.alertline.com).

The Compliance Officer is responsible for investigating or supervising the investigation of all reported suspected violations. Once the investigation is complete, the results will be forwarded to Einstein's Audit Committee, and any corrective action will be taken if warranted by the investigation findings.

The Compliance Officer reports compliance activity to the Audit Committee at each regularly scheduled Committee meeting. The Audit Committee may, in its sole discretion, engage outside auditors, counsel or other experts to assist in an investigation and in the analysis of results.

The Compliance Officer will notify the Chief Financial Officer immediately of any reported suspected violations regarding corporate accounting practices, internal controls or auditing ("Accounting Concerns"). Upon receipt, the Chief Financial Officer will promptly evaluate whether a suspected violation is an Accounting Concern and, if so, will promptly determine what professional assistance, if any, is needed to conduct an investigation. The Audit Committee will monitor and review all reported Accounting Concerns.

The Compliance Officer may delegate the investigation of a reported suspected violation, whether an Accounting Concern or otherwise, to one or more Einstein employees, or to any other individual not employed by Einstein. However, the Compliance Officer may not delegate such responsibility to any employee or other individual who is the subject of the suspected violation or if it would compromise the identity of an employee who reported the suspected violation anonymously or the confidentiality of the complaint or resulting investigation. The scope, manner and parameters of any investigation of a reported suspected violation will be determined by the Audit Committee in its sole discretion and Einstein and its employees and volunteers will cooperate as necessary in connection with any investigation.

### Hotline Committee

The Hotline will be managed by an independent third party and reports will be forwarded to Montefiore's Compliance Department. Montefiore's Vice President and Counsel for Compliance will refer all complaints to Einstein's Hotline Committee. The Hotline Committee is responsible for coordinating investigations into all reported complaints and allegations with the Compliance Officer. When an investigation is completed, the results will be forwarded to Einstein's Audit Committee.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of policy, improper conduct or compliance must be acting in good faith and have reasonable grounds for believing the information disclosed indicates that a violation exists. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious offense leading to disciplinary action, up to and including termination of employment.

Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Individuals may submit reports anonymously.

Handling of Reported Violations

The Compliance Officer will acknowledge receipt of each reported suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

**IV. Definitions**

None.

**V. Effective Date**

Effective as of: 26 October 2016.

**VI. Policy Management and Responsibilities**

Einstein's Human Resources department is the Responsible Office under this Policy. Einstein's Associate Dean for Finance and Administration is the Responsible Executive, and Einstein's Vice President for Human Resources and Diversity is the Responsible Officer for the management of this policy.

**VII. Approved (or Revised)**

 \_\_\_\_\_ 21 Feb '18  
Responsible Executive Date  
Ted M. Shivers  
Associate Dean for Finance and Administration