

## **WHISTLEBLOWER POLICY FOR THE AUTHORITY**

**Section 1.** Every member of the Board (the “Board”) of the Ogdensburg Bridge and Port Authority (“Authority”) and all officers and employees thereof, in the performance of their duties shall conduct themselves with honesty and integrity and observe the highest ethical standards of business and personal ethics as set forth in the Code of Ethics of the Authority (the “Code”) .

**Section 2.** Each member, officer, or employee is responsible to report any violation of the Code (whether suspected or known) to the Authority’s Compliance Officer or Executive Director. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position with the Authority 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 in accordance with the Authority’s Disciplinary Policy, which may include termination of employment. Regardless, any claim of retaliation will be taken and treated seriously, irrespective of the outcome of the initial complaint and will be treated as a separate offense.

**Section 3.** The Compliance Officer is responsible for immediately forwarding claims to the Executive Director for investigating and handling the claim in a timely manner.

**Section 4.** The Executive Director will report all findings to the appropriate Committee of the Board.

This policy is not intended to exclude or limit in any manner an individual’s existing rights and protection under Federal and State law.

Approved at December 14, 2016, Board Meeting

