

TOWN OF ERWIN INDUSTRIAL DEVELOPMENT AGENCY

WHISTLEBLOWER POLICY

Every member of the Board (the “Board”) of the Town of Erwin Industrial Development Agency (the “Agency”), and all officers 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 Agency (the “Code”).

Each member, officer, or employee is responsible to report any violation of the Code (whether suspected or known) to the Agency’s Chief Executive Officer. Reports of violations will be kept confidential to the extent possible. No individual, regardless of his/her position with the Agency, 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 included 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 is responsible for immediately forwarding any claim to the Agency’s counsel, who shall investigate and handle the claim in a timely manner.

Each member, officer, or employee is responsible to report any violation of the Code (whether suspected or known), in regards to the Chief Executive Officer to the Agency’s Chairman.