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.


Cornelia D. Mead  
Secretary

[Signature]  
12/6/2019  
Date