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*Executive Committee

American Friends of Shalva Israel, Inc. Whistleblower Policy

General

American Friends of Shalva Israel, Inc. (the “Organization”) requires its directors, volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the Organization must practice honesty and integrity in fulfilling their responsibilities in compliance with all applicable laws and regulations.

The objectives of the Organization’s Whistleblower Policy are to establish policies and procedures for:

- the submission of concerns regarding financial impropriety or misuse of the Organization’s resources by employees, directors, officers, and other stakeholders of the Organization, on a confidential and anonymous basis;
- the receipt, retention, and treatment of complaints received by the Organization regarding accounting, internal controls, or auditing matters; and
- the protection of directors, volunteers, and employees reporting concerns from retaliatory actions.

Reporting Responsibility

Each director, volunteer, and employee of the Organization has an obligation to report, in accordance with this Whistleblower Policy, (a) financial impropriety and (b) misuse of the Organization’s resources.

Authority of Executive Committee

All reported concerns will be forwarded to the Organization’s officers in accordance with the procedures set forth herein. The officers will be responsible for investigating all reported concerns, and the officers may determine to escalate the investigation of any reported concern to the Executive Committee.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise concerns with within the Organization for investigation and appropriate action. With this goal in mind, no director, volunteer, or employee who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Reporting Concerns

Employees, Directors, and Volunteers

Concerns should be reported in writing to the Organization's Executive Director or to any of the Organization's other officers. Concerns may be delivered anonymously in writing directly to any such person. The officers receiving the report will notify the sender and acknowledge receipt of the concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

The officers shall keep records of all reported concerns, including the investigation and resolution thereof. The officers shall keep the Executive Committee informed of all reported concerns, including those that are resolved by the officers without further escalation to the Executive Committee.

Handling of Reported Violations

The officers receiving a reported concern shall conduct an initial investigation and, if determined in the discretion of the investigating officers, escalate the matter to the Organization's Executive Committee and advise the Executive Committee on a recommended course of action.

All reported concerns that are escalated by an officer to the Executive Committee will be promptly investigated by a duly appointed sub-committee of the Executive Committee, and appropriate corrective action will be recommended to the Executive Committee, if warranted by the investigation. In addition, action taken must include a conclusion and / or follow-up with the complainant for complete closure of the concern.

The Executive Committee, or any sub-committee thereof, has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete closure of the concern.

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates financial impropriety or misuse of the Organization's funds. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, subject in all cases to the Organization's compliance with all applicable reporting requirements under applicable law or pursuant to any order or subpoena of any court or other governmental authority.

Unauthorized disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.