

POLICY NO. 20-020

REVISION DATE: December 27, 2005

SUBJECT: **WHISTLEBLOWER PROTECTION**

I. PURPOSE

To adopt a policy and procedure for encouraging internal reports by Cooperative employees of suspected wrongdoing by Cooperative employees, management and/or board members, and for the handling of such reports and complaints, and to provide for protection against disciplinary or retaliatory action for such good faith reporting.

II. POLICY CONTENT

A. General Policy

Okanogan County Electric Cooperative encourages reporting by employees of suspected wrongdoing by Cooperative employees, management or board members. It is the policy of the Cooperative that no retaliation shall occur against an employee when good faith reports of suspected wrongdoing are made. Suspected wrongdoing may include any form of suspected illegal activity, accounting or auditing matters, violation of Cooperative ethics policies or violation of other company policies or other wrongdoing against the Cooperative or its employees.

B. Reporting Procedure

An employee may report suspected wrongdoing to their supervisor; Provided that if the immediate supervisor is involved in the activity, the suspected wrongdoing shall be reported to the next level of authority, including the president of the Board of Directors. The report shall contain sufficient information as necessary for a thorough investigation of the allegations.

C. Investigation

All good faith reports of suspected wrongdoing will be investigated with all due diligence and all Cooperative employees shall have a

duty to cooperate with such investigation. Management (or the Board president if management is involved in the alleged wrongdoing) may designate one or more employees to complete the investigation. The investigator shall interview the reporting employee and any witnesses identified by that employee, and shall review all documentary evidence identified by the reporting party or discovered through the investigation. The investigator shall generally also interview the alleged wrongdoer, unless the allegations are of such a nature that report should be made immediately to law enforcement authorities. During the investigation, the Cooperative shall strive to the extent reasonably possible to keep the identity of the reporting employee confidential. Unless involved in the alleged wrongdoing, the general manager and the Board shall be kept regularly informed of the investigation and any resolutions or conclusions there from. The general manager if not involved in the allegations, shall be responsible for the final determination of appropriate action upon receiving full report of the investigation.

D. Prohibition against Retaliatory Action

Any form of retaliation, including but not limited to derogatory comments, disciplinary action, demotion, suspension, discharge, threatening or harassing or in any manner discriminating against an employee who in good faith reports suspected wrongdoing is strictly prohibited and shall result in disciplinary consequences against the retaliating party, up to and including termination of employment. An employee who knowingly makes false or malicious reports shall be subject to disciplinary action and other legal action as appropriate.

III. **RESPONSIBILITY**

It shall be the responsibility of the general manager and the Board of Directors to assure that this policy is carried out.

ATTESTING:

President

Secretary

Date