

OPERATION OSWEGO COUNTY, INC.

Whistleblower Policy and Procedures

Purpose

It is the policy of Operation Oswego County, Inc. (OOC) to afford certain protections to individuals who in good faith report violations of the OOC's Code of Ethics or other instances of potential wrongdoing within the OOC. The Whistleblower Policy and Procedures set forth below are intended to encourage and enable employees to raise concerns in good faith within OOC and without fear of retaliation or adverse employment action.

Definitions

“Good Faith”: Information concerning potential wrongdoing is disclosed in “good faith” when the individual making the disclosure reasonably believes such information to be true and reasonably believes that it constitutes potential wrongdoing.

“OOC Employee”: All board members, and officers and staff employed at OOC whether full-time, part-time, employed pursuant to contract, employees on probation and temporary employees.

“Whistleblower”: Any OOC Employee (as defined herein) who in good faith discloses information concerning wrongdoing by another OOC employee, or concerning the business of the OOC itself.

“Wrongdoing”: Any alleged corruption, fraud, criminal or unethical activity, misconduct, waste, conflict of interest, intentional reporting of false or misleading information, or abuse of authority engaged in by a OOC Employee (as defined herein) that relates to the OOC.

“Personnel action”: Any action affecting compensation, appointment, promotion, transfer, assignment, reassignment, reinstatement or evaluation of performance.

Section I: Reporting Wrongdoing

All OOC Employees who discover or have knowledge of potential wrongdoing concerning board members, officers, or employees of OOC; or a person having business dealings with OOC; or concerning OOC itself, shall report such activity in accordance with the following procedures:

- a) The OOC Employee shall disclose any information concerning wrongdoing either orally or in a written report to his or her supervisor, or to the OOC's ethics officer, general counsel or human resources representative.
- b) All OOC Employees who discover or have knowledge of wrongdoing shall report such wrongdoing in a prompt and timely manner.
- c) The identity of the whistleblower and the substance of his or her allegations will be kept confidential to the best extent possible.
- d) The individual to whom the potential wrongdoing is reported shall investigate and handle the claim in a timely and reasonable manner, which may include referring such information to the Authorities Budget Office or an appropriate law enforcement agency where applicable.

e) Should a OOC Employee believe in good faith that disclosing information within the OOC pursuant to Section 1(a) above would likely subject him or her to adverse personnel action or be wholly ineffective, the OOC Employee may instead disclose the information to the Authorities Budget Office or an appropriate law enforcement agency, if applicable. The Authorities Budget Office's toll free number (1-800-560-1770) should be used in such circumstances.

Section II: No Retaliation or Interference

No OOC Employee shall retaliate against any whistleblower for the disclosure of potential wrongdoing, whether through threat, coercion, or abuse of authority; and, no OOC Employee shall interfere with the right of any other OOC Employee by any improper means aimed at deterring disclosure of potential wrongdoing. Any attempts at retaliation or interference are strictly prohibited and:

- a) No OOC Employee who in good faith discloses potential violations of OOC's Code of Ethics or other instances of potential wrongdoing, shall suffer harassment, retaliation or adverse personnel action.
- b) All allegations of retaliation against a Whistleblower or interference with an individual seeking to disclose potential wrongdoing will be thoroughly investigated by OOC.
- c) Any OOC Employee who retaliates against or had attempted to interfere with any individual for having in good faith disclosed potential violations of OOC's Code of Ethics or other instances of potential wrongdoing is subject to discipline, which may include termination of employment.
- d) Any allegation of retaliation or interference will be taken and treated seriously and irrespective of the outcome of the initial complaint, will be treated as a separate matter.

Section III: Other Legal Rights Not Impaired

The Whistleblower Policy and Procedures set forth herein are not intended to limit, diminish or impair any other rights or remedies that an individual may have under the law with respect to disclosing potential wrongdoing free from retaliation or adverse personnel action.

This Policy is adopted the 22nd day of September, 2015, by action of the OOC Board.

This policy has been reviewed and ratified by the Board of Directors at its meeting held on March 20, 2023.

Peter Cullinan
Secretary