BROOME COUNTY LOCAL DEVELOPMENT CORPORATION WHISTLE-BLOWER POLICY

Every member of the Board of Directors (the "Board") of the Broome County Local Development Corporation (Corporation) 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 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 Executive Director or Chairman of the Board of the Corporation. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position in 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, 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 Chairman of the Board of the Corporation is responsible for immediately forwarding any violation or claim to the Corporation'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 18th day of March, 2020