



## HARVARD BUSINESS SCHOOL CLUB OF GREATER NEW YORK

### WHISTLEBLOWER POLICY

#### 1. PURPOSE

All directors, officers, employees, staff and volunteers (together, “Community Representatives”) have the responsibility to comply with the policies and procedures of Harvard Business School Club of Greater New York (the “Club”) and with applicable law, and to report violations or suspected violations in accordance with this Whistleblower Policy. The Club specifically prohibits terminating, demoting, or taking any other adverse action against any Community Representative for reporting what they have reason to believe is improper conduct by anyone at any level of the Club.

The terms of this Whistleblower Policy may, at the discretion of the Board, change from time to time and, as such, Community Representatives should review this policy on a regular basis but especially before taking action on behalf of the Club.

#### 2. PROCEDURES

- i. If any Community Representative reasonably believes that some policy, practice, or activity of the Club is in violation of law, a written complaint must be filed by them with the Chair of the Board, or, in event that the concern is with an activity of the Chair of the Board, then with the President of the Club or Chair of the Audit Committee. Nothing in this policy protects Community Representatives from the consequences of their own unethical, unprofessional, or illegal conduct, including making malicious or reckless allegations.
- ii. The Chair of the Board (or President or Chair of the Audit Committee) shall report to the Audit Committee of the Board of Directors any written complaint. The Audit Committee will investigate the complaint and will report if appropriate to the Chair and Board of Directors of the Club.
- iii. It is the intent of the Club to adhere to all laws and regulations that apply to the Club and the purpose of this policy is to support the Club’s goal of legal compliance. The support of all Community Representatives is necessary in achieving compliance with various laws and regulations. Each Community Representative is protected from retaliation only if such Community Representative brings the alleged unlawful activity, policy, or practice to the attention of the Club and provides the Club with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to Community Representatives that comply with this requirement.

The Club will not retaliate against a Community Representative who in good faith, has made a protest or raised a complaint against some practice of the Club, or of another individual or entity with whom the Club has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy. The Club will not retaliate against a Community Representative who discloses or threatens to disclose to a public body, any activity, policy, or practice of the Club that the Community Representative reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare or protection of the environment.

- iv. Each Community Representative shall annually sign a statement which affirms that such person:
  - i) Has received a copy of the Whistleblower Policy;
  - ii) Has read and understands the policy;
  - iii) Has agreed to comply with the policy; and
  - iv) Understands that the Club is charitable and in order to maintain its federal tax exemption must engage primarily in activities that accomplish one or more of its tax-exempt purposes.

Adopted by the Harvard Business School Club of Greater New York Board as of March 2024.