MUST BE POSTED IN A CONSPICUOUS LOCATION OR ON THE ASSOCIATION'S WEBSITE

WHISTLEBLOWER POLICY

OF

NEW YORK STATE RANGER SCHOOL ALUMNI ASSOCIATION, INC.

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1. PURPOSE. The purpose of this whistleblower policy (the "**Policy**") is to ensure that no director, officer, Key Person, employee or volunteer of **NEW YORK STATE RANGER SCHOOL ALUMNI ASSOCIATION, INC.** (the "**Association**") who in Good Faith reports any action or suspected action taken by or within the Association that is illegal, fraudulent, corrupt, criminal or in violation of any adopted policy of the Association ("**Misconduct**") shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequence.

2. DEFINITIONS.

(a) ***Good Faith***. Information concerning potential Misconduct is disclosed in "good faith" when the individual making the disclosure reasonably believes such information to be true and reasonably believes that it constitutes potential Misconduct.

(b) ***Association Agent***. All directors, officers, Key Persons (as defined in Section 102(25) of the Not-for-Profit Corporation Law), employees, volunteers, staff and any other person who provides services to the Association, whether full-time, part-time, employed pursuant to contract, employed on probation and/or temporary employees.

(c) ***Whistleblower.*** Any Association Agent who in Good Faith discloses information concerning Misconduct by another Association Agent or concerning the business of the Association itself.

(d) ***Personnel Action***. Any action affecting compensation, appointment, promotion, transfer, assignment, reassignment, reinstatement or evaluation of performance.

3. PROCEDURES. All Association Agents who discover or have knowledge of Misconduct or potential Misconduct concerning other Association Agents, a person having any business dealings with the Association, or the Association itself, shall report such activity in accordance with the following procedures:

(a) The Association Agent shall disclose any information concerning Misconduct either orally or in a written report to: (i) his or her supervisor; (ii) the Association's Ethics Officer, as defined herein; or (iii) the Association's legal counsel. "**Ethics Officer**" means a director of the Association and member of the Association's Audit Committee designated to administer this Policy.

(b) All Association Agents who discover or have knowledge of Misconduct shall report such Misconduct in a prompt and timely manner.

(c) The individual to whom the potential Misconduct is reported, if not the Ethics Officer, shall acknowledge receipt of the reported Misconduct or suspected Misconduct and shall report such Misconduct to the Ethics Officer. The Ethics Officer shall

then report to the Executive Committee of the Association or such other committee of authorized by the Board of Directors any reports submitted pursuant to Section 3(b) hereof.

(d) Any report of Misconduct shall be investigated and handled in a timely and reasonable manner, which may include referring such information to an appropriate law enforcement agency where applicable.

(e) Should an Association Agent believe in Good Faith that disclosing information within the Association pursuant to Section 3(a) above would likely subject him or her to adverse Personnel Action or be wholly ineffective, the Association Agent may instead disclose the information to the President of **Alumni Association of State University of New York College of Environmental Science and Forestry, Inc.**

4. **NO RETALIATION OR INTERFERENCE.** No Association Agent shall retaliate against any Whistleblower for the disclosure of potential or suspected Misconduct, whether through threat, coercion, or abuse of authority; and, no Association Agent shall interfere with the right of any other Association Agent by any improper means aimed at deterring disclosure of potential or suspected Misconduct. Any attempts at retaliation or interference are strictly prohibited and:

(a) No Association Agent who in Good Faith discloses potential violations of the Association's internal policies or other instances of potential Misconduct shall suffer harassment, retaliation or adverse Personnel Action.

(b) All allegations of retaliation against a Whistleblower or interference with an individual seeking to disclose potential Misconduct will be thoroughly investigated by the Association.

(c) Any Association Agent who retaliates against or had attempted to interfere with any individual for having in Good Faith disclosed potential violations of the Association's internal policies or other instances of potential Misconduct is subject to discipline, which may include termination of employment.

(d) Any allegation of retaliation or interference will be taken and treated seriously and irrespective of the outcome of the initial complaint, will be treated as a separate matter.

5. **REPORTING REQUIREMENTS**. A copy of the Policy shall be distributed to all Association Agents by the Ethics Officer.

6. **CONFIDENTIALITY**. The identity of the Whistleblower and the substance of his or her allegations shall be kept confidential to the best extent possible, consistent with the need to conduct an adequate investigation.

7. **OTHER LEGAL RIGHTS NOT IMPAIRED**. This Policy is not intended to limit, diminish or impair any other rights or remedies that an individual may have under the laws of the State of New York with respect to disclosing potential Misconduct free from retaliation or adverse Personnel Action.

Adopted: _____, *2019*