

Mohawk Valley Water Authority Whistleblower Policy

General

The Mohawk Valley Water Authority Code of Ethics requires directors, officers 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 Authority, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

As part of our ethical responsibility, violation of laws and regulations while performing company duties and responsibilities should be reported to the immediate supervisor, comptroller, director or officer. Violations of laws and regulations may include, but certainly not be limited to, fraud, dishonesty, theft, cheating and misuse of information, property or equipment.

Fraud is the intentional act by an individual or a group of individuals (referred to as collusion) to deceive another by false acts, suggestions or suppression of the truth. It includes all surprises, tricks or dissembling and any unfair way which another individual or the organization is cheated.

Fraud may take the form of misuse or misappropriation of company assets including embezzlement, theft, stealing or the misuse of information to personally benefit. Fraud may also include causing the company to pay for goods or services not received (or pay inflated prices for goods received.)

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with the Code of Ethics and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer or employee who in good faith reports a violation of the Code of Ethics shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Authority prior to seeking resolution outside the Authority.

Reporting Violations

The Code of Ethics addresses the Authority's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Authority's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Authority's open door policy, individuals should contact the Authority's Compliance Officer directly.

Compliance Officer

The Compliance Officer is the Director of Human Relations. The Authority's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code of Ethics and will report all allegations to the Chairman of the Board. The Compliance Officer has direct access to the Chairman of the Board in these matters.

Chairman of the Board

The Chairman of the Board will inform other board and staff members as he deems necessary to conduct an appropriate investigation. The Chairman has the authority to provide funds for investigations as required.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code of Ethics must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Ethics. 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 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.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Mohawk Valley Water Authority Management