

SARATOGA COUNTY CAPITAL RESOURCE CORP.

WHISTLEBLOWER POLICY

General:

The Saratoga County Capital Resource Corporation's Code of Ethics ("Code") requires directors, officers, and staff members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Corporation, everyone must practice honesty and integrity in fulfilling the Corporation's responsibilities and complying with all applicable laws and regulations.

Reporting Responsibility:

It is the responsibility of all directors, officers and staff members to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation:

No director, officer, or staff member who legally and in good faith reports a violation of the Code shall be harassed, threatened, fired, discharged, demoted, retaliated against, or be discriminated against because of his or her role as a whistleblower. A staff member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. A Board member or officer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including removal from office. This Whistleblower Policy is intended to encourage and enable anyone to raise serious concerns within the Corporation prior to seeking resolution outside the Corporation.

Reporting Violations:

The Code addresses the Corporation's open-door policy and suggests that staff share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the Corporation's CEO is in the best position to address an area of concern. If staff members are not comfortable speaking with the CEO or are not satisfied with the CEO's response, staff members are encouraged to speak with any member of the Board of Directors or anyone in management whom they are comfortable in approaching. Board members and officers are required to report suspected violations of the Code of Conduct to the Ethics Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or are uncomfortable with following the Corporation's open-door policy, individuals should contact the Ethics Officer directly.

Ethics Officer:

The Corporation's Ethics Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his or her discretion, shall advise senior management and the Audit Committee. The Ethics Officer has direct access to the Audit Committee of the Board of Directors and is required to report to the Audit Committee at least annually on compliance activity. The Ethics Officer serves as the Chair of the Audit Committee, or member of same as designated by the Board of Directors.

Accounting and Auditing Matters:

The Audit Committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Ethics Officer shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

Acting in Good Faith:

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be reviewed and acted upon by the Board of Directors.

Confidentiality:

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations:

The Ethics Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Adopted: January 3, 2013, Res. # 7-13

Amended: April 27, 2023, Res. # -23