

ROCHESTER PUBLIC UTILITIES
BOARD POLICY STATEMENT

POLICY SUBJECT: UTILITY COMPLIANCE

POLICY OBJECTIVE:

The purpose of this policy is to express the Board's continued intent to perform all work in compliance with applicable laws and regulations and supporting ongoing compliance programs.

SCOPE

This policy applies to RPU Board members, every RPU employee, and all contracted personnel who, individually and collectively, are responsible for complying with federal, state, regional, and local rules and regulations. This also applies to all external vendors doing business with RPU, within the scope of services such vendors provide to RPU.

POLICY STATEMENT:

1. RPU's intent is to provide a corporate environment that fosters a culture of compliance applicable for all relevant laws, regulations, and codes. All employees, individually and collectively, have the responsibility to be familiar with the compliance programs that apply to his or her job and to conduct RPU's business in accordance with those compliance programs.
2. Through its management and employees, RPU will ensure compliance by:
 - a. Dedicating resources to establish and maintain a formal compliance program.
 - b. Providing timely and accurate compliance program documentation, and disseminating such documentation to RPU employees.
 - c. Ensuring direct access by compliance program officials to the General Manager and/or the RPU Board.
 - d. Operating and managing the formal compliance program in such a manner as to maintain its independence from other RPU programs.
 - e. Ensuring that, within the scope of applicable labor laws and relevant employment contracts including collective bargaining agreements, policies regarding compensation, promotion, and disciplinary action take into account an employee's compliance with applicable rules and regulations, and the reporting of known or suspected misconduct and/or violations.

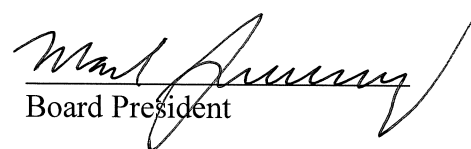
- f. Reviewing the formal compliance program periodically, and providing regularly scheduled training to employees.
 - g. Establishing an audit process whereby RPU can evaluate its compliance with applicable rules and regulations.
 - h. Provide compliance variance reporting to the Board, at least annually.
3. Where misconduct or a violation is identified, RPU will take immediate steps to cease the misconduct or violation, promptly notify relevant regulatory authorities, and cooperate fully in investigatory activities.
 4. The Board delegates to the General Manager the authority to act on its behalf to ensure compliance with the objectives of this Policy.
 5. The Board's delegated authority to the General Manager extends to the development and implementation of management policies and procedures required to meet this stated objective.
 6. The General Manager's delegated authority is limited only by law, City of Rochester Home Rule Charter provisions, City Policies or other policies which the Board has adopted or may adopt in the future.

RELEVANT LEGAL AUTHORITY: Rochester City Charter Chapter XV, Section 15.05

EFFECTIVE DATE OF POLICY: October 24, 2017

DATE OF POLICY REVIEW: September 26, 2017

POLICY APPROVAL: October 24, 2017


Board President

10-24-17
Date