

GRIFFISS LOCAL DEVELOPMENT CORPORATION

WHISTLEBLOWER POLICY

Adopted as of August 26, 2010

Reaffirmed March 28, 2013

All members of the Board of Directors (the "Board") of Griffiss Local Development Corporation ("GLDC"), and all officers, employees and authorized representatives of GLDC, 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 GLDC's policies and procedures including its Code of Ethics and its Conflict of Interest and Confidentiality Policy (collectively, "GLDC's Policies") as well as in all applicable laws, rules and regulations (the "Applicable Legal Requirements").

Each member of the Board, officer, employee and authorized representative is responsible to make a complaint (each, individually a "Complaint" and, collectively, the "Complaints") with respect to any suspected or known violation of GLDC's Policies and/or Applicable Legal Requirements. Anyone making a Complaint must be acting in good faith and have a reasonable basis for making such Complaint. Complaints shall be made to GLDC's Chairperson. To the extent that a Complaint involves GLDC's Chairperson, the Complaint shall be made to GLDC's Vice Chairperson. Complaints shall be kept confidential to the extent possible. No director, officer, employee or authorized representative of GLDC who, acting in good faith and having a reasonable basis therefor, makes a Complaint, shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who, acting in good faith and with a reasonable basis therefor, makes a Complaint, is 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 Complaint, will be treated as a separate offense. Any Complaint that proves to be unsubstantiated and to have been made in bad faith and without a reasonable basis therefor, will be viewed as a serious disciplinary offense.

The Chairperson or the Vice Chairperson, as the case may be, is responsible for immediately forwarding any Complaint to GLDC's counsel who shall investigate and handle the Complaint in a timely manner.