

ARGUS COMMUNITY, INC.

Whistle Blower Policy 2015

The Board of Directors of Argus Community, Inc. has adopted the following policy governing “Whistle Blowers” for all Directors of the Board, Officers, employees and volunteers of the corporation.

POLICY

Argus Community, Inc. (the Corporation) requires all directors, officers, employees and volunteers to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. It is expected that representatives and employees of the Corporation will practice honesty and integrity in fulfilling their responsibilities and that they shall comply with all applicable laws, regulations and corporate policies of the Corporation. In this spirit, the Corporation supports and encourages the directors, officers, employees and volunteers to identify any instances in which these standards may be compromised.

All directors, officers, employees and volunteers are covered under this Policy and it is their responsibility to comply with this Policy and to report Suspected Violations in accordance with the procedures set forth below. The individuals involved in such Suspected Violations may be directors, officers, employees, volunteers, auditors, vendors or other third parties.

This Policy is intended to complement the Compliance Plan and the compliance manuals already in practice for the Medicaid-funded programs operated by Argus Community, Inc.

A copy of this Policy shall be distributed to all directors, officers and employees of the Corporation and to all volunteers who provide substantial services to the Corporation.

PURPOSE

This Whistler Blower Policy (the Policy) has been established to provide a means for directors officer, employees and volunteers of the Corporation to raise concerns about behavior by, or within the Corporation, that is, or appears to be, illegal, fraudulent, dishonest, unethical or in violation of any adopted policy of the Corporation (a “Suspected Violation”). A “Whistle Blower” is the director, officer, employee or volunteer reporting such Suspected Violation pursuant to this Policy.

Examples of Suspected Violations that should be reported under this Policy include, but not limited to, violations of federal, state or local law or regulations; fraudulent financial reporting or actions that may lead to such fraudulent reporting; providing false information to, or withholding material information from, the Corporation’s auditors; destroying, altering, concealing or falsifying a document, or attempting to do so with the intent to impair the document’s availability for use in an official proceeding. Actions which have been taken by others that the Whistle Blower believes to be subject to reporting, and actions which have not been taken, and

which the Whistle Blower believes are required to be taken to be in compliance with laws or corporate policies adopted by the Corporation are also with the scope of this Policy.

COMPLIANCE OFFICER

A Compliance Officer shall be appointed to handle reported violations and oversee the resolution of all reported complaints concerning Suspected Violations. The Compliance Officer will report directly to the Board of Directors under this Policy.

The Compliance Officer for Argus Community Inc. is:

Jennifer Kaminsky
Executive Oversight Director for Operations
760 E. 160th St.
Bronx, NY 10456
JKaminsky@arguscommunity.org
Tele 718-401-5753
Fax 718-401-0530

PROCEDURES FOR REPORTING OF SUSPECTED VIOLATIONS BY WHISTLE BLOWERS.

A Whistleblower should direct all reports, either in written or oral form, to the Compliance Officer appointed by the Board of Directors. If the Compliance Officer is the subject of the Suspected Violation or a Whistleblower is not comfortable reporting a complaint concerning a Suspected Violation to the Compliance Officer or is unsatisfied with the response, the Whistleblower is encouraged to instead speak with his or her supervisor or anyone in management with whom he or she is comfortable. In such case, the manager to whom such Suspected Violation is reported shall in turn report such Suspected Violation to the Compliance Officer, unless the Compliance Officer is the subject of the complaint, in which case the manager shall submit the report to the Audit Committee. If the Compliance Officer is the subject of the complaint, the Audit Committee shall designate someone to act in the place of the Compliance Officer and all references to the Compliance Officer in this Policy with respect to such complaint shall be applicable to such designee. Such report shall include a statement as to whether such Suspected Violation was reported first to the Compliance Officer; if it was not, the report shall indicate why the Suspected Violation was not reported to the Compliance Officer.

Unless the complaint is submitted anonymously or there are overriding legal or public interest concerns, the Whistleblower generally will be provided with an acknowledgement of receipt of his or her complaint within ten business days.

Consistent with the need to conduct a fair and adequate investigation, the identity of the Whistle Blower will be protected to the greatest extent feasible.

All complaints will be promptly investigated by or under the direction of the Compliance Officer, and appropriate corrective action will be taken if warranted by the investigation. The Compliance Officer may resolve any complaint without consulting others, discuss such complaint with the Audit Committee, any other Board committee or the Board of the Corporations before taking action or refer the matter to the Audit Committee or the full Board for action, depending on the Compliance Officer's determination of the seriousness or severity of the complaint.

The Audit Committee also shall have authority to investigate a Suspected Violation raised in accordance with this policy if it deems it appropriate and, in consultation with the Board if necessary, may retain outside legal counsel, accountants, private investigators, or any other resource that the Audit Committee reasonably believes is necessary to conduct a full and complete investigation of the allegations.

The Compliance Officer shall provide to the Audit Committee annually a written report identifying all complaints reported under this Policy during the year or indicating that no such complaints were reported. Records of all complaints shall be maintained in accordance with the Corporation's document retention policies.

Following investigation, the Corporation, which is responsible for the alleged violation, will take appropriate remedial and disciplinary action as it deems justified by the circumstances, including, but not limited to, terminating employment, board membership or volunteer status, seeking restitution, removal from office, or criminal prosecution.

Anyone filing a complaint concerning a Suspected Violation must have reasonable grounds for believing the information disclosed may indicate a Suspected Violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or with knowledge of their falsehood will be viewed as a serious disciplinary offense.

A Whistleblower's right to protection under this Policy does not provide him or her with immunity for participating or being complicit in the Suspected Violation that is the subject of the complaint or ensuing investigations.