

Whistleblower Policy

Effective Date: November 1, 2020

The Code of Ethics of Carnegie Corporation of New York (the “Corporation”) requires trustees, officers, and staff members to observe high standards of organizational and personal ethics in the conduct of their duties and responsibilities. All parties must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. In that regard, the Corporation has adopted this Whistleblower Policy to address the submission by trustees, officers, employees and of complaints, concerns and violations with respect to one or more of the following matters:

- Questionable accounting, internal accounting controls and auditing matters;
- Compliance with legal and regulatory requirements;
- A violation of the Corporation’s Code of Ethics;
- Theft of any kind;
- Any other action that is illegal or fraudulent; or
- A retaliatory act against a trustee, officer, employee , or who reports a violation of any of the above.

Procedure for Reporting Violations: Trustees, officers, and staff members have a duty to share their complaints, concerns and violations with someone who can address them properly. Staff members should generally report complaints, concerns and violations to their supervisors, Human Resources , or a member of the executive leadership team. In many cases, a staff member’s supervisor is in the best position to address an area of concern. However, if a staff member would prefer to make a confidential or anonymous report, they can do so via an external reporting tool, EthicsPoint. Reports can be made in the following ways:

- 1) By phone (844) 973-2725
- 2) By computer <https://secure.ethicspoint.com/domain/media/en/gui/75473/index.html>
- 3) By smartphone <https://carnegiecorpny.navexone.com/>
- 4) By QR code



Supervisors are required to report accounting, legal or regulatory violations or violations of the Code of Ethics to the Compliance Officer or CHRO, who will investigate reported violations.

Compliance Officer: The Corporation's Compliance Officer is the Chief Administrative Officer and Corporate Secretary of the Corporation. The Compliance Officer is responsible for administering this Whistleblower Policy and is required to report to the Audit Committee annually on compliance activity. The Compliance Officer shall ensure a thorough investigation of or assign all complaints, concerns, and violations reported and shall advise (i) the President and the CHRO, if appropriate, at her/his discretion and (ii) the Audit Committee as required below under "Legal and Accounting matters" of such reports.

No Retaliation: No trustee, officer, or employee, who in good faith reports a complaint, concern or violation in accordance with this Whistleblower Policy shall suffer intimidation, harassment, discrimination, adverse employment consequences or other retaliation. A trustee, officer, supervisor or staff member who retaliates against someone who has reported a violation is subject to disciplinary action up to and including removal from the board or termination of employment.

Legal and Accounting Matters: The Compliance Officer shall immediately report to the Audit Committee, and the Audit Committee shall address, all reported complaints, concerns or violations regarding the Corporation's accounting, internal accounting controls or auditing matters or the Corporation's legal or regulatory requirements. The Compliance Officer shall work with the Committee toward a resolution of the issue.

Confidentiality: Complaints, concerns and violations may be submitted to the Compliance Officer on a confidential basis by the complainant or may be submitted anonymously. Reports of complaints, concerns or violations will be kept confidential to the extent consistent with a thorough investigation unless otherwise compelled by law or other judicial process.

Handling of Reported Violations: The Compliance Officer will notify the sender and acknowledge receipt of the complaint, concern or violation within seven days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by an investigation.

Records: For a period of seven years from the date of the complaint or after the employee's final date of employment, whichever is later, the Compliance Officer shall retain all records relating to any complaint, concern or violation reported to her/him in accordance with this Whistleblower Policy. If the complaint involves workplace safety, the retention period is 20 years.

Distribution: A copy of this Whistleblower Policy will be distributed to all trustees, officers, and employees of the Corporation who provide substantial services to the Corporation.