Emerald Corporate Center Economic Development Corporation of Sullivan County

Whistleblower Policy

Every member of the board(the "Board") of the Emerald Corporate Center Economic Development Corporation (the "Corporation") and all officer and employees thereof, in the performance of their duties shall conduct themselves with honesty and integrity and observe the highest standards of business and personal ethics as set forth in the Code of Ethics of the Corporation(the "Code")

Each member, officer, or employee is responsible to report any violation of the Code (whether suspected or known) to the Corporation's President. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position with the Corporation, will be subject to any retaliation for making a good faith claim and, shall be subject to disciplinary action which may in clued termination of employment. Regardless, any claim of retaliation will be taken seriously and irrespective of the outcome of the initial complaint, will be treated as a separate offense.

The President is responsible for immediately forwarding any claim to the Corporation's counsel who shall investigate and handle the claim in a timely manner.

Approved and adopted this 12 day of December 2012