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## Policy on Third-Party Reports of Misconduct or Misuse of Funds

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The Segal Family Foundation, Inc. (the "Foundation") is committed to lawful and ethical behavior in all of its activities and in the use of its funds. The Foundation requires directors, officers, employees, volunteers, and consultants ("Foundation Persons") to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Foundation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. In addition, the Foundation seeks to ensure that its funds are used for the purposes for which they were intended. Grantees, contractors, vendors, and other third parties who do business with the Foundation should report any concerns about the legality or propriety of the actions of Foundation Persons or about the use of Foundation funds.

### **Reporting Procedure**

The Foundation has an open door policy. Any person may report to the Foundation a good faith concern regarding the legality or propriety of the actions of Foundation Persons or about the use of Foundation funds by contacting the Foundation's Executive Director. Reports to the Foundation can be made verbally or in writing, in person, or anonymously.

Communications to the Executive Director should be directed to: tel: +1 (908) 279-7882; email: [compliance@segalfamilyfoundation.org](mailto:compliance@segalfamilyfoundation.org); or mail: 67 Mountain Boulevard, Suite 201, Warren, NJ 07059 attn: Executive Director, Segal Family Foundation.

### **Handling of Reported Violations**

The Foundation's Executive Director shall be responsible for ensuring that all complaints are investigated. The Foundation will investigate these reports and take corrective action as it deems necessary. If confidentiality is requested, the Foundation will protect the identity of the person reporting a concern to the greatest extent possible, consistent with the need to conduct an adequate investigation. Accordingly, the Foundation cannot promise complete confidentiality. The Executive Director will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Board of Directors on such activity.

### **Compliance Officer**

The Foundation may, from time to time, name an individual other than the Executive Director to act as Compliance Officer. The Compliance Officer may be a board member or a third party designated by the organization to receive, investigate, and respond to complaints.

**Distribution**

A copy of this Policy will be distributed to all Foundation Persons and will be posted on the Foundation's website.

The Foundation reserves the right to amend and/or supplement this Policy at any time.