

**WHISTLEBLOWER POLICY  
OF  
CHARLES T. SITRIN NETWORK OF HOMES & SERVICES, INC. AND ITS AFFILIATES**

Article I

Purpose

The purpose of this Whistleblower Policy (“Policy”) is to protect from retaliation persons who report, in good faith, suspected improper conduct. This Policy is adopted by and on behalf of Charles T. Sitrin Network of Homes & Services, Inc. (“Network”) and its affiliates (“Sitrin Affiliates” and, together with Network, “Sitrin”). This policy is intended to supplement but not replace any applicable federal and/or state laws governing whistleblower protection.

Article II

Definitions

1. Affiliate

A corporation or other entity controlled by, in control of, or under common control with a corporation.

2. Sitrin Affiliates

The Sitrin affiliates Charles T. Sitrin Health Care Center, Inc., Sitrin Child Day Care Services, Inc., Sitrin Foundation, Inc., Gan Kavod, Inc., Cedarbrook Village, Incorporated and Georgian Court Estates Senior Housing Corporation.

3. Improper Conduct

Any action or suspected action taken by or within Sitrin that is illegal, fraudulent, in violation of federal and state health care programs, or in violation of any adopted policy of Sitrin, including, but not limited to, the Standards of Conduct contained in Network’s Corporate Compliance Manual.

Article III

Covered Persons

Covered persons protected by this Policy are any director, officer, employee, professional staff member, or volunteer participating in a formal volunteer program of a Sitrin Affiliate (“Covered Persons”).

Article IV

Procedure

1. Reporting of Violations

The reporting of actual or suspected Improper Conduct is addressed in the “Reporting Requirements” section of Network’s Corporate Compliance Manual and the attached Appendix to this Policy.

2. Confidentiality

Confidentiality protections are addressed in the “Reporting Requirements” section of Network’s Corporate Compliance Manual and the Appendix.

3. Maintenance of Reports

Reports of Improper Conduct will be maintained by Network’s Corporate Compliance Officer for the latter of a period of six (6) years after the completion of Network’s investigation of reported Improper Conduct or a period of six (6) years after the completion of a governmental investigation, if any, of the reported Improper Conduct.

Article V

Non-Retaliation/Non-Intimidation

No Covered Person who, in good faith, makes a report of Improper Conduct or who, in good faith, participates in any internal or governmental investigation of a report of Improper Conduct will be subject to intimidation, harassment, discrimination or other means of retaliation and, with respect to employees, adverse employment consequences.

Article VI

Policy Administrator

Network’s Corporate Compliance Officer shall be responsible for administering this Policy and will report, with respect to this Policy, directly to Network’s Audit Committee.

Article VII

Distribution

A copy of this policy will be distributed to all current Covered Persons and will be distributed to new Covered Persons during their initial orientation with Sitrin. This policy will also be conspicuously posted on Sitrin’s website and intranet.

Article VIII

Violation of Policy

A violation of this Policy will result in disciplinary action, including, but not limited to: (1) for a director or officer, up to removal from the Board of Directors and/or removal from office; (2) for an employee, up to termination of employment; (3) for a professional staff member, up to termination of staff privileges; and (4) for a volunteer, up to termination of volunteer privileges.

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