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1. **Whistleblower Policy (**See Policy 504 in the Employee Handbook)

**Policy Statement** -Finger Lakes Visitors Connection's 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.

**No** **Retaliation** - The Company will not take any retaliatory action against an employee, whether or not within the scope of the employee’s job duties, because such employee does any of the following:

(a) discloses, or threatens to disclose to a supervisor or to a public body an activity, policy or practice of the employer that the employee reasonably believes is in violation of law, rule or regulation or that the employee reasonably believes poses a substantial and specific danger to the public health or safety;

(b) provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into any such activity, policy or practice by such employer; or

(c) objects to, or refuses to participate in any such activity, policy or practice.

**Reporting** **Violations** - **Reporting** **Violations** - Finger Lakes Visitors Connection will investigate all complaints, including those made anonymously. Where the employee wishes to disclose a violation to a public body, the employee must first make a good faith effort to notify their supervisor and provide Finger Lakes Visitors Connection a reasonable opportunity to correct such activity, policy or practice. Notification to a supervisor is not required where:

(a) there is an imminent and serious danger to the public health or safety;

(b) the employee reasonably believes that reporting to the supervisor would result in a destruction of evidence or other concealment of the activity, policy or practice;

(c) such activity, policy or practice could reasonably be expected to lead to endangering the welfare of a minor;

(d) the employee reasonably believes that reporting to the supervisor would result in physical harm to the employee or any other person; or

(e) the employee reasonably believes that the supervisor is already aware of the activity, policy or practice and will not correct such activity, policy or practice.

**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.

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