



Syracuse Regional Airport Authority **Whistleblower Policy and Procedures**

Section 101. Purpose

The Syracuse Regional Airport Authority (the “Authority”) requires members, officers, staff and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. It is the policy of the Authority to afford certain protections to individuals who in good faith report violations of the Authority’s Code of Ethics or other instances of potential wrongdoing within the Authority. The Whistleblower Policy and Procedures set forth below are intended to encourage and enable members, officers, staff and employees to raise concerns in good faith within the Authority and without fear of retaliation or adverse employment action.

Section 102. Reporting Responsibility

It is the responsibility of all members, officers, staff and employees of the Authority to comply with the Code of Ethics and report violations or suspected violations of the Authority’s Code of Ethics or other instances of potential wrongdoing to the Ethics Officer, in accordance with this Whistleblower Policy.

Section 103. Definitions

Unless otherwise specifically indicated in the Authority’s Whistleblower Policy and Procedures, the following words and phrases shall be defined as follows:

“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.

“Authority Employee” shall mean all Authority members and officers and staff employed at the Authority whether full-time, part-time, employed pursuant to contract, employees on probation and temporary employees.

“Whistleblower” shall mean any Authority Employee, as defined herein, who in good faith discloses information concerning wrongdoing by another Authority employee, or concerning the business of the Authority itself.

“wrongdoing” shall mean 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 an Authority Employee, as defined herein, that relates to the Authority.

“personnel action” shall mean any action affecting compensation, appointment, promotion, transfer, assignment, reassignment, reinstatement or evaluation of performance.

Section 104. Reporting Wrongdoing

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

1. The Authority Employee shall disclose any information concerning wrongdoing, either orally or in a written report, to his or her supervisor, or to the Authority’s ethics officer, general counsel or human resources representative.

2. All Authority Employees who discover or have knowledge of wrongdoing shall report such wrongdoing in a prompt and timely manner.

3. The identity of the Whistleblower and the substance of his or her allegations will be kept confidential to the best extent possible.

4. The individual to whom the potential wrongdoing is reported shall refer the reported potential wrongdoing to the Authority Ethics Officer who 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.

5. Should an Authority Employee believe in good faith that disclosing information within the Authority pursuant to Section 104(1) above would likely subject him or her to an adverse personnel action or be wholly ineffective, the Authority 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 105. No Retaliation or Interference

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

1. No Authority Employee who in good faith discloses potential violations of this Authority’s Code of Ethics or other instances of potential wrongdoing, shall suffer harassment, retaliation or adverse personnel action.

2. All allegations of retaliation against a Whistleblower or interference with an individual seeking to disclose potential wrongdoing will be thoroughly investigated by the Authority's Ethics Officer.

3. Any Authority Employee who retaliates against or had attempted to interfere with any individual for having in good faith disclosed potential wrongdoing is subject to discipline, which may include termination of employment.

4. 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 106. Discipline For Reports Not Made In Good Faith and False Reports

Nothing herein protects an Authority Employee from being disciplined where he or she does not in good faith report potential wrongdoing or he or she maliciously or knowingly makes false allegations of potential wrongdoing. Any reports of potential wrongdoing that are determined to not have been made in good faith or made maliciously or knowingly to be false shall be treated as a serious offense of the Authority's work rules.

Section 107. Ethics Officer

The Authority has appointed an Ethics Officer, who shall be responsible for investigating, and, where appropriate, resolving all reported complaints and allegations concerning violations of the Authority's Ethics Code or other instances of potential wrongdoing. The Authority Ethics Officer will also investigate and, where appropriate, resolve complaints and allegations of retaliation and interference. The Authority Ethics Officer will advise the Audit Committee of any complaints or allegations involving fraud, internal controls, accounting or auditing matters and the results of that investigation.

Section 108. Suspected Fraud, Accounting and Audit Matters

The Audit Committee of the Authority shall address all reported concerns or complaints regarding Authority accounting practices, internal controls, suspected fraud or auditing. The Chair of the Audit Committee shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

Section 109. Other Legal Rights Not Impaired

The Syracuse Regional Airport Authority 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.

1. Specifically, the Authority's Whistleblower Policy and Procedures are not intended to limit any rights or remedies that an individual may have under the laws of the State of New York, including but not limited to the following provisions: Civil Service Law § 75-b,

Labor Law § 740, State Finance Law § 191 (commonly known as the “New York False Claims Act”), and Executive Law § 55(1).

2. With respect to any rights or remedies that an individual may have pursuant to New York Civil Service Law § 75-b or New York Labor Law § 740, any Authority Employee who wishes to preserve such rights shall prior to disclosing information to a government body, have made a good faith effort to provide the appointing authority or his or her designee the information to be disclosed and shall provide the appointing authority or designee a reasonable time to take appropriate action unless there is imminent and serious danger to public health or safety. (See New York Civil Service Law §75-b [2] [b]; New York Labor Law §740 [3]).

Adopted: January 13, 2012

Resolution No.: 1