

Employee Protection: Whistleblower Policy

The Alzheimers Disease And Related Disorders, New York City, Inc. (“ADRDC NYC”) is committed to promoting a professional work environment through strict legal and ethical compliance in all of its activities. Accordingly, ADRDC NYC requires its directors, officers, employees, and volunteers to observe and uphold high standards of business and personal ethics in the conduct of their duties and to fulfill his or her responsibilities in compliance with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable all employees and agents to raise any serious concerns with ADRDC NYC for proper investigation and corrective action, if necessary. It is the responsibility of all directors, officers, employees and volunteers to report, in good faith, any reasonable suspicion of unethical behavior, violation of applicable laws or regulations, or other forms of serious misconduct.

Reporting Procedure

ADRDC NYC encourages an open door policy. If at any time an employee or agent has in good faith concerns regarding a violation or suspected violation of ethical standards, applicable laws or regulations, or other forms of serious misconduct by any employee or agent as the action relates to ADRDC NYC activities, or such employee or agent believes that a specific action is required for ADRDC NYC to be in compliance with applicable legal or ethical standards, the employee or agent is expected to immediately report such information to ADRDC NYC's President and CEO, Lou-Ellen Barkan, who will report any concerns as soon as practicable to the Audit Committee. All reports will be promptly documented, investigated, and appropriate corrective action will be taken if warranted by the investigation.

Serious misconduct has an adverse impact on the organization and includes such activities as:

- Theft;
- Financial reporting that is intentionally misleading;
- Improper or undocumented financial transactions;
- Improper destruction of records;
- Improper use of assets;
- Violations of ADRDC NYC's conflict-of-interest policy;
- Any other improper occurrences regarding financial procedure or reporting.

If an employee or agent is not comfortable reporting the information to ADRDC NYC's President and CEO, or if an employee or agent feels that the issue has not been properly addressed, the employee or agent can contact the organization's “Ombudsperson,” Board Member Susan V. Kayser, by telephone at (212) 692-1058 or by email at svkayser@duanemorris.com. The Ombudsperson shall advise the Audit Committee of all reported concerns.

Protection from Retaliation

No director, officer, employee or volunteer of ADRDC NYC who in good faith reports any action or suspected action taken by or within ADRDC NYC that is illegal, fraudulent or in violation of

any adopted ADRD NYC policy shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequence. Any individual who retaliates against such an employee or agent is subject to discipline up to and including termination of employment.

Good Faith

Any employee or agent reporting a violation or suspected violation must be acting in good faith and have reasonable grounds for believing that the information disclosed indicates a violation of ADRD NYC's policy. ADRD NYC will treat as a serious disciplinary offense any unsubstantiated allegations that were knowingly false and/or made with malicious intent.

Confidentiality

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

Distribution

ADRD NYC shall distribute a copy of this Whistleblower Policy to its directors, officers, employees, volunteers and agents.