

CATHOLIC CHARITIES OF LONG ISLAND
COMPLIANCE PROGRAM POLICIES AND PROCEDURES

SUBJECT: Modification and Revision of Compliance Policies and Procedures

APPROVED BY: Julia Bruno, Acting Compliance Officer

EFFECTIVE DATE: April 12, 2023

REVISED:

POLICY

On at least an annual basis, the Compliance Officer will review and evaluate the effectiveness of the operation of the Compliance Program with the assistance of internal and external advisors, as necessary. Based on such reviews, the Compliance Officer will implement appropriate modifications of, or revisions to, compliance policies and procedures and/or other aspects of Agency's Compliance Program.

PROCEDURE

1. Suggestions for document changes may be forwarded to the Compliance Officer and are welcomed from any source. They will be scheduled to be discussed at the March Compliance Committee meeting.
2. If any change requires immediate action as determined by the Compliance Officer, the Compliance Officer, upon discussion with CEO as necessary, will implement the change as quickly as possible.
3. Each January, the Compliance Officer will remind the members of the Compliance Committee to review the Compliance Manual, the Compliance Training and Compliance Policies and Procedures for accuracy and to make recommendations for improvement, wherever possible.
4. These suggested modifications will be reviewed at the March Compliance Committee meeting.
5. When there is a consensus of opinion obtained by the Compliance Committee for the suggested changes, the Compliance Officer will revise the documents as needed, and oversee the implementation of the changes.