

#### HR 575 Administrative Policy

# WHISTLEBLOWER COMPLAINT

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Version #:	HR.575.2021.7
Effective Date:	March 02, 2021
Internal Compliance:	Human Resources
External Applicability:	IRS Form 990 Guidelines
Distribution Restriction:	Internal

## 1. Objective

a. To provide an avenue for employees to report possible violations of Cooperative policies or procedures, state or federal laws, or rules or regulations without fear of discrimination or reprisal for making such reports in good faith.

## 2. General Policy

- a. Applicability
  - i. All Cooperative employees.
  - ii. All personnel contracted by the Cooperative.

### b. Required Actions for Whistleblower Complaint

- i. Any employee who believes they have information concerning a violation or potential violation of state or federal law, or rules and regulations thereunder by the Cooperative, should report such information to a supervisor, the General Manager, the Director of Human Resources or the Cooperative's legal counsel. Prompt reporting of such violation is recommended so action can be taken to correct any violation.
- ii. A complaint brought in good faith to the Cooperative's management will be promptly investigated and corrective action will be taken as necessary. Confidentiality will be maintained to the extent possible throughout the investigative process.
- iii. Retaliation against an employee who reports a violation or potential violation of state or federal law, or rules and regulations the employee believes to be true and accurate is a serious violation of the policy and will be subject to disciplinary action.
- iv. Any employee filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and prove to have been made maliciously or falsely will be viewed as a serious disciplinary offense.
- v. In the event an employee bringing forth such claims wishes to remain anonymous, the Cooperative has partnered with NAVEX Global's EthicsPoint program to provide a confidential avenue for reporting. Call the toll-free number at 1-888-458-6369 or click the EthicsPoint link on the Cooperative intranet (Livewire) homepage and follow the instructions for filing a report.



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## 3. Review and Update Responsibility and Cycle

### a. Administrative Policy Review and Acknowledgement

Review Responsibility: Director of Human Resources

**Director of Regulatory Affairs** 

Review Cycle: Annually

**Review Procedure:** 

1. Confirm administrative policy.

2. Confirm annual review and report to General

Manager.

3. Annual Review Acknowledgement: Appendix A

### b. Administrative Policy Approvals

WHISTLEBLOWER COMPLAINT - Approval			
Docusigned by:  Mark Johnson		3/2/2021	
General Manager		Date	

#### c. Administrative Policy Revision History

<b>Effective Date</b>	Version #	Revised By	Revision History
12/22/04	1.0		Original
06/16/08	2.0		Amended
01/19/09	3.0	J.Goroski	Updated/Reformatted
04/01/13	4.0	P.Watson	Revised as administrative policy
12/07/15	5.0	S.Wallace,	Title updates, minor revisions
		S.Mitton,	
		G.Horvath	
11/07/16	6.0	T.Robbin,	Minor revisions
		S.Wrbelis, J.Kizer	
03/02/2021	7.0	T.Robbin,	Minor revisions
		S.Childers	



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## Appendix A – Administrative Policy Acknowledgement

WHISTLEBLOWER COMPLAINT – Annual Review Acknowledgement		
Tia Robbin	3/2/2021	
Director of Human Resources  Docusigned by:	Date	
John M Goroski	3/2/2021	
Director of Regulatory Affairs	Date	