



728 Madison Ave, Suite 105
Albany, NY 12208
518-250-6833
<http://pinehillsna.org>

POLICY: Whistleblower Protection

Policy Number: 1.3

Adopted: 11/18/2019

— Whistleblower Protection —

To help insure an ethical environment, and one free of conflicts of interest, the Pine Hills Neighborhood Association (the Association) shall endeavor to protect any member, officer, Board member, volunteer or member of the public from intimidation, bullying, harassment, discrimination or other forms of retaliation on the part of the Association, or any of its Board members, officers, or volunteers, as a consequence of the good-faith filing of a report relative to possible violations of any statute, regulation, applicable ethical standard or Association policies or procedures.

Reporting Responsibility

It is the responsibility of all directors, officers, members and volunteers to comply with this policy, the Association's Code of Ethics, and to report violations or suspected violations in accordance with this Whistleblower Protection policy.

No Retaliation

No director, officer, member or volunteer who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. A director who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of their employment. This Whistleblower Policy is intended to encourage and enable individuals to raise serious concerns within the Association prior to seeking resolution outside the Association.

Procedure for Reporting Violations

Whistleblower protection is a component of the Association's open door approach to its mission, and it is suggested that members, volunteers and others share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an Officer of the Association is in the best position to address an area of concern. However, if a reporting individual is not comfortable speaking with an officer or is not satisfied with their response, such person is encouraged to speak with whomever they are comfortable in approaching.

Compliance Officer

The Association's President is the Compliance Officer, except if in a case where the President's conduct is at issue, where the Secretary or another member of the Executive Committee may serve. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code, and has specific and exclusive responsibility to investigate all reported violations. The Compliance Officer is required to report to the Board at least annually on compliance activity.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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 two weeks. All reports will be promptly evaluated and investigated if necessary, and appropriate corrective action will be taken if warranted. The Compliance Officer may request support from outside officials or agencies if necessary. Where appropriate, violations of law or regulations should be referred to appropriate agencies by the Compliance Officer, in consultation with the Association's Executive Committee.

Publication

This policy shall be promulgated and distributed as appropriate to Officers, Board members, volunteers and others who providing services or otherwise engaged in activities with the Association.