**Village of Green Island**

**Industrial Development Agency**

**Whistleblower Policy and Procedures**

Purpose

It is the policy of this Village of Green Island Industrial Development Agency (“Public Authority”) to afford certain protections to individuals who in good faith report violations of the Public Authority’s Code of Ethics or other instances of potential wrongdoing within the Public Authority. The Whistleblower Policy and Procedures set forth below are intended to encourage
and enable employees to raise concerns in good faith within the Public Authority
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.

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

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

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

Section I: Reporting Wrongdoing

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

a) The Public Authority Employee shall disclose any information
concerning wrongdoing either orally or in a written report to his or her
supervisor, or to the Public Authority’s ethics officer, general counsel or
human resources representative.

b) All Public Authority 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 Public Authority Employee believe in good faith that
disclosing information within the Public Authority pursuant to Section
1(a) above would likely subject him or her to adverse personnel action
or be wholly ineffective, the Public Authority 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 Public Authority Employee shall retaliate against any whistleblower for the
disclosure of potential wrongdoing, whether through threat, coercion, or abuse of
authority; and, no Public Authority Employee shall interfere with the right of any
other Public Authority Employee by any improper means aimed at deterring
disclosure of potential wrongdoing. Any attempts at retaliation or interference are
strictly prohibited and:

a) No Public Authority Employee who in good faith discloses potential
violations of this Public Authority’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 Public Authority.

c) Any Public Authority Employee who retaliates against or had
attempted to interfere with any individual for having in good faith
disclosed potential violations of this Public Authority’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.

a) Specifically, these Whistleblower Policy and Procedures are not
intended to limit any rights or remedies that an individual may have
under the laws of the State of New York, including but not limited to
the following provisions: Civil Service Law § 75-b, Labor Law §
740, State Finance Law § 191 (commonly known as the “False
Claims Act”), and Executive Law § 55(1).

b) With respect to any rights or remedies that an individual may have
pursuant to Civil Service Law § 75-b or Labor Law § 740, any
employee who wishes to preserve such rights shall prior to
disclosing information to a government body, have made a good
faith effort to provide the appointing authority or his or her designee
the information to be disclosed and shall provide the appointing
authority or designee a reasonable time to take appropriate action
unless there is imminent and serious danger to public health or
safety. (See Civil Service Law § 75-b[2][b]; Labor Law § 740[3])