

**Jewish Funders Network
Whistleblower Protection Policy
Adopted by the JFN Board of Directors, December 8, 2008**

General

The Jewish Funders Network (JFN) Code of Ethics (Code) requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and we must comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all JFN directors, officers, and employees to comply with the Code and applicable law and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, or employee of JFN who in good faith reports a violation of the Code or any provision of applicable law shall suffer harassment, retaliation, or adverse employment consequences as a result. An employee who retaliates against someone who has reported a violation of the Code or applicable law in good faith is subject to disciplinary measures, up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution of an ethical violation or other questionable conduct outside the organization.

Reporting Violations

The Code addresses the organization's open-door policy and suggests that employees 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 are not satisfied with your supervisor's response, you are encouraged to speak with the COO, Chair of the Audit Committee, or anyone in management who you are comfortable approaching. Supervisors and managers are required to report suspected violations of the Code or applicable law to the COO, who, in the role of compliance officer, has specific and exclusive responsibility to investigate all reported Code or other legal violations. For suspected fraud, or when you are not satisfied or are uncomfortable with following the organization's open-door policy, please contact the COO directly.

Compliance Officer

The COO serves as the organization's compliance officer and is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his or her discretion, shall advise the CEO and/or JFN board audit committee. The compliance officer has direct access to the audit committee of the board

and is required to report to the audit committee at least annually concerning all compliance activity.

Accounting and Auditing Matters

The audit committee of the board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The compliance officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation of the Code or applicable law must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code or applicable law. 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 disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The compliance officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.