

WHISTLE BLOWER POLICY

Adopted July 12, 2011

Scope

Section 2824 of the Public Authorities Reform Act of 2009 requires the Cheektowaga Economic Development Corporation (the Corporation) to establish written policies and procedures concerning the protection of Whistleblowers.

Applicability

This policy shall apply to the Corporation=s Board of Directors, Officers, Members and any other affiliated entities that may be established by the Corporation.

Definition

A Whistleblower shall mean any Board of Directors, Officers, Member of the Corporation who discloses information concerning acts of wrongdoing, misconduct, malfeasance, or other inappropriate behavior by a Board of Directors, Officers or Member of the Corporation, concerning the Corporation=s investments, travel, acquisition of real or personal property, the disposition of real or personal property and the procurement of goods and services.

Actions by an Authority

Pursuant to the Public Authorities Reform Act of 2009 the Corporation shall not fire, discharge, demote, suspend, threaten, harass or discriminate against an Director, Officer of Member of the Corporation because of the employee=s role as a whistleblower, insofar as the actions taken by the employee are legal.

Communications with the Authorities Budget Office (ABO)

Any communications between a Director, Officer or Member of the Corporation and the ABO pursuant to Public Authorities Reform Act of 2009 shall be held strictly confidential by the authorities budget office, unless the employee specifically waives in writing the right to confidentiality, except that such confidentiality shall not exempt the authorities budget office from disclosing such information, where appropriate, to the state Inspector General in accordance with section fifty-five of the executive law, or prevent disclosure to any law enforcement authority.

Reporting Unethical Behavior

Officers, Directors and Members are required to report possible unethical behavior by a Director, Officer or Member of the Corporation to the Ethics Officer. Directors, Officers and Members may file ethics complaints anonymously and are protected from retaliation by the policies adopted by the Corporation.