

AUBURN LOCAL DEVELOPMENT CORPORATION
WHISTLEBLOWER POLICY

Every member of the board (the “Board”) of the Auburn Local Development Corporation (the “Corporation”) and all officer 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 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 President. Reports of suspected or known violations on the part of the President shall be reported to the Vice-President. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position with the Corporation, will be subject to any retaliation, harassment or adverse personnel action for making a good faith claim. Any board member, officer or employee who chooses to retaliate against someone who has reported a violation shall be subject to disciplinary action, which may include termination of employment or status within the board. 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 President, or the Vice-President in the case of a violation on the part of the President, is responsible for immediately forwarding any claim to the Corporation's counsel who shall investigate and handle the claim in a timely manner.

Should a member, officer or employee believe in good faith that disclosing information to the President or Vice-President pursuant to the paragraphs above would likely subject him or her to adverse personnel action or be wholly ineffective, the individual 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.

Approved and adopted this 17th day of June 2015.