



## **Whistleblower Policy**

Every member of the Board of Directors of the Albany County Business Development Corporation (ACBDC), and all employees of the Advance Albany County Alliance, LDC (Alliance) acting on behalf of the ACBDC and the Alliance under an Agency Agreement by and between the ACBDC and the Alliance, in the performance of their respective duties, shall conduct themselves with honesty and integrity and observe the highest standard of business and personal ethics as set forth in the ACBDC Code of Ethics (Code).

Each member, officer or employee is responsible to report any violation of the Code (whether suspected or known) to the ACBDC Board Chairperson (ACBDC Chair). In the event the suspected or known violation involves the ACBDC Board Chair, the report of such violation shall be made to counsel of the ACBDC. Reports of violations will be kept confidential to the extent possible.

No individual, regardless of their position with the ACBDC, will be subject to any retaliation for making a good faith claim, and any member, officer or employee who chooses to retaliate against someone who has reported a violation shall be subject to disciplinary action, which may include (a) in the case of an employee of the Alliance, removal from service to the ACBDC, and (b) in the case of an ACBDC Board member, removal from the Board in accordance with the by-laws of the ACBDC. 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 ACBDC Board Chair is responsible for immediately forwarding any claim to the ACBDC's corporate counsel, who shall investigate the claim in a timely manner and report the results and a recommendation for handling to the ACBDC Board Chair (or if the suspected or known violation involves the Board Chair, then the Vice-Chairperson or Treasurer of the ACBDC Board, as appropriate in the best judgement of counsel).

In the event any member, officer or employee believes in good faith that disclosing information within the ACBDC as set forth above would likely subject such person to adverse action or be wholly ineffective, such individual may instead disclose the information to the New York State Public Authorities Budget Office at 1 (800) 560-1770.

ACBDC shall not fire, discharge, demote, suspend, threaten, harass or discriminate against a member, officer or employee because of such member's, officer's or employee's role as a whistleblower, insofar as the actions taken by such member, officer, or employee are legal.