

COLD SPRING HARBOR LABORATORY
WHISTLEBLOWER POLICY

Amended and Restated: February 3, 2022

1.0 PURPOSE

This Whistleblower Policy (“Policy”) outlines reporting procedures and protections made available by Cold Spring Harbor Laboratory (the “Laboratory”) to its trustees, officers, employees, former employees, independent contractors, students, and volunteers who, in good faith, seek to or actually report illegal, fraudulent, dishonest or in violation of the Laboratory’s policies.

This Policy is not a general grievance procedure, and employment-related concerns should --

“Whistleblower” means a trustee, officer, employee, student or volunteer of the Laboratory who in good faith reports an activity or suspected activity that is reasonably believed to be illegal, fraudulent, dishonest or in violation of an adopted policy of the Laboratory, an executive order, or a judicial or administrative decision, ruling or order, to one or more of the parties specified in this Policy. A whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. Examples of illegal, fraudulent or dishonest activities, or activities in violation of the Laboratory’s adopted policies, include but are not limited to violations of federal, state or local laws; billing or assisting in billing the Laboratory for services not performed or for goods not delivered; misuse or misappropriation of grant or other Laboratory funds; and other fraudulent financial reporting.

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including (i) adverse employment actions or threats to take such adverse employment actions against an employee in the terms or conditions of employment, including but not limited to discharge, suspension or demotion; (ii) actions or threats to take such actions that would adversely impact an employee's current or future employment, or (iii) threatening to contact or contacting United States immigration authorities or otherwise reporting or threatening to report an employee's suspected citizenship or immigration status or the suspected citizenship or immigration status of an employee's family or household member.

- 2.2 Reporting.** If an employee, trustee, officer, student or volunteer of the Laboratory has knowledge of or suspects illegal, fraudulent or dishonest activity, or activity that violates any of the Laboratory's adopted policies, they should contact their immediate supervisor at the Laboratory (if applicable), the Chief Operating Officer or General Counsel of the Laboratory, or the Chair of the Laboratory's Audit & Risk Committee (AuditChair@cshl.edu), or they should submit an anonymous

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