

MUNIPRO, INC.

Whistleblower Policy

Adopted: January 16, 2008
Readopted: October 28, 2008
Readopted: October 28, 2009
Readopted: December 15, 2010
Readopted: February 24, 2016
Revised and Adopted: February 23, 2017

MUNIPRO, INC. (the "Corporation"), pursuant to the Authority contained in Section 858, Title 1 of Article 18A of the General Municipal Law, as set out in Chapter 1030 of the Laws of 1969, and Section 916 of the General Municipal Law as set out in Chapter 55 of the Laws of 1972 of the State of New York, sets forth the following Whistleblower policy. This policy is to protect the employees of the Corporation and the employees of any entity contracted to perform management services for the Corporation who make allegations to officials of the Corporation of illegal activity or misconduct.

1. Illegal activity or misconduct is any action by an officer, or an employee of the Corporation or a contracted manager which is undertaken on behalf of the Corporation in violation of any federal, state or local law, rule or regulation.
2. Any Corporation employee including employees of a contracted manager may, in good faith, provide information on any matter involving illegal activity or misconduct to the President of the Corporation or any member of the Board who shall conduct such investigation or cause such investigation to be conducted as may be appropriate. In conducting an investigation, best efforts shall be used to keep confidential the identity of the person providing the information which initiated the investigation, unless it is determined the information was provided other than in good faith. The result of any investigation shall be reported to such other agency as deemed appropriate.

3. No Corporation Director, Officer, or employee including those of a contracted manager, may, directly or indirectly, use or attempt to use his/her official authority or influence for the purpose of intimidating, threatening, coercing, commanding, influencing or attempting to intimidate, threaten, coerce, command or influence any individual for the purpose of interfering with the right of such individual to disclose information relative to illegal activity or misconduct. Pursuant to this section, "use or attempt to use official authority to influence" includes promising to confer or conferring any benefit or threatening to effect any reprisal.