

RENSSELAER COUNTY CAPITAL RESOURCE CORPORATION

WHISTLEBLOWER POLICY

I. Statement of Purpose

The Rensselaer County Capital Resource Corporation (the “Corporation”) has adopted this Whistleblower Policy (the “Policy”) in accordance with Section 2824(1)(e) of the New York State Public Authorities Law (“PAL”). This Policy shall be consistent with and in compliance with the provisions Section 1411 of the New York State Not-For-Profit Corporation Law and any other applicable law.

II. Policy

Every director of the board (the “Board”) of the Corporation and all officers and employees thereof, in the performance of their duties shall conduct themselves with honesty and integrity and observe the highest standards of business and personal ethics as set forth in the Code of Ethics of the Corporation (the “Code”).

Each director, officer or employee is responsible to report any violation of the Code (whether suspected or known) to the Corporation’s Chairman. Reports of violations will be kept confidential to the extent possible. No individual, regardless of his or her position with the Corporation, will be subject to any retaliation for making a good faith claim and any employee who chooses to retaliate against someone who has reported a violation shall be subject to disciplinary action, which may include termination of employment. All claims of retaliation will be taken and treated seriously and, irrespective of the outcome of the initial complaint, will be treated as a separate offense.

The Chairman is responsible for immediately forwarding any claim to the Corporation’s counsel who shall investigate and handle the claim in a timely manner.

Adopted: October 11, 2018