



WHISTLEBLOWER POLICY

It is the responsibility of all Onondaga County Industrial Development Agency (the “Agency”) members, officers and employees to comply with the Agency’s Code of Ethics and to report violations or suspected violations in accordance with this Whistleblower Policy. It is the policy of the Agency 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 is set forth to encourage and enable members, officers and employees to raise concerns in Good Faith within the Agency and without fear of retaliation or adverse employment action.

Definitions

“Good Faith”: Information concerning potential Wrongdoing is disclosed in “Good Faith” when the individual making the disclosure reasonably believes such information to be true and reasonably believes that it constitutes potential Wrongdoing.

“Agency Employee”: All board members, and officers and staff employed at the Agency whether full-time, part-time, employed pursuant to contract, employees on probation and temporary employees.

“Whistleblower”: Any Agency Employee who in Good Faith discloses information concerning Wrongdoing by another Agency Employee, or concerning the business of the Agency itself.

“Wrongdoing”: Any alleged corruption, fraud, criminal or unethical activity, misconduct, waste, conflict of interest, intentional reporting of false or misleading information, or abuse of authority engaged in by a Agency Employee that relates to the Agency.

“Personnel Action”: Any action affecting compensation, appointment, promotion, transfer, assignment, reassignment, reinstatement or evaluation of performance.

Section I: Reporting Wrongdoing

All Agency Employees who discover or have knowledge of potential Wrongdoing concerning board members, officers, or employees of the Agency; or a person having business dealings with the Agency; or concerning the Agency itself, shall report such activity in accordance with the following procedures:

- a) The Agency Employee shall disclose any information concerning Wrongdoing either orally or in a written report to the Agency’s ethics officer or general counsel.

- b) All Agency Employees who discover or have knowledge of Wrongdoing shall report such Wrongdoing in a prompt and timely manner.
- c) The identity of the Whistleblower and the substance of their allegations will be kept confidential to the best extent possible.
- d) The individual to whom the potential Wrongdoing is reported shall investigate and handle the claim in a timely and reasonable manner, which may include referring such information to the Authorities Budget Office or an appropriate law enforcement agency where applicable.
- e) Should an Agency Employee believe in Good Faith that disclosing information within the Agency pursuant to Section 1(a) above would likely subject them to adverse Personnel Action or be wholly ineffective, the Agency Employee may instead disclose the information to State entity.

Section II: No Retaliation or Interference

No Agency Employee shall retaliate against any Whistleblower for the disclosure of potential Wrongdoing, whether through threat, coercion, or abuse of authority; and, no Agency Employee shall interfere with the right of any other Agency Employee by any improper means aimed at deterring disclosure of potential Wrongdoing. Any attempts at retaliation or interference are strictly prohibited and:

- a) No Agency Employee who in Good Faith discloses potential violations of the Agency's Code of Ethics or other instances of potential Wrongdoing, shall suffer harassment, retaliation or adverse Personnel Action.
- b) All allegations of retaliation against a Whistleblower or interference with an individual seeking to disclose potential Wrongdoing will be thoroughly investigated by this Agency.
- c) Any Agency Employee who retaliates against or had attempted to interfere with any individual for having in Good Faith disclosed potential violations of this Agency's Code of Ethics or other instances of potential Wrongdoing is subject to discipline, which may include termination of employment.
- d) Any allegation of retaliation or interference will be taken and treated seriously and irrespective of the outcome of the initial complaint, will be treated as a separate matter.