



## 120 Whistleblower Policy (See Policy 504 in the Employee Handbook)

**Policy Statement** – Finger Lakes Visitors Connection Confidentiality, Personal Conduct, and Ethics policies require the Board of Directors, senior management, supervisors, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Company, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It is the responsibility of all members of the Board of Directors, and all employees, to comply with these policies, and to report violations or suspected violations of the law in accordance with this Whistleblower policy.

**Policy Distribution** - As required by the NYS Revitalization Act of 2013, a copy of the Whistleblower policy will be distributed to all Directors, Officers, employees, and volunteers who provide substantial services to the Company.

**No Retaliation** - An employee who reasonably believes that some policy, practice, or activity of the Company is in violation of law or is an ethics violation, and reports such activity in good faith, shall not suffer harassment, retaliation or adverse employment consequence of any kind. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower policy is intended to encourage and enable employees and others to raise concerns within the Company prior to seeking resolution externally.

**Reporting Violations** – Finger Lakes Visitors Connection has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is the best individual for this purpose. However, if an employee is not comfortable speaking with their supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Chair of the Board. For suspected fraud, or when not satisfied or uncomfortable with following the Agency's open-door policy, or if the complaint concerns the CEO, individuals should contact the Chair of the Board of Directors. Finger Lakes Visitors Connection will investigate all complaints, including those made anonymously.

**Acting in Good Faith** - Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be

substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**Confidentiality** - Violations or suspected violations of law may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations** – The President is responsible for investigating and resolving all reported complaints and allegations concerning violations of law or ethics breaches. The Chair of the Board will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. If the complaint concerns the President, the Chair of the Board of Directors will notify the sender and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate disciplinary action will be taken if warranted by the investigation.

Date: April 29, 2009

Updated: October 6, 2021