

St. Clare Management, Inc.
Whistleblower Policy

Approved by the Board of Directors
Oct. 22, 2009

St. Clare Management has a responsibility for the stewardship of resources that enables it to pursue its mission. St. Clare Management is committed to compliance with the laws and regulations. Laws, regulations, policies, and procedures strengthen and promote ethical practices and ethical treatment to the individuals we serve, the employees who carry out our mission, the community that supports us, and those who conduct business with our organization.

St. Clare Management's internal controls and operating procedures are intended to detect, prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities. Intentional and unintentional violations of laws, regulations, policies, and procedures may occur. St. Clare Management has a responsibility to investigate and report to the appropriate party allegations of suspected improper activities and the actions taken by the organization.

It is the intent of St. Clare Management to adhere to all laws and regulations that apply to the organization. The underlying purpose of the policy is to support the organization's goals of legal and regulatory compliance. The support of all employees is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy or practice to the attention of the **Chairman of the Board for St. Clare Management** or the **Director of Sponsorship Services for the School Sisters of St. Francis** at 1515 S. Layton Blvd, Milwaukee WI. 53215, and provides a reasonable opportunity to investigate and correct the alleged unlawful activity.

St. Clare Management will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of St. Clare Management, or of another individual or entity with whom St. Clare Management has a business relationship which is based on a reasonable belief that the practice is in violation of law or a clear mandate of public policy.

St. Clare Management will not retaliate against an employee who discloses or threatens to disclose to a supervisor or a public body any activity, policy or practice of St. Clare Management that the employee reasonably believes is in violation of a law or a rule or a regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning health, safety, welfare or protection of the environment.

My signature below indicates my receipt and understanding of this Policy. I also verify that I have been provided with an opportunity to ask questions about the Policy.

Employee Signature and Date