

## **THE BUFFALO SEMINARY WHISTLEBLOWER POLICY**

The Buffalo Seminary (the “School”) requires Board of Trustees members, Administration, other employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the School must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Each Board Member, volunteer, and employee of the Organization has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) instances where one suspects that employees and representatives of the School did not practice honesty and integrity or comply with all applicable laws and regulations.

Should a trustee, officer, employee, contractor, volunteer or agent of the School have a concern or complaint regarding the accounting, auditing or reporting of, or the internal controls practices and procedures relating to School funds, the following guidelines shall be followed:

1. Contact the Head of School (the “Head”), by telephone (716-885-6780), mail (205 Bidwell Parkway, Buffalo, New York 14222), email, or in person to submit the complaint. If the complaint involves the Head, contact the current Chair of the School’s Board of Trustees (the “Chair”). Updated contact information for the individuals shall be posted on the website of the School. Submissions may be made anonymously.

2. Upon receipt of the complaint, the Head (or the Chair or the Chair’s designee) shall conduct an initial screening of the complaint to assess its nature, legitimacy and significance. If in the course of the initial screening or at any time thereafter, it is determined that the complaint may implicate the Head, he or she shall notify the Chair of that fact, and the Chair shall determine whether the Head may continue with the investigation or appoint another person(s) to assume the investigation instead.

3. Upon conclusion of the initial screening, the Head (or the Chair or the Chair’s appointee) shall decide whether to report the complaint to the Audit Committee, proceed with further investigation or close the file. Any complaint involving (i) the existence of material inaccuracies in the School’s financial reports or (ii) fraud or other intentional misconduct with respect to its accounting, auditing, reporting or internal controls, shall be reported promptly to the Audit Committee following the initial screening thereof.

4. All submissions, inquiries and discussions will be documented by the Head (or Chair).

5. All submissions, inquiries, discussions and documentation will be kept confidential, specifically in a confidential file. Access to the confidential file shall be restricted to the Head, the Chair or the Chair’s appointee, and their designated agents. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of

wrongful conduct and to protect the School from potential civil liability. All such confidential files shall be maintained for at least seven years following the final disposition of the matter.

6. All other concerns and complaints not relating to the accounting, auditing or reporting of, or the internal controls practices and procedures relating to the School funds shall be handled pursuant to the current policies and procedures applicable to such matters.

7. The School shall take all appropriate steps to prevent retaliation by the School, or its trustees, officers, employees, volunteers or agents, against any person submitting a complaint on account of that submission. This Whistleblower Policy is intended to encourage and enable Trustees, Administration, and employees to raise concerns within the organization for investigation and appropriate action. With this goal in mind, no one who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences.