

Greater Rochester Outdoor Sports Facility Corporation Whistleblower Policy

Adopted: March 20, 2012
Re-Adopted: March 19, 2013
Re-Adopted: March 18, 2014
Re-Adopted: March 17, 2015
Re-Adopted: March 16, 2016
Re-Adopted: March 21, 2017

1. This policy is to protect the Greater Rochester Outdoor Sports Facility Corporation ("Corporation") employees including employees of the resident contractors who make allegations to officials of the Corporation of illegal activity or misconduct.
2. Illegal activity or misconduct is any action by an officer or an employee of the Corporation or resident contractors which is undertaken on behalf of the Corporation in violation of any federal, state or local law, rule or regulation.
3. Any Corporation employee including employees of the resident contractors may in good faith provide information on any matter involving illegal activity or misconduct to the Chairman of the Corporation or any member of the Corporation who shall conduct such investigation or cause such investigation to be conducted as may be appropriate. In conducting an investigation, best efforts shall be used to keep confidential the identity of the person providing the information which initiated the investigation, unless it is determined the information was provided other than in good faith. The result of any investigation shall be reported to such other authority as the investigating authority deems appropriate.
4. No Corporation officer or employee including those of the resident contractors, may, directly or indirectly, use or attempt to use his/her official authority or influence for the purpose of intimidating, threatening, coercing, commanding, influencing or attempting to intimidate, threaten, coerce, command or influence any individual for the purpose of interfering with the right of such individual to disclose information relative to illegal activity or misconduct. Pursuant to this section, "use or attempt to use official authority to influence" includes promising to confer or conferring any benefit or threatening to effect any reprisal.