## WHISTLEBLOWER POLICY

Every director, officer or employee of the Niagara Falls Water Board (the "NFWB"), 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 NFWB, Chapter 43-A, Article 5, Title 10-B, Section 1230-v and Article 9 of the Public Authorities Law of the State of New York (the "Code").

Each director, officer or employee is responsible to report any violation of the Code (whether suspected or known) to the Executive Director of the NFWB. Reports of violations will be kept confidential to the extent possible. No individual, regardless of their position with the NFWB, 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 Executive Director is responsible for immediately forwarding any claim to the NFWB's legal counsel who shall investigate and handle the claim in a timely manner.

240929 1489328.1 2/15/2011 11:13 am