

**WHISTLEBLOWER POLICY
OF
The College of Staten Island Association, Inc.**

1.0 INTRODUCTION AND PURPOSE

The College of Staten Island Association, Inc. (the “Corporation”) requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities to the Corporation.

The purpose of this policy is to ensure an ethical and open work environment, to ensure that the Corporation has a governance and accountability structure that supports its mission, and to encourage and enable directors, officers, employees and volunteers of the Corporation to raise serious concerns about the occurrence of unethical or possibly illegal actions within the Corporation before turning to outside parties for resolution.

This policy applies to any matter which is related to the Corporation’s business and does not relate to private acts of an individual not connected to the business of the Corporation. This policy is intended to supplement but not replace any Corporation policy regarding unlawful harassment or discrimination, any other grievance procedure, and any applicable state and federal laws governing whistleblowing applicable to nonprofit and charitable organizations.

2.0 Reporting Responsibility

All directors, officers, employees and volunteers of the Corporation have a responsibility to report any action or suspected action taken within the Corporation that is unethical, possibly illegal, or violates any adopted policy of the Corporation (each, a “Violation”).

The following are examples of Violations that should be reported:

- Stealing or misappropriation of the Corporation’s funds, supplies or other assets
- Fraud or deliberate error in the preparation, review or audit of financial statements
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked, or failing to account for vacation, sick leave or other paid time off
- Unauthorized alteration of Corporation records or documents
- Unlawful harassment or discrimination

Anyone reporting a Violation must act in good faith, without malice to the Corporation or any individual in the Corporation, and must have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. A person who makes a report does not have to prove that a Violation has occurred. However, a reporter who makes a report that he or she has good reason to believe is false will be subject to serious discipline, up to and including termination of employment or volunteer status.

3.0 NO RETALIATION

No director, officer, employee or volunteer of the Corporation who in good faith reports a Violation or who, in good faith, cooperates in the investigation of a Violation shall suffer harassment, retaliation or adverse employment consequences. Any individual within the Corporation who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

If you believe that an individual who has made a good faith report of a Violation or who has, in good faith, cooperated in the investigation of a Violation is suffering harassment, retaliation or adverse employment consequences, please contact the Executive Director of the Corporation (the "Compliance Officer").

4.0 REPORTING PROCESS

The Corporation has an open door policy and suggests that directors, officers, employees, and volunteers address their concerns relating to a Violation to any person within the Corporation who can properly address those concerns. In most cases, the direct supervisor of an employee or volunteer will be the person best suited to address a concern. However, if you are not comfortable speaking with your supervisor, if you are not satisfied with your supervisor's response, or if your supervisor is the person suspected of having committed a violation, you are encouraged to speak to the Compliance Officer or to anyone in management you feel comfortable approaching. If you want to make a report of a Violation involving unlawful harassment or discrimination, and the Corporation has a harassment and/or discrimination policy, you should follow the reporting procedures described in that policy.

5.0 CONFIDENTIALITY

The Corporation encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis by the reporter or may be submitted anonymously. Reports of Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities.

6.0 HANDLING REPORTED VIOLATIONS

The supervisor, manager or board member who receives a report of a Violation shall notify the Compliance Officer of that report, unless the report relates to the Compliance Officer. (In the event the Compliance Officer is suspected of having committed a Violation, then the Violation should be reported to the Corporation's chief financial officer and the Violation will be investigated by chief financial officer under supervision of the Board of Directors.) The Compliance Officer will notify the reporter and acknowledge receipt of the Violation report within five business days, but only if the reporter's identity is disclosed or a return address is provided.

The Compliance Officer is responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation. The reporter will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations.

If the Corporation has an audit committee, that committee shall be responsible for addressing all reported concerns or complaints of Violations relating to corporate accounting practices, internal controls or auditing. In situations involving reports of these types of Violations, the Compliance Officer shall immediately notify the audit committee. In addition, if the Compliance Officer deems it appropriate, the Compliance Officer may advise the Executive Director or the audit committee of any other reported Violations.

The Compliance Officer shall report to the Corporations' Board of Directors at least annually on compliance activity.

Adopted by the Corporation's Board of Directors at its Meeting on 9/22/10

Compliance Officer – Marianne McLaughlin, Executive Director
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