

## ROCHESTER LAND BANK CORPORATION WHISTLEBLOWER POLICY

Every director, officer, or employee of the Corporation, and every member of the Board of Directors of Rochester Land Bank Corporation, in the performance of his or her duties shall conduct himself or herself with honesty and integrity and observe the highest standards of business and personal ethics as set forth in the <a href="City of Rochester Code">City of Rochester Code of Ethics</a>.

Each director, officer or employee is responsible to report any violation of the Code (whether suspected or known) to the Corporation's Chair. Reports of violations will be kept confidential to the extent possible. No individual, regardless of his or her position with the Corporation, shall be subject to any retaliation for making good faith claim, and any employee who retaliates against one who has reported a violation shall be subject to disciplinary action, which may include termination of employment. Any claim of retaliation shall be investigated in good faith and notwithstanding the outcome of an initial complaint, shall be treated as a separate offense.

The Chair is responsible for immediately forwarding any claim of retaliation to the Corporation Counsel who shall investigate and handle such claim in a timely manner.