



# Whistleblower Policy

## Policy Information

Date Established: May 2019

Date Last Updated: September 4, 2024

Category: Student Association

NO DIRECTOR, OFFICER, KEY PERSON, EMPLOYEE OR VOLUNTEER OF A CORPORATION WHO IN GOOD FAITH REPORTS ANY ACTION OR SUSPECTED ACTION TAKEN BY OR WITHIN THE CORPORATION THAT IS ILLEGAL, FRAUDULENT OR IN VIOLATION OF ANY ADOPTED POLICY OF THE CORPORATION SHALL SUFFER INTIMIDATION, HARASSMENT, DISCRIMINATION OR OTHER RETALIATION OR, IN THE CASE OF EMPLOYEES, ADVERSE EMPLOYMENT CONSEQUENCE.

This Whistleblower Policy is not an employment contract, nor does it change the fact that any employee of the University at Buffalo Student Association Inc. (the "Corporation") is an employee at will.

## Procedures for the Reporting of Violations or Suspected Violations of Laws or Corporate Policies:

1. Any violation or suspected violation of a law or corporate policy shall be reported (orally or in writing) to the Corporation's President and to the Corporation's Operations Director at 350 Student Union, UB North Campus, Buffalo, NY 14260, (716) 645-2950.
2. If the President is the subject of such report, the report shall be made to the Chairperson of the Board of Directors instead of the President. If the Operations Director is the subject of such report, the report shall be made to the Administrative Director instead of the Operations Director.
3. It is required that an employee, officer or director of the Corporation be designated to administer the Whistleblower Policy and to report to the Audit Committee or other committee of independent directors or, if there are no such committees, to the Board. The President of the Corporation is so designated to administer the Whistleblower Policy and to report to the appropriate body listed above. Directors who are employees may not participate in any board or committee deliberations or voting relating to administration of the whistleblower policy.
4. All reports received will be treated confidentially or anonymously, as applicable, to the extent reasonable and practicable under the circumstances, if and to the extent allowed for under law and State University of New York at Buffalo policy(ies).
5. The person who is the subject of a whistleblower complaint shall not be present at or participate in board or committee deliberations or vote on the matter relating to such complaint, provided that nothing in this paragraph shall prohibit the board or committee from requesting that the person who is subject to the complaint present information as background or answer questions at a committee or board meeting prior to the commencement of deliberations or voting related thereto.
6. The President (or Chairperson of the Board of Directors, if the report relates to the President) may delegate the responsibility to investigate the report to any other

individual(s), including person(s) who are not employed by the Corporation; provided, however, that such responsibility may not be delegated to any person(s) who is/are the subject of such report.

## Policy Distribution

A copy of this Whistleblower Policy shall be distributed to all directors, officers, key persons, employees and volunteers who provide substantial services to the Corporation. Posting the policy on the Corporation's website or at the Corporation's offices in a conspicuous location accessible to employees and volunteers are among the methods the Corporation may use to satisfy the distribution requirement.