

**OSWEGO TOBACCO ASSET SECURITIZATION CORPORATION
WHISTLEBLOWER POLICY**

I. STATEMENT OF PURPOSE

The Oswego Tobacco Asset Securitization Corporation (“Corporation”) has adopted this Whistleblower Policy (the “Policy”) in accordance with Title 5-A of the New York State Public Authorities Law (“PAL”). This Policy shall be consistent with and in compliance with applicable law.

II. POLICY

Every member of the board (the “Board”) of the Corporation and all officers and employees thereof, in the performance of their duties shall conduct themselves with honesty and integrity and observe the highest standards of business and personal ethics as set forth in the Code of Ethics of the Corporation (the “Code”).

Each member, officer or employee is responsible to report any violation of the Code (whether suspected or known) to the Corporation’s President. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position with the Corporation, will be subject to any retaliation for making a good faith claim, and any employee who chooses to retaliate against someone who has reported a violation, shall be subject to disciplinary action. All claims of retaliation will be taken and treated seriously, and irrespective of the outcome of the initial complaint, will be treated as a separate offense.

The President is responsible for immediately forwarding any claim to the Corporation's counsel who shall investigate and handle the claim in a timely manner.