

## New York Chapter - Whistleblower Policy

**Section 1. General.** The Adirondack Mountain Club, Inc. (“ADK”) requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The New York Chapter (“Chapter”), as representatives of ADK and as a New York State not-for-profit corporation, must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**Section 2. Reporting.** It is the responsibility of all directors, officers and volunteers to report ethics violations and suspected violations in accordance with this Whistleblower Policy. All new Chapter Board of Director (“Board”) members will be provided with a copy of this Whistleblower Policy and it shall be published on the Chapter website.

ADK has an open-door policy and suggests that all members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a member of the Board is in the best position to address an area of concern. However, if a member is not comfortable speaking with a Board member or is not satisfied with the response received, the member is encouraged to speak with any of the Committee Chairs or the Audit Compliance Officer if applicable.

**Section 3. Accounting and Auditing Matters.** The Audit Compliance Officer shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Audit Compliance Officer shall immediately notify the Board of any such complaint and work with the Board until the matter is resolved.

**Section 4. No Retaliation.** No director, officer, member, or volunteer of the Chapter who in good faith reports any action or suspected action taken by or within the Chapter that is illegal, fraudulent or in violation of any adopted policy of the Chapter will suffer intimidation, harassment, discrimination or other retaliation. “Good faith” means that that reporter has reasonable grounds for believing the information disclosed indicates that a violation has occurred. Allegations that both prove not to be substantiated and which prove to have been made maliciously or knowingly to be false may result in disciplinary action.

**Section 5. Confidentiality.** Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Section 6. Handling of Reported Violations.** The Board, Committee Chairs, or Audit Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within a reasonable amount of time. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

### **Audit Compliance Officer**

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### **ADK Main Club Management Staff**

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