

737 Comstock Avenue, Inc.

Record Retention Policy

(Effective July 1, 2012)

It is the policy of 737 Comstock Avenue Inc. to retain records of all business operations as follows.

Business records to be stored include:

- Annual Business Records
 - Bank Statements
 - Payroll Records
 - Cash disbursement and Accounts Payable Records including paid invoices
 - Cash receipts and Accounts Receivable Records including invoices.
 - Contracts for services and housing.
 - Mortgages and bank notes.
- Corporate Business Records
 - Deeds for real property.
 - Insurance Policies – current copy of policy
 - Corporate Records (certificate of incorporation, by-laws, conflict of interest policy, etc.)
 - Annual Form 990 tax returns
 - Form 1024 Tax Exempt Status

Permanent Record Room will be located at 737 Comstock Avenue, Syracuse NY 13210

1. A fire proof safe will be used to store the most recent 7 years of Active Annual Business Records.
2. Active Annual Business Records will be moved to the Permanent Record Room following the filing of the annual Form 990.
3. Annual Business Records more than 7 years old will be moved out of the fire proof safe and stored in cardboard records storage boxes for an additional 10 years. Annual Business Records more than 17 years old may be destroyed.
4. Corporate Business Records shall be stored in the fire proof safe at all times.

737 Comstock Avenue, Inc.

Whistle Blower Policy

(Effective July 1, 2012)

It is the policy of 737 Comstock Avenue Inc. to provide for a confidential means of reporting any activity which is contrary to the stated intent of the By-Laws of 737 Comstock Avenue Inc. Should any member, Director, or corporate officer have a concern that the conduct of the Board or its officers is illegal or inappropriate, you should consult with the Board of Grand Trustees of Sigma Chi Fraternity.

Contact information for current grand trustees can be found at:

http://thesighouse.org/page.php?page_id=19895.

Current Grand Trustees as of July 1, 2012 are:

Rich Thompson (2017) rich.thompson@sigmachi.com Ph 503.977.7974

Board Chairman

Provinces: Northwestern, The Big Sky

JB Allen (2015) jballen@sig1855.com Ph 212.849.3973

Provinces: Hudson Valley, Mid Atlantic, Northwestern New York

Rich Hronek (2017) hronesign@gmail.com Ph 440.934.4114

Board Secretary

Provinces: Northern Indiana, Southern Indiana, Northern Ohio, Southern Ohio

Steve Schuyler (2015) sgschuyler@sigmachi.com Ph 520.745.6221

Board Vice Chairman

Provinces: Grand Canyon, Southwestern, Utah/Nevada

Harvey Silverman (2015) harveyas@aol.com Ph 703.319.8806

**Grand Trustee Liaison to Executive Committee
Corporation Compliance Assistance Committee**

Provinces: Central Pennsylvania, Eastern Virginia, Western Virginia, West Virginia/Western Pennsylvania

Chad Ward (2015) chad.ward@sigmachi.com Ph 972.571.5202

Corporation Compliance Assistance Committee

Provinces: Central Texas, Northern Texas

737 Comstock Avenue Inc.

Policy on Conflicts of Interest and Disclosure of Certain Interests

This conflict of interest policy is designed to help directors, officers and employees of the 737 Comstock Avenue Inc., identify situations that present potential conflicts of interest and to provide the 737 Comstock Avenue Inc., with a procedure which, if observed, will allow a transaction to be treated as valid and binding even though a director, officer or employee has or may have a conflict of interest with respect to the transaction.

1. Conflicts of Interest Defined. For purposes of this policy, the following circumstances shall be deemed to create Conflicts of Interest:

A. Outside Interests.

- (i) A Contract or Transaction between the 737 Comstock Avenue Inc., and a Responsible Person or Family Member.
- (ii) A Contract or Transaction between the 737 Comstock Avenue Inc., and an entity in which a Responsible Person or Family Member has a Material Financial Interest or of which such person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator or other legal representative.

B. Outside Activities.

A Responsible Person competing with the 737 Comstock Avenue Inc., in the rendering of services or in any other Contract or Transaction with a third party.

C. Gifts, Gratuities and Entertainment. A Responsible Person accepting gifts, entertainment or other favors from any individual or entity that:

- (i) does or is seeking to do business with the 737 Comstock Avenue Inc.; or
- (ii) has received, is receiving or is seeking to receive a loan or grant, or to secure other financial commitments from the 737 Comstock Avenue Inc.

2. Definitions.

- A. A "Conflict of Interest" is any circumstance described in Part 1 of this Policy.
- B. A "Responsible Person" is any person serving as an officer, employee or member of the Board of Directors or Committee of the 737 Comstock Avenue Inc.
- C. A "Family Member" is a spouse, domestic partner, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister, of a Responsible Person.
- D. A "Material Financial Interest" in an entity is a financial interest of any kind, which, in view of all the circumstances, is substantial enough that it would, or reasonably could, affect a Responsible Person's or Family Member's

judgment with respect to transactions to which the entity is a party. This includes all forms of compensation.

