

## SOUTHERN TIER NETWORK, INC.

### **Whistleblower Protection Policy**

Southern Tier Network, Inc. requires 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 the Southern Tier Network, Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

#### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Southern Tier Network, Inc. can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Southern Tier Network, Inc.'s code of ethics or suspected violations of law or regulations that govern Southern Tier Network, Inc.'s operations.

#### **No Retaliation**

It is contrary to the values of Southern Tier Network, Inc. for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Southern Tier Network, Inc. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

#### **Reporting Procedure**

Southern Tier Network, Inc. has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with [STN Board Chairperson]. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Southern Tier Network, Inc.'s [Compliance Officer, The STN Board Chairperson], who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the CEO or the organization's Compliance Officer [STN Board Chairperson].

#### **Compliance Officer [STN Board Chairperson]**

The Southern Tier Network Inc.'s Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the [STN CEO and/or board Governance Committee] of all complaints and their resolution and will report at least annually to the [STN Audit Committee] on compliance activity relating to accounting or alleged financial improprieties.

**Accounting and Auditing Matters**

The Southern Tier Network, Inc.'s [Compliance Officer, STN Board Chairperson] shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

**Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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**

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

**Handling of Reported Violations**

The Southern Tier Network Inc.'s [Compliance Officer, STN Board Chair] will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer: \* {Note: The STN Board Chairperson}

STN Board Chairperson  
Southern Tier Network, Inc.  
88 E Tioga Ave, Suite 201  
Corning, New York 14830  
607.463.8485

Policy approved by the Board of Directors on {10/10/2019}.