Adopted – September 15, 2020

** Effective/Applicable to certain projects established/induced on/or after January 1, 2021 **
County of Monroe Industrial Development Agency ("COMIDA")

Pay Equity Policy

It is the position of COMIDA that no company receiving public funds or public benefits should be allowed to break the law and discriminate against any of its employees on the basis of gender. To that end, this policy seeks to reinforce existing equal pay law and reaffirm the responsibility of employers to pay their employees equal pay for equal work.

Any company receiving a benefit[1] from COMIDA shall submit an Equal Pay Certification which certifies compliance with all applicable equal pay laws, including but not limited to the Equal Pay Act of 1963, Title VII of the Civil Rights Act of 1964 and Federal Executive Order 11246 of September 24, 1965 (Equal Employment Opportunity), as well as Section 194 of New York State Labor Law, each of which prohibit compensating men and women differently for the same work.

a. The certification shall include a representation by the company that it has not been the subject of an adverse finding under the equal pay laws within the previous five years. If the company has been the subject of an adverse finding within the previous five years, the company shall be ineligible to receive COMIDA benefits.

b. The certification shall also include disclosure of any pending equal pay claims against the company. A pending claim will not automatically make a company ineligible to receive COMIDA benefits.

c. The certification shall also require the disclosure to COMIDA of any pending claims or adverse finding under the equal pay laws during the term of COMIDA financial assistance agreement.

If COMIDA staff should have reason to believe that the company is paying its employees unequally or in any other way violating the COMIDA equal pay policy, it will refer the matter to the appropriate enforcement agency under the equal pay laws, including the United States Equal Employment Opportunity Commission, the New York State Department of Labor or the New York State Division of Human Rights.

Approved and adopted this 24th day of March 2026.

[1] Excluding Revenue Bond Financing.