- E. A "Contract or Transaction" is any agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a loan or grant, the establishment of any other type of pecuniary relationship, or review of a charitable organization by the 737 Comstock Avenue Inc. The making of a gift to the 737 Comstock Avenue Inc., is not a Contract or Transaction.

3. Procedures.

- A. Prior to board or committee action on a Contract or Transaction involving a Conflict of Interest, a director or committee member having a Conflict of Interest and who is in attendance at the meeting shall disclose all facts material to the Conflict of Interest. Such disclosure shall be reflected in the minutes of the meeting.
- B. A director or committee member who plans not to attend a meeting at which he has reason to believe that the board or committee will act on a matter in which the person has a Conflict of Interest shall disclose to the chair of the meeting all facts material to the Conflict of Interest. The chair shall report the disclosure at the meeting and the disclosure shall be reflected in the minutes of the meeting.
- C. A person who has a Conflict of Interest shall not participate in or be permitted to hear the board or committee's discussion of the matter except to disclose material facts and to respond to questions. Such person shall not attempt to exert his or her personal influence with respect to the matter, either at or outside the meeting.
- D. A person who has a Conflict of Interest with respect to a Contract or Transaction that will be voted on at a meeting shall not be counted in determining the presence of a quorum for purposes of the vote. The person having a conflict of interest may not vote on the Contract or Transaction and shall not be present in the meeting room when the vote is taken, unless the vote is by secret ballot. Such person's ineligibility to vote shall be reflected in the minutes of the meeting. For purposes of this paragraph, a member of the Board of Directors of the 737 Comstock Avenue Inc., has a Conflict of Interest when he stands for election as an officer or for re-election as a member of the Board of Directors.
- E. Responsible Persons who are not members of the Board of Directors of the 737 Comstock Avenue Inc., or who have a Conflict of Interest with respect to a Contract or Transaction that is not the subject of Board or committee action, shall disclose to the Chair or the Chair's designee any Conflict of Interest that such Responsible Person has with respect to a Contract or Transaction. Such disclosure shall be made as soon as the Conflict of Interest is known to the Responsible Person. The Responsible Person shall refrain from any action that may affect the 737 Comstock Avenue Inc.'s participation in such Contract or

Transaction. In the event it is not entirely clear that a Conflict of Interest exists, the individual with the potential conflict shall disclose the circumstances to the Chair or the Chair's designee, who shall determine whether there exists a Conflict of Interest that is subject to this policy.

4. Violations of the Conflicts of Interest Policy

- A. If the Board or Committee has reasonable cause to believe that a Responsible Person has failed to disclose actual or possible conflicts of interest, it shall inform the Responsible Person of the basis for such belief and afford the Responsible Person an opportunity to explain the alleged failure to disclose.
- B. If, after hearing the response of the member and making such further investigation as may be warranted in the circumstances, the board or committee determines that the member has in fact failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

5. Confidentiality. Each Responsible Person shall exercise care not to disclose confidential information acquired in connection with such status or information the disclosure of which might be adverse to the interests of the 737 Comstock Avenue Inc. Furthermore, a Responsible Person shall not disclose or use information relating to the business of the 737 Comstock Avenue Inc., for the personal profit or advantage of the Responsible Person or a Family Member.

6. Review of policy.

- A. Each new Responsible Person shall be required to review a copy of this policy and to acknowledge in writing that he has done so.
- B. Each Responsible Person shall annually complete a disclosure form identifying any relationships, positions or circumstances in which the Responsible Person is involved that he believes could contribute to a Conflict of Interest arising. Such relationships, positions or circumstances might include service as a director of or consultant to a nonprofit organization, or ownership of a business that might provide goods or services to the 737 Comstock Avenue Inc. Any such information regarding business interests of a Responsible Person or a Family Member shall be treated as confidential and shall generally be made available only to the Chair, the Executive Director, and any committee appointed to address Conflicts of Interest, except to the extent additional disclosure is necessary in connection with the implementation of this Policy.
- C. This policy shall be reviewed annually by each member of the Board of Directors. Any changes to the policy shall be communicated immediately to all Responsible Persons.

737 Comstock Avenue Inc.

Conflict of Interest Information Form

Name: _____ Date: _____

Please describe below any relationships, positions, or circumstances in which you are involved that you believe could contribute to a Conflict of Interest (as defined in the 737 Comstock Avenue Inc.'s Policy on Conflicts of Interest) arising.

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of the 737 Comstock Avenue Inc., that is currently in effect.

Signature: _____ Date: _____