

WHISTLEBLOWER POLICY

Maintaining high standards of conduct and ethics is important to The Negev Foundation. All trustees, committee members, and staff are encouraged to report fraudulent or dishonest conduct (i.e., to act as a “whistleblower”) pursuant to the procedures set forth in the next section.

How to Report

Trustees or committee members should report any reasonable concern about fraudulent or dishonest use or misuse of foundation resources or property to the chair of the Audit Committee or the chair of the Board of Trustees. Employees should report concerns directly to the chief financial officer, the president and CEO, or the chair of the Audit Committee. The names of the persons in these positions and contact information are attached to this document.

Reports should contain enough information to substantiate the concern and allow an appropriate investigation to begin. Reports may be submitted anonymously. Appropriate action will be taken in response to reports. All reports received will be acted upon in confidence when possible given legal requirements and the need to gather facts, conduct an effective investigation, and take necessary corrective action.

Reasonable care will be taken in dealing with suspected misconduct to avoid baseless allegations, premature notice to persons suspected of misconduct, disclosure of suspected misconduct to persons not involved with the investigation and violations of a person’s rights under the law.

Whistleblower Protection

The Negev Foundation will use its best efforts to protect whistleblowers against retaliation. Whistleblower complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Whistleblowers who believe that they have been retaliated against for reporting an activity, which that person believes to be fraudulent or dishonest, may file a written complaint about such retaliation with the chief financial officer, the president and CEO or the chair of the Audit Committee. Any complaint of retaliation, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or reduced salary or wages, will be promptly investigated and corrective action taken, where allegations are substantiated. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties based on valid performance-related factors, nor is it intended to preclude disciplinary action against individuals who report baseless allegations.

Contact Information

Contact information for the chief financial officer and for the president and CEO is available online at www.negev.org, or by calling 216.691.9997. Contact information for the chair of the Audit Committee is available upon request.