

WHISTLEBLOWER: NON-INTIMIDATION / NON-RETALIATION POLICY

Citizens Options Unlimited Inc. (hereafter referred to as the “Agency”) requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Agency, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Agency can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of the Agency’s code of ethics or suspected violations of law or regulations that govern the Agency’s operations.

No Intimidation, No Retaliation

No director, officer, employee or volunteer of the Agency who in good faith reports any action or suspected action taken by or within the Agency that is illegal, fraudulent, or in violation of any adopted policy of the corporation shall suffer intimidation, harassment, discrimination or other retaliation, or in the case of employees, adverse employment consequence.

If an Agency director, officer, employee or volunteer believes in good faith that he or she has been intimidated and/or retaliated against for initiating a report or complaint, or for participating in any investigation related to such report or complaint, then the Agency director, officer, employee or volunteer should report the alleged intimidation and/or retaliation to his or her supervisor, program director, the Compliance Officer or the Agency’s Compliance Hotline as soon as possible. Any supervisor or program director who receives a report of alleged intimidation and/or retaliation shall immediately notify the Agency’s Corporate Compliance Officer.

A thorough and objective investigation will be conducted of all such reports. Anyone found to have intimidated, threatened retaliation or who have actually retaliated against a whistleblower will be subject to appropriate disciplinary action, up to and including, termination.

Any staff person who knowingly files a false report of misconduct will be subject to disciplinary action, up to and including, termination.

Reporting Procedure

The Agency has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor and/or their program director. If you are not comfortable speaking with your supervisor or program director, or you are not satisfied with your supervisor’s or program director’s response, you are encouraged to communicate with the Corporate Compliance Officer or to report your concern or complaint through the Agency’s Compliance Hotline.

Citizens Options Unlimited, Inc.
Policies and Procedures

Employees, directors, officers, and volunteers are required to report any known or suspected violations of the Corporate Compliance Plan, Code of Conduct, policies and procedures or any of the laws, rules or regulations by which the Agency is governed, to their supervisor, their program director, the Corporate Compliance Officer or through the Agency's Compliance Hotline. Any supervisor or program director who receives a report of a suspected violation shall immediately notify the Agency's Corporate Compliance Officer.

Confidentiality

Any employee, director, officer or volunteer may make reports pursuant to this policy confidentially or anonymously. The Agency has established and maintains a confidential telephone number [516-686-4450] to receive reports of complaints. The identity of a whistleblower will be kept confidential and only disclosed with the consent of the whistleblower, to comply with law or when extraordinary circumstances exist. In the latter case, the decision to disclose the identity of whistleblowers rests with the Agency's Compliance Officer.

All investigations of reported matters will be conducted in a confidential manner so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

Compliance Officer

The Agency's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Compliance Committee (made up of independent directors) on compliance activity relating to such reports.

Handling of Reported Violations

When possible, the Agency's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.