

Adoption Date: 12-6-2019

Binghamton Auxiliary Services Corporation Whistleblower Policy

PURPOSE: The Binghamton Auxiliary Services Corporation (BASC) requires all staff, board members, and volunteers to observe high standards of professional and personal ethics in the conduct of the activities of the Corporation and within their duties and responsibilities. As representatives of the Corporation, we must practice honesty and integrity. In addition, staff members employed by either the State University of New York or the Research Foundation must follow the policies and procedures adopted by these employers.

SCOPE: All communications received under this Policy will be treated in a confidential manner, except to the extent it is necessary to conduct a complete and fair investigation or in a review of Corporation operations by the State University of New York, the Board of Directors, the Audit Committee, the Corporation's independent public accountants or legal counsel. A copy of this policy will be disseminated to all directors, officers, employees, and volunteers who provide substantial services to the Corporation.


POLICY: No staff member, board member or volunteer who reports, in good faith, a violation or suspected violation under this Whistleblower policy shall suffer any type of harassment, retaliation or adverse employment consequences. Retaliation in any form will not be tolerated. A person who retaliates against a person, who in good faith has reported a violation, will be subject to discipline up to and including termination of board membership or volunteer staff membership or in the case of a staff member, will be subject to the policies of the State University of New York. Anyone filing a complaint concerning a violation or suspected violation 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.

The Corporation has an open-door policy and it is suggested that staff, board members and volunteers share their questions, concerns, suggestions, or complaints with the appropriate person who can address them properly. In most cases, the staff member or volunteer will report to the supervisor or staff liaison. A board member should report to the chair of the Audit Committee or the Executive Director of the Corporation. If you are an employee of the Corporation then you may also refer to the policies of the Corporation.

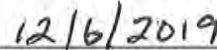
The Executive Director of the Corporation will be the Corporation's Compliance Officer. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations except in cases where the Compliance Officer is the subject of, or otherwise involved in, the reported violation, in which case a member of the Audit Committee shall be appointed to investigate and resolve such matter. The person who is the subject of a complaint may not be present at or participate in Board or committee deliberations or vote on the matter relating to that complaint; provided that this sentence shall not prohibit the Board from requesting that the person who is subject to the complaint present information as background or answer questions at a Board meeting prior to the commencement of deliberations or voting related thereto.

The Compliance Officer is required to report to the Audit Committee at least annually, the compliance activity of the Corporation. The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the committee until the matter is resolved. 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.

Portions of this policy are copyrighted by: Copyright 2004, National Council of Nonprofit Associations, www.ncna.org.



Cornelia D. Mead
Secretary



Date