

JEFFERSON COUNTY LOCAL DEVELOPMENT CORPORATION
WHISTLEBLOWER POLICY

Adopted 09/03/09
Amended 12/01/11
Reviewed 10/01/20

Every member of the board (the "Board") of the Jefferson County Local 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 Chief Executive Officer. In the event the suspected or known violation involves the Corporation's Chief Executive Officer, the report of such violation shall be made to the Corporation's Chairman. 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 any employee who chooses to retaliate against someone who has reported a violation shall be subject to disciplinary action, which may include termination of employment. Regardless, any claim of retaliation will be taken and treated seriously and irrespective of the outcome of the initial complaint, will be treated as a separate offense.

The Chief Executive Officer or the Chairman, as the case may be, is responsible for immediately forwarding any claim to the Corporation's counsel who shall investigate the claim in a timely manner and report the results and a recommendation for handling to the Chief Executive Officer, Chairman or Executive Committee, as appropriate in the best judgment of counsel.

In the event any member, officer or employee believes in good faith that disclosing information within the Corporation as set forth above would likely subject him or her to adverse action or be wholly ineffective, such individual may instead disclose the information to the Authorities Budget Office at 1-800-560-1770.