

**TOWN OF ROTTERDAM INDUSTRIAL DEVELOPMENT AGENCY
WHISTLEBLOWER POLICY**

I. STATEMENT OF PURPOSE

The Town of Rotterdam Industrial Development Agency (“Agency”) 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 the provisions of Chapter 1030 of 1969 Laws of New York, constituting Title 1 of Article 18-A of the General Municipal Law, Chapter 24 of the Consolidated Laws of New York, as amended (the “Enabling Act”) and Chapter 673 of the 1975 Laws of New York, as amended, constituting Section 899-b of said General Municipal Law (said Chapter and the Enabling Act being hereinafter collectively referred to as the “Act”), and any other applicable law.

II. POLICY

Every member of the board (the “Board”) of 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 as 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 Chairman. 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 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. 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 Chairman is responsible for immediately forwarding any claim to the Agency's counsel who shall investigate and handle the claim in a timely manner.