

THE COOPER UNION FOR THE ADVANCEMENT FOR SCIENCE AND ART

WHISTLEBLOWER POLICY

The Cooper Union for the Advancement of Science and Art (“Cooper Union”) prohibits retaliation against any person who provides truthful information to Cooper Union concerning any financial impropriety or other serious misconduct such as sexual harassment by any employee of Cooper Union. “Serious misconduct” is defined, for purposes of this policy, as conduct that violates any law or any written policy of Cooper Union. Cooper Union requires trustees, 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 Cooper Union, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. This policy is intended to encourage and enable employees and others to raise serious concerns internally so that Cooper Union can address and correct inappropriate conduct and actions. The Governance and External Affairs Officer has been designated to administer this policy and to report to the Audit Committee regarding the policy. No trustee who is an employee may participate in any Board of Trustees or committee deliberations or voting related to administration of this policy.

This policy shall be distributed to all trustees, officers, and employees, and to volunteers who provide substantial services to Cooper Union.

No trustee, officer, employee, or volunteer who in good faith reports any action or suspected action taken by or within Cooper Union that is illegal, fraudulent or in violation of any adopted policy of Cooper Union shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequences. Any person who 1) has witnessed or reasonably believes that he or she has evidence of such misconduct, or 2) believes that he or she has been the subject of prohibited retaliation, is strongly encouraged to report immediately the facts forming the basis of that belief or knowledge to his or her Dean or supervisor. Alternatively, the person may report such misconduct or prohibited retaliation by submitting a written charge, to The Cooper Union for the Advancement of Science and Art, PO Box 578, New York, NY 10276 (Attn: Governance and External Affairs Officer).

Upon receiving such a complaint, Cooper Union will promptly conduct a thorough investigation. Those responsible for the investigation will maintain the confidentiality of the allegations of the complaint and the identity of the person(s) involved, subject to the need to conduct a full and impartial investigation and remedy any violations of Cooper Union policies. The Chair of the Audit Committee will be fully informed of all complaints.

In the event that an investigation establishes that Cooper Union or any Cooper Union employee has engaged in such misconduct or prohibited retaliation, Cooper Union will take prompt and appropriate corrective action.

No person who is the subject of a complaint may be present at or participate in Board of Trustees or committee deliberations or votes on the matter relating to such complaint, provided that nothing shall prohibit the Board of Trustees or committee from requesting that such person

present background information or answer questions at a meeting prior to the commencement of deliberations and voting relating to the matter.