

responsibilities to Yeshiva University with integrity and in full compliance with applicable laws and regulations and Yeshiva University's own operating policies and procedures. To that end, Yeshiva University has adopted this Policy to protect Protected Persons from Retaliatory Action for engaging in Protected Activity (as such terms are defined below).

It is the policy of Yeshiva University to encourage Protected Persons to engage in Protected Activity.

Protected Persons and Protected Activity

For purposes of this Policy, Protected Persons are defined as all officers, faculty, employees, former employees, and independent contractors of Yeshiva University.

A Protected Person is deemed to be engaged in Protected Activity, regardless of whether or not the following:

- (a) discloses, or threatens to disclose, to a supervisor or to a public body an activity,
- (b) provides information to, or testifies before, any public body conducting an investigation, hearing, or inquiry into any such activity, policy, or practice by Yeshiva University; or
- (c) objects to, or refuses to participate in, any such activity, policy, or practice.

\$ law, rule, or regulation · (i) Only duly enacted federal, state, or local statute, ordinance, or executive order; (ii) any rule or regulation promulgated pursuant to such statute, ordinance, or executive order; or (iii) any judicial or administrative decision, ruling, or order.

\$ Supervisor · Individual within Yeshiva University who has the authority to direct and control the work performance of the Protected Person, or who has managerial authority to take corrective action regarding the violation of the law, rule, or regulation of which the Protected Person complains.

\$ public body · (i) Any local governmental body, or any member or employee thereof; (ii) any federal, state, or local

court, or any member or employee thereof, or any grand or petit jury; (iii) any federal, state, or local regulatory, administrative, or public agency or authority, or instrumentality thereof; (iv) any federal, state, or local law enforcement agency, prosecutorial office, or police or peace

other individual, including persons not employed by Yeshiva University, selected by the IA Director; provided that the IA Director may not delegate such responsibility to any employee or other individual who is the subject of the reported activity, or in a manner that would compromise either the identity of an employee who made the report anonymously or the confidentiality of the complaint or resulting investigation. Notwithstanding anything herein to the contrary, the scope, manner, and parameters of any investigation shall be determined by the General Counsel in its sole discretion, and Yeshiva University and its employees shall cooperate as necessary in connection with any such investigation.

Acting in Good Faith

Anyone reporting an activity, policy, or practice of Yeshiva University that the individual reasonably believes is in violation of the law, rule, or regulation, or that the individual reasonably believes poses a substantial and specific danger to the public health or safety, must be acting in good faith and have reasonable grounds for believing the information disclosed indicates that a

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Distribution

Yeshiva University will distribute a copy of this Policy to all officers, faculty, employees, and independent contractors who provide substantial services to Yeshiva University, and post a copy on its website.

Updated March 2022