



REDCO Whistleblower Policy

October 16, 2019

A. Preamble:

Whistle Blower protection is a safeguard for all REDCO officers, Directors and employees to prevent against retaliatory actions that could be taken against a REDCO officer, Director or employee for reporting fraud, waste, abuse, misconduct, or any alleged prohibited or illegal activity in violation of any law, rule or regulation, or Code of Ethics of REDCO. This policy is intended to protect officers, Directors and employees from retaliation who, in good faith, have reported a concern of improper action.

B. Definitions:

When used in this Policy the following words and phrases shall have the following meaning:

1. Director: any member of the REDCO Board of Directors
2. Employee - any individual who is employed by REDCO, City staff who assists REDCO, either fulltime or part-time or on a contractual basis
3. Good Faith Report -A report of activity which the officer, Director, or employee has reasonable grounds to believe to be true and which the Officer, Director or employee reasonably believes constitutes improper governmental action, even if the belief should later prove to be unsubstantiated.
4. Improper Action -Any action taken by REDCO or another REDCO officer, Director or employee in the performance of the officer's, Director's or employee's official duties, whether or not such action is within the scope of his or her employment, and which is in violation of any federal, state or local law, rule or regulation.
5. REDCO: Rochester Economic Development Corporation
6. Retaliation - Disciplinary or other adverse personnel action relating to the terms and conditions of appointment or employment taken against an officer, Director or employee because the officer, Director or employee has made a good faith report.

C. Scope

All REDCO officers, Directors and employees

D. Policy:

Retaliation

REDCO shall take no retaliatory action against an officer, Director or employee because the officer, Director or employee makes a good faith report of any information regarding fraud, waste, abuse, misconduct, or any alleged prohibited or illegal activity in violation of any law, rule or regulation governing officers, Directors and employees of REDCO.

Confidentiality

Reports of concerns will be kept confidential to the extent possible, consistent with the need to conduct a complete and fair investigation.

Dedicated Contact Person

REDCO will identify an independent member of the Board of Directors who is not employed by nor appointed or elected to any position with the City of Rochester or the Rochester City Council. The Board of Directors shall elect the Dedicated Contact Person. The name, address, telephone number, and e-mail address of the Dedicated Contact Person will be provided to all Officers, Directors, and employees of REDCO.

E. Procedure:

In reporting concerns, officers, employees and Directors should make the good faith report to the Designated Contact Person.