

**ARTICLE VII**  
**WHISTLEBLOWER POLICY**

In accordance with Title 12 of Article 9 of the Public Authorities Law, the Agency adopted a Whistleblower Policy to afford certain protections to individuals who, in good faith, report violations of the Agency's Code of Ethics or other instances of potential wrongdoing within the Agency. This Policy provides Agency directors, officers, and employees with a confidential means to report credible allegations of misconduct, wrongdoing, or unethical behavior and to protect those individuals, when acting in good faith, from personal or professional retaliation. The Whistleblower Policy is available to all directors, officers, and employees of the Agency.

Approved and adopted this 20<sup>th</sup> day of April, 2016

**BROOME COUNTY INDUSTRIAL DEVELOPMENT AGENCY  
WHISTLE-BLOWER PROTECTION POLICY**

Every member of the Board of Directors (the Board) of the Broome County Industrial Development Agency (the Agency) 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 set forth in the Code of Ethics of the Agency (the Code)

Each member, officer or employee is responsible to report any violation of the Code (whether suspected or known) to the Agency's Executive Director or Chairman of the Agency. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position in the Agency, 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 which may include termination of employment. Regardless, any claim of retaliation will be taken and treated seriously and irrespective of the outcome of the initial report of violation or complaint will be treated as a separate offense.

The Executive Director or the Chairman of the Agency is responsible for immediately forwarding any violation or claim to the Agency's Counsel who shall investigate and handle them in a timely manner.

BROOME COUNTY INDUSTRIAL DEVELOPMENT AGENCY  
WHISTLEBLOWER POLICY

Every member of the Board of Directors (the “Board”) of the Broome County Industrial Development Agency (The Agency) and all officers and employees thereof, in the performance of their duties shall conduct themselves with honesty and integrity and observe the highest standard of business and personal ethics set forth in the Code of Ethics of The Agency (the “Code.”)

Each member, officer or employee is responsible to report any violations of the Code (whether suspected or known) to The Agency’s Executive Director. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position with The Agency, will be subject to any retaliation against someone who has reported a violation, shall be subject to disciplinary action which may include termination of employment. Regardless, any claim 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 Executive Director is responsible for immediately forwarding any claim to The Agency’s counsel who shall investigate and handle the claim in a timely manner.

In accordance with Public Authorities Law Section 2857, no state or local authority shall fire, discharge, demote, suspend, threaten, harass or discriminate against an employee because of the employee’s role as a whistleblower, insofar as the actions taken by the employee are legal.

Approved and Adopted this 21<sup>st</sup> day of August, 2019