

# **Conscientious Employee Protection Act**

**“Whistleblower Act”**

## **Employer retaliatory action; protected employee actions.**

The law prohibits an employer from taking any retaliatory action against an employee because the employee does any of the following:

- a. Discloses, or threatens to disclose, to a supervisor or to a public body an activity, policy or practice of the employer or another employer, with whom there is a business relationship, that the employee reasonably believes is in violation of a law, or a rule or regulation issued under the law, or, in the case of an employee who is a licensed or certified health care professional, reasonably believes constitutes improper quality of patient care;
- b. Provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into any violation of law, or a rule or regulation issued under the law by the employer or another employer, with whom there is a business relationship, or, in the case of an employee who is a licensed or certified health care professional, provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into quality of patient care; or
- c. Objects to, or refuses to participate in, any activity, policy or practice which the employee reasonably believes:
  - (1) is in violation of a law, or a rule or regulation issued under the law or, if the employee is a licensed or certified health care professional, constitutes improper quality of patient care;
  - (2) is fraudulent or criminal; or
  - (3) is incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment. *N.j.S.A. 34:19-3.*

Your employer has designated the following contact person to answer your questions or provide additional information regarding your rights and responsibilities under this act:

**Name:** Renie Wilman  
**Address:** 505 Main Street  
**Telephone #:** (201) 487-1500 X 142

**This notice must be conspicuously displayed.**

First Real Estate Investment Trust of New Jersey (“FREIT”) has established a **Whistleblower Policy**. This policy is in addition to the **Conscientious Employee Protection Act** of the State of NJ that is in effect.

As a guiding principal, FREIT requires that all employees observe high standards of business practices and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of FREIT, we are to practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

To insure that the above practices and personal ethics are being observed at all times, FREIT’s **Whistleblower Policy** requires that all officers and employees report violations or suspected violations. No officer or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequences.

# WHISTLEBLOWER POLICY

## General

As used herein "FREIT" refers to the First Real Estate Investment Trust of New Jersey. FREIT requires all officers and employees to observe high standards of business practices and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of FREIT, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## Reporting Responsibility

It is the responsibility of all officers and employees to comply with the policy of observing high standards of business practices and personal ethics described above, and to report violations or suspected violations in accordance with this Whistleblower Policy.

## No Retaliation

No officer or employee who in good faith reports a violation of the high standards of business practices and personal ethics we demand shall suffer harassment, retaliation or adverse employment consequence. The employee is also protected under the NJ Conscientious Employee Protection Act. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within FREIT prior to seeking resolution outside FREIT.

## Reporting Violations

The FREIT Whistleblower Policy is an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with FREIT's Compliance Officer (see below), or anyone in management whom you are comfortable in approaching. Supervisors and management are required to report suspected violations of what are generally considered high ethics and good conduct to the Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with FREIT's open door policy, individuals should contact the Compliance Officer directly.

## Compliance Officer

The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning breaches and violations of high standards of business practices and personal ethics and, at his discretion, shall advise the the Chairman of the Audit Committee of FREIT. The Compliance Officer has direct access to FREIT's audit committee and FREIT's board of trustees and is required to report to the audit committee at least annually on compliance activity.

## Accounting and Auditing Matters

The Compliance Officer shall report all concerns or complaints regarding corporate accounting practices, internal controls or auditing to the Chairman of FREIT's audit committee, and work with the audit committee until the matter is resolved.

## Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violations of high standards of business practices and personal ethics must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

**COMPLIANCE OFFICER – Renie Wilman, (201) 487-1500 X 142**

I have received a copy of this Whistleblower Policy.

By: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_