

ST. LAWRENCE COUNTY
PROPERTY DEVELOPMENT CORPORATION
Res. No. PDC-23-03-03
March 30, 2023

Approved and Adopted: July 19, 2018
Governance Committee Review: March 30, 2023

WHEREAS, the St. Lawrence County Property Development Corporation has caused to be conducted a review of its Whistleblower Policy and Procedures, and

THEREFORE, BE IT RESOLVED, that the St. Lawrence County Property Development Corporation authorizes the following policy:

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| Whistleblower Policy and Procedures |
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Every Director of the St. Lawrence County Property Development Corporation (the “Corporation”) and all officer 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 Corporation (the “Code”).

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

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|-------------|------------|------------|----------------|---------------|
| Move: | LaBaff | | | |
| Second: | Reagen | | | |
| VOTE | AYE | NAY | ABSTAIN | ABSENT |
| Blevins | | | | X |
| Hall | X | | | |
| LaBaff | X | | | |
| McMahon | | | | X |
| Morrill | X | | | |
| Reagen | X | | | |
| Staples | X | | | |

I HEREBY CERTIFY that I have compared this copy of this Resolution with the original record in this office, and that the same is a correct transcript thereof and of the whole of said original record.

/s/

Lori Sibley
March 30, 2023