

ORANGE COUNTY WATER AUTHORITY

WHISTLEBLOWER PROTECTION POLICY

By Order of the Board of Directors of the Orange County Water Authority, this Whistleblower Protection Policy shall apply to all officers, directors and employees of the Orange County Water Authority.

Section 1. Purpose.

This Whistleblower Protection Policy is issued pursuant to Public Authorities Law §2824 to support and implement the Authority's commitment to integrity and ethical conduct in all business dealings. This policy provides the mechanisms whereby officers, directors, employees and others can report a potential violation of law or the Code of Ethics in good faith to those who can assist them, confidentially and without fear of retaliation.

Section 2. Policy.

The Water Authority prohibits retaliation, discrimination, harassment or any other adverse action taken against any individual who reports a potential violation of law or of the Water Authority's Code of Ethics, in good faith. Anyone believing that he or she has been subjected to retaliation for reporting a potential violation in good faith should report such conduct to the Executive Director or to Water Authority counsel, or anyone designated to receive reports under this Whistleblower Protection Policy.

The Water Authority also prohibits retaliation, discrimination, harassment or other adverse action against any person who participates, in any way, in the investigation of a potential violation.

Unless a judicial or other legal process compels otherwise, the identity of any person reporting a potential violation in good faith or a retaliatory action against a reporter or a participant in an investigation shall remain confidential, and shall only be disclosed to those individuals with a need to know as determined by the reporting system described below.

Section 3. The Reporting System.

Any individual may report to the Executive Director any activity or conduct in violation of any Water Authority policy or any federal, state or local laws or regulations pertaining to compliance related matters. Examples include, but are not limited to:

- financial wrongdoing, including fraud or suspected fraud;
- falsification of records;
- criminal conduct of any kind;
- favoritism or bias in contractual matters;

- any form of retaliation against employees, contractors, agents or others, reporting a potential violation in good faith;
- any other good faith concern.

The Executive Director may investigate the matter or refer the report to Water Authority counsel for an impartial investigation.

Section 4. Remedies.

The Executive Director or his designee must report the results of his investigation to the Board of Directors of the Water Authority, which has the authority to impose any remedy that it deems just and appropriate.

Adopted: May 14, 2008