

**SUNY College at Oneonta Alumni Association, Inc.**  
**Code of Conduct; Protection Against Retaliation for Whistle-blowers;**  
**and Procedures for the Receipt of Complaints**

Policy Statement: In keeping with the policy of maintaining high standards of conduct and ethics, the SUNY College at Oneonta Alumni Association (hereinafter “Association”) will investigate any suspected fraudulent or dishonest use or misuse of the Association's resources or property by staff, Board members, consultants, auditors or volunteers. The Association is committed to maintaining the highest standards of conduct and promotes a working environment that values respect, fairness and integrity. All staff, Board members and volunteers shall act with honesty, integrity and openness in all their dealings as representatives for the Association. Failure to follow these standards will result in disciplinary action, including possible termination of employment, dismissal from the Board, or possible civil or criminal prosecution if warranted.

Director of Alumni Engagement as Compliance Officer: The Director of Alumni Engagement (hereinafter “Director”) is the Compliance Officer for the purposes of this policy and is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and all other reported complaints under the Whistleblower Policy and, at the Director’s discretion, shall advise the SUNY Oneonta President and President of the Alumni Association Board. The Director will report all activity under the Whistleblower Policy to the Finance Committee. The Finance Committee will consider all reports and have ultimate oversight responsibility for all matters reported pursuant to the Whistleblower Policy.

Reporting: Staff, Board members, consultants or auditors are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as "whistle-blower"), pursuant to the procedures set forth below. For staff, any concerns or complaints about possible fraudulent or dishonest use or misuse of resources or property should be reported to that person's supervisor. If, for any reason, a person finds it difficult to report his or her concerns to a supervisor, that person may report the concerns directly to the Director. All others covered herein should report any such concerns to the Director. If for any reason, a person finds it difficult to report to the Director, that person may report the concerns directly to the Vice President for College Advancement. Anonymous reports may be submitted in writing to one of the individuals listed.

Fraudulent or Dishonest Conduct: A deliberate act or failure to act with the intention of obtaining an unauthorized benefit may be the subject of a concern or complaint regarding the accounting or fiscal matters of the Association. Examples of such conduct include, but are not limited to:

- \*forgery or alteration of documents;
- \*unauthorized alteration, manipulation or destruction of computer files;
- \*fraudulent financial reporting;
- \*misappropriation or misuse of Association resources, such as funds or other assets; or
- \*authorizing or receiving compensation for goods not received or services not performed.

Rights and Responsibilities: No person will be subject to retaliation because of a good faith

report of a concern or complaint regarding accounting or fiscal matters or any alleged violation of law pertaining to the management of the Board's funds and its assets. Board Members and staff members are required to immediately report suspected fraudulent or dishonest conduct to the Director or to the President of the Board.

Procedures for Complaints: The submission of concerns or complaints that address accounting or fiscal matters may be submitted by individuals to the Director. All complaints will be filed with the Director. Upon receipt of a concern or complaint, the Director will acknowledge its receipt, in writing, to the person who submitted the matter. The Director will inform the Finance Committee of all concerns and complaints regarding accounting or fiscal matters in compliance with the Sarbanes-Oxley Act of 2002 and will provide written reports to the Finance Committee, as appropriate.

The Finance Committee will investigate any report regarding accounting or fiscal matters relating to defalcations, thefts or fraud, with the assistance of any managerial employees of the Association or College, auditors or counsel, as it deems appropriate. Confidentiality will be maintained to the extent possible, consistent with applicable law and policy.

If the investigation of the concern or complaint indicates that a violation of law, regulations or policy has occurred, the Director may present the findings of the investigation to the Association's Board of Directors and to the College's Associate Vice President for Employee Services. The Director, in conjunction with President of the Board, will determine appropriate disciplinary measures or other corrective action in accordance with the policies of the SUNY College at Oneonta Alumni Association, Inc., the College, and as required by law.

Record-keeping: The Director will maintain a record of all concerns and complaints that relate to accounting or fiscal matters regarding defalcations, thefts or fraud that have been received since the adoption of this policy. The Finance Committee shall track the receipt, investigation and resolution of all such concerns and complaints, and the Finance Committee Chair shall provide periodic reports to the Board. Copies of records relating to concerns and complaints received will be maintained in accordance with the Board's records retention policy.

Confidentiality: The Director will acknowledge receipt of the complaint within three business days. It will not be possible to acknowledge receipt of anonymously submitted concerns. All complaints will be promptly investigated and appropriate corrective action will be taken by the Director, if warranted by the investigation.

Baseless Allegations: Persons who make allegations with a reckless disregard for the truth may be subject to disciplinary action by the Association or the College and legal claims by individuals accused of such conduct.

Acknowledgement: I acknowledge that I have read this policy and understand the responsibilities related to the prevention, detection, and reporting of suspected violations covered by this Policy.

\_\_\_\_\_  
(Name)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

*A motion to adopt this policy was unanimously passed by the Executive/Finance Committee at a meeting on 8/7/07.*

*Updated by the Board of Directors on June 2, 2017.*