**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])