

## **Whistleblower Policy of New York Public Radio**

### **General**

New York Public Radio (NYPR) requires its directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of NYPR, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

This Whistleblower Policy provides a mechanism for NYPR directors, officers, employees, and volunteers to report suspected violations of ethical, legal, and regulatory requirements. The matters which may be reported under this policy include suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of NYPR assets, or suspected regulatory, compliance, or ethics-related issues, concerns, or violations (Reports). All directors, officers, and employees who choose to make a Report may do so in accordance with this Whistleblower Policy.

This policy is not a vehicle for reporting violations of NYPR's applicable human resources policies, problems with co-workers or managers, or for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be dealt with in accordance with NYPR's Employee Handbook, as it is the Handbook that is applicable to such matters.

A copy of this policy will be distributed to all directors, officers, employees, and volunteers who provide substantial services to NYPR.

### **No Retaliation**

No director, officer, employee, or volunteer who makes a Report in good faith will suffer harassment, retaliation, intimidation, discrimination, or adverse employment consequence. An employee who retaliates against someone who has made a Report in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within NYPR prior to seeking resolution outside NYPR.

### **Reporting Violations**

Questions, concerns, suggestions, complaints, or Reports should be addressed directly to NYPR's General Counsel. Reports about the General Counsel should be addressed directly to the Chair of NYPR's Audit Committee.

## **Investigations**

The General Counsel will investigate all Reports, and if the General Counsel determines that a potential violation of a high business and personal ethical standards and/or applicable legal requirements has occurred, the General Counsel will take all appropriate action. The General Counsel will in addition forward all Reports and a summary of any investigations to the Chair of NYPR's Audit Committee.

## **Acting in Good Faith**

Anyone filing a Report must act in good faith and have reasonable grounds for believing the information disclosed may justify the filing of a Report. 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.

## **Confidentiality**

Reports may be submitted on a confidential basis by the complainant. Reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **Handling of Reported Violations**

The General Counsel will notify the sender and acknowledge receipt of the Report within five business days. All Reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

General Counsel: Ivan Zimmerman, 646-829-4368

NYPR Chair of the Audit Committee: [auditcommittee@nypr.org](mailto:auditcommittee@nypr.org)