

**Olean Local Development Corporation
101 East State Street
Olean, NY 14760**

WHISTLEBLOWER POLICY

Every officer, board member or employee of the Olean Local Development Corporation (OLDC), in the performance of his/her 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 OLDC.

Each officer, board member or employee is responsible to report any violation of the Code (whether suspected or known) to the Board's President. Reports of violations will be kept confidential to the extent possible. No individual, regardless of his/her position with the OLDC, will be subject to any retaliation for making a good faith claim, and any officer, board member or employee who chooses to retaliate against someone who has reported a violation shall be subject to disciplinary action which may include termination of employment, if applicable. Regardless, 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 President is responsible for immediately forwarding any claim to the OLDC's counsel who shall investigate and handle the claim in a timely manner.

The question of the adoption of the foregoing policy was duly put to vote on roll call, which resulted as follows:

	Yea	Nay	Abstain	Absent
Brian O'Connell				
Colleen Taggerty				
John Sayegh				
Ann McLaughlin				
Tom Windus				
Mary George				

This policy is hereby adopted and shall be effective immediately as approved and adopted this day of , 2013.