

COUNTY OF OSWEGO

INDUSTRIAL DEVELOPMENT AGENCY

Whistleblower Policy and Procedures

Purpose

It is the policy of County of Oswego Industrial Development Agency (COIDA) to afford certain protections to individuals who in good faith report violations of the COIDA's Code of Ethics or other instances of potential wrongdoing within the COIDA. The Whistleblower Policy and Procedures set forth below are intended to encourage and enable employees to raise concerns in good faith within COIDA 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.

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

“Whistleblower”: Any COIDA Employee (as defined herein) who in good faith discloses information concerning wrongdoing by another COIDA employee or concerning the business of the COIDA 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 COIDA Employee (as defined herein) that relates to the COIDA.

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

Section I: Reporting Wrongdoing

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

- a) The COIDA Employee shall disclose any information concerning wrongdoing either orally or in a written report to his or her supervisor, or to the COIDA's ethics officer, general counsel or human resources representative.
- b) All COIDA 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 his or her 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 a COIDA Employee believe in good faith that disclosing information within the COIDA pursuant to Section 1(a) above would likely subject him or her to adverse personnel action or be wholly ineffective, the COIDA Employee may instead disclose the information to the Authorities Budget Office or an appropriate law enforcement agency, if applicable. The Authorities Budget Office's toll-free number (1-800-560-1770) should be used in such circumstances.

Section II: No Retaliation or Interference

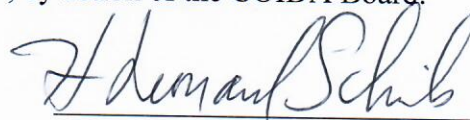
No COIDA Employee shall retaliate against any whistleblower for the disclosure of potential wrongdoing, whether through threat, coercion, or abuse of authority; and, no COIDA Employee shall interfere with the right of any other COIDA Employee by any improper means aimed at deterring disclosure of potential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

- a) No COIDA Employee who in good faith discloses potential violations of COIDA'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 COIDA.
- c) Any COIDA Employee who retaliates against or had attempted to interfere with any individual for having in good faith disclosed potential violations of COIDA'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.

Section III: Other Legal Rights Not Impaired

The Whistleblower Policy and Procedures set forth herein are not intended to limit, diminish or impair any other rights or remedies that an individual may have under the law with respect to disclosing potential wrongdoing free from retaliation or adverse personnel action.

This Policy is adopted the 18th day of June, 2019, by action of the COIDA Board.



H. Leonard Schick, Secretary