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| RAILBELT RELIABILITY COUNCIL – POLICIES & PROCEDURES |                          | POLICY NO.: P-02 |
| TITLE: <b>WHISTLEBLOWER POLICY</b>                   |                          | REVISION NO.: 0  |
| EFFECTIVE: 03/14/2022                                | LAST AMENDED: 03/14/2022 | PAGE 1 OF 2      |

# WHISTLEBLOWER POLICY

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**1.0 POLICY OVERVIEW**

This policy affords processes and protections to persons who make a complaint or allegation about an alleged breach of the following Railbelt Reliability Council (RRC) rules and policies. The RRC’s Ethical Conduct Rule (ER11) requires RRC Board of Directors, staff, contractors, committee members, and members of the public approved for participation in developments (collectively, “RRC Representatives”) to observe the highest standards of professional ethics in conducting RRC business. All RRC Representatives shall exercise honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. In addition, the RRC Discrimination & Harassment Policy (P-01) prohibits any form of discrimination or harassment.

**2.0 PURPOSE**

The RRC is committed to providing a work environment where staff and members of the public are free, in good faith, to report suspected improper activity without fear of retribution or retaliation to ensure any person can be candid and honest without reservation regarding the conduct of RRC business.

The term “whistleblower” is used generally to refer to anyone who, in good faith, reports suspected improper activity. Whistleblower protections apply to RRC Representatives and members of the public.

While this policy is primarily intended to apply to improper activity related to the Ethical Conduct Rule (ER11) and to violations of the Discrimination & Harassment Policy (P-01), violations of other policies may also constitute improper activity upon review or investigation.

**3.0 DEFINITIONS**

| Term                | Definition   |
|---------------------|--|
| Whistleblower       | Anyone who, in good faith, reports suspected improper activity   |
| RRC Representatives | Directors, staff, contractors, committee members, and Approved Participants under the RRC Public Participation in a Development Rule (ER5) |

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#### **4.0 RESPONSIBILITIES OF KEY PERSONNEL**

##### **4.1 Governance Committee**

The RRC Governance Committee shall be responsible for overseeing compliance with this policy, in accordance with the Conduct Compliance Rule (ER12) (available on the RRC website at [akrrc.org](http://akrrc.org)).

#### **5.0 PROCEDURES**

##### **5.1 No Retaliation**

No RRC Representative or other person who in good faith reports a violation of the Ethical Conduct Rule (ER11), the Discrimination & Harassment Policy (P-01), or other improper activity shall be subject to harassment, retaliation, or adverse employment consequence due to the reporting. A director or employee who retaliates against someone who has, in good faith, reported an improper activity is subject to discipline as provided in the Conduct Compliance Rule (ER12). This Whistleblower Policy is intended to encourage and enable all RRC Representatives and the public to raise concerns regarding conduct with the RRC prior to seeking resolution outside the organization. Any management action resulting from the whistleblower's good-faith allegations that negatively impacts the whistleblower in a material way, including but not limited to negative salary action, written warning, demotion, suspension, bullying, or termination (including negative impacts to contractors), are forms of retaliation and/or retribution that are prohibited under this policy.

##### **5.2 Reporting, Investigations, and Sanctions**

Complaints by whistleblowers will be reported and investigated and may result in sanctions in accordance with the Conduct Compliance Rule (ER12).