

**WATERTOWN INDUSTRIAL CENTER**  
**LOCAL DEVELOPMENT CORPORATION**

**WHISTLEBLOWER POLICY**

Adopted: June 21, 2011  
Reviewed and Amended: June 19, 2012  
Reviewed and Amended: July 23, 2013  
Reviewed and Accepted: June 17, 2014  
Reviewed and Accepted: June 23, 2015  
Reviewed and Accepted: June 21, 2016

Every member of the board (the “Board”) of the Watertown Industrial Center Local Development Corporation (the “Corporation”) and all officers and employees (if applicable) 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 Director of Site Facilities. In the event the suspected or known violation involves the Corporation’s Director of Site Facilities, the report of such violation shall be made to any member of the Corporation’s Board of Directors. 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 (if applicable) 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 Director of Site Facilities or the member of the board in which the violation was made aware of, 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 Director of Site Facilities or the Board of Directors, as appropriate in the best judgment of counsel.

In the event any member, officer or employee (if applicable) 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.