

**ERIE COUNTY AGRICULTURAL SOCIETY
WHISTLEBLOWER POLICY**

This Whistleblower Policy of the Erie County Agricultural Society (the “Organization” or “ECAS”): (1) encourages current or former directors, officers, employees, volunteers and independent contractors who provide services to the Organization to come forward with credible information on illegal practices or serious violations of adopted policies of the ECAS, as well as, government issued executive orders and judicial or administrative rulings; (2) specifies that the ECAS will protect the person from retaliation; and (3) identifies where such information can be reported.

1. **Encouragement of reporting.** ECAS encourages complaints, reports or inquiries about illegal practices or serious violations of ECAS policies, including illegal or improper conduct by the Organization, its leadership, or by others in a position to represent the Organization. Appropriate subjects to raise under this policy would include financial improprieties, ethical violations, harassment or other similar illegal or improper practices or policies.
2. **Protection from retaliation.** The ECAS prohibits retaliation by or on behalf of the ECAS against current or former directors, officers, employees, volunteers and independent contractors who provide services to the Organization, for making good faith complaints, reports or inquiries if such person has a reasonable belief that the employer is violating a law, rule, regulation, executive order or judicial or administrative order or ruling, or that the employer’s activity or policy poses a substantial and specific danger to public health or safety. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The ECAS reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.
3. **Where to report.** Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. The complaint should describe in detail the specific facts demonstrating the basis for the complaint or report. The complaint should be directed to the Organization’s General Counsel. In the event the report of a suspected violation of law or policy or retaliation involves the General Counsel, or an individual who directly reports to the General Counsel, the report should be filed with the Organization’s Chief Executive Officer (CEO). The Organization’s General Counsel or CEO, as the case may be, shall investigate the complaint and notify the concerned individual of their findings, and, if necessary, prepare other reports and/or recommendations for the Board to act upon. Be aware that the Organization may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.
4. **Administration of the policy.** The General Counsel of the ECAS is designated as the individual to administer the policy and maintain adequate records that the Organization is in compliance with the approved policy.

Approved - October 9, 2025