# THE NORTH COUNTRY ALLIANCE

# LOCAL DEVELOPMENT CORPORATION

**WHISTLEBLOWER POLICY**

Every member of the board (the “Board”) of The North Country Alliance Local Development Corporation (the “Corporation”) and all officers and employees, if applicable, thereof, in the performance of their duties shall conduct themselves with honesty and integrity and observe the highest standards of business and personal ethics as set forth in the Code of Ethics of the Corporation (the “Code”).

Each member, officer or employee, if applicable, is responsible to report any violation of the Code (whether suspected or known) to the Corporation’s Board President. In the event the suspected or know violation involves the Corporation’s Board President, the report of such violation shall be made to any member of the Corporation’s Board of Directors. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position with the Corporation, will be subject to any retaliation for making a good faith claim, and any employee, if applicable, who chooses to retaliate against someone who has reported a violation shall be subject to disciplinary action, which may include termination of employment. Regardless, any claim of retaliation will be taken and treated seriously and irrespective of the outcome of the initial compliant, will be treated as a separate offense.

The President or member of the Board in which the violation was made aware of, as the case may be, is responsible for immediately forwarding any claim to the Corporation’s counsel who shall investigate the claim in a timely manner and report the results and a recommendation for handling to the President or the Board of Directors, as appropriate in the best judgment of counsel.

In the event any member, officer, or employee, if applicable, believes in good faith that disclosing information within the Corporation as set forth above would likely subject him or her to adverse action or be wholly ineffective, such individual may instead disclose the information to the Authorities Budget Office at 1-800-560-1770.

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| Action | Date |
| Adopted | 2/10/2010 |
| Substantially revised, adopted | 2/21/2018 |