



MENORAH PARK

CORPORATE COMPLIANCE

Menorah Park's Commitment to Compliance

Jewish Home of Central New York, Inc., Menorah Park Group Residences, Inc., and Syracuse Jewish Family Services, Inc. (collectively, "Menorah Park") are committed to upholding all Federal and State laws, regulations, and ethical standards. To this end, Menorah Park has adopted a Corporate Compliance Program to promote Menorah Park's compliance with all applicable Federal and State laws, regulations, and ethical standards. Menorah Park's Compliance Program, Compliance Plan, and associated policies and procedures provide guidance to all persons who are affected by Menorah Park's compliance risk areas, including Menorah Park's employees, contractors, and Board of Directors members on how to conduct themselves when working for Menorah Park. The goals of Menorah Park's Compliance Program are to:

1. Prevent fraud, waste, abuse, and other improper or unethical conduct;
2. Detect any improper or unethical conduct at an early stage before it creates a substantial risk of liability for Menorah Park; and
3. Respond swiftly to compliance problems through investigation, disciplinary, and corrective action.

To receive additional information on Menorah Park's Compliance Program, please contact Sarah Grigorita, Compliance Officer, at sgrigorita@menorahparkofcny.com or (315) 446-9111 ext. 133.

Menorah Park's Standards of Conduct

Menorah Park recognizes that operating in an ethical and legal manner is not only an obligation of Menorah Park, but is an obligation of each individual providing services on Menorah Park's behalf. Menorah Park's Standards of Conduct set forth the basic principles that guide Menorah Park's decisions and actions. All employees, contractors, and Board members of Menorah Park are required to comply with Menorah Park's Standards of Conduct in carrying out their duties.

To receive additional information on Menorah Park's Standards of Conduct, please contact Sarah Grigorita, Compliance Officer, at sgrigorita@menorahparkofcny.com or (315) 446-9111 ext. 133.



Reporting Compliance Concerns

If you believe that a compliance violation may have occurred, you should report the issue immediately using any of the following reporting methods:

1. Make a report to Menorah Park's Compliance Hotline at (315) 446-9111 ext. 421;
2. Report to Menorah Park's Compliance Officer, Sarah Grigorita, by telephone (315-446-9111 ext. 133) or email (sgrigorita@menorahparkofcny.com);
3. Report to the Compliance Officer, Sarah Grigorita, in writing by mail to Attn: Compliance Officer, Menorah Park of CNY, 4101 E Genesee Street, Syracuse, New York 13214;
4. Report in writing using the Compliance Dropbox located at the Human Resources office;
5. Report to a member of Menorah Park's Compliance Committee; or
6. Report to a Menorah Park Supervisor, Board member, or the CEO.

Anonymous reports of compliance issues can be made using Menorah Park's Compliance Hotline or by making a report in writing by mail to the Compliance Officer. All reports of potential compliance issues will be investigated thoroughly and in a timely manner.

Menorah Park will ensure that the confidentiality of persons reporting compliance issues is maintained unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by the New York State Attorney General's Medicaid Fraud Control Unit, the New York State Office of the Medicaid Inspector General, or law enforcement, or disclosure is required during a legal proceeding. All persons reporting compliance issues will be protected from non-intimidation and non-retaliation pursuant to Menorah Park's Non-Retaliation and Non-Intimidation Policy.

The above reporting methods may also be used to ask compliance-related questions and to communicate directly with Menorah Park's Compliance Officer.