



POLICY AND PROCEDURE MEMO

SUBJECT: ETHICS AND COMPLIANCE PROGRAM

NO. 2.010
DATE: 10-18-13 Approved
9-27-21 Revised

DocuSigned by:
Blaine Cox
B4E9B7BC7D0C4EB
CITY MANAGER

I. STATEMENT:

The City of Rochester's Ethics & Compliance Program (also referred to as Compliance Program) has been instituted to ensure that all representatives of the City of Rochester are aware of the City's mandate to conduct all its services with the highest level of integrity and ethical standards.

The Program shall be tailored to the City's varied operations and service centers in order to effectively exercise due diligences in seeking to detect and prevent fraud, waste and other illegal and unethical activity by city employees, volunteers and other representatives.

Additionally, the City of Rochester will transact its business in compliance with all State and Federal laws, rules and regulations.

II. DEFINITIONS

Chief Ethics & Compliance Office: Office charged with implementation, administration, and oversight of the Ethics & Compliance Program.

Ethics & Compliance Committee: Works with the Ethics & Compliance Office to assure that legal requirements and risks are assessed properly; review and assess adherence to policies and procedures (PPMs); monitor internal systems to PPMs; determine the appropriate strategy to promote compliance and develop a system to solicit, evaluate and respond to complaints and problems.

Hotline: A common reporting system, administered in-house, giving anonymous telephone and email access to employees seeking to report possible instances of wrongdoing.

Compliance: Adherence to the laws and regulations passed by official regulating bodies as well as general principles of ethical conduct.

III. PROCEDURE

A. Designation of Chief Ethics & Compliance Officer and Compliance Structure:



POLICY AND PROCEDURE MEMO

SUBJECT: ETHICS AND COMPLIANCE PROGRAM

NO. 2.010
DATE: 10-18-13 Approved
9-27-21 Revised

DocuSigned by:

Blaine Cox

CITY MANAGER

The City of Rochester's City Manager will serve as the Chief Ethics and Compliance Officer and is responsible for oversight and implementation of the Ethics & Compliance Program.

B. Designation of the Ethics & Compliance Committee:

The City Manager, Deputy City Managers, Mayor and Deputy Mayor shall form the Ethics & Compliance Committee.

C. Development of Standards and written policies and procedures:

The Ethics & Compliance Program sets the precedent for all City representatives and provides reasonable expectations of legal and ethical behavior. The City Manager shall develop and update the Ethics & Compliance Program on an as-needed basis.

D. Compliance Education and Training:

Formal ethics and compliance training shall be integral part of the Ethics & Compliance Program.

E. Auditing, Monitoring and Risk Assessment:

The City of Rochester will identify various methods to detect if unethical or illegal conduct has occurred as it relates to its representatives.

F. Ethics Hotline:

The City encourages individual responsibility for immediately reporting any activity by any City representative that reasonably appears to violate applicable laws or regulations or corporate ethics & compliance requirements by reactively posting information for contacting the City with concerns, complaints and requests for guidance through its hotline at 603-509-1905 or emailing Compliance@RochesterNH.net.

G. Response and Prevention:

All City representatives have responsibility to immediately report violations to the City's Ethics & Compliance Hotline (PPM #2.011). They



POLICY AND PROCEDURE MEMO

SUBJECT: ETHICS AND COMPLIANCE PROGRAM

NO. 2.010
DATE: 10-18-13 Approved
9-27-21 Revised

DocuSigned by:

Blaine Cox

84F8B7B07B684EB...

CITY MANAGER

will receive whistleblower protection(s) not only under the City policy, but also under applicable State and Federal laws.

Whistleblower protection DOES NOT extend to those who are responsible for the violation(s), or who have deliberately made a false report.

-END OF PROCEDURE-