



Subject: Whistleblower Policy			Policy No.: 117
Original Issue: 09/16/1994	Last Revised: 11/30/2011	Last Reviewed: 12/1/2023	Page: 1 of 2
Board Policy 28 is revoked and replaced with Board of Trustees Policy 117			

PURPOSE

The purpose of the Whistleblower Policy is to ensure that the Jemez Mountains Electric Cooperative, Inc. (JMEC) maintains an effective, easy-to-use procedure for individual employees and members to report the following:

- a. potentially illegal behavior;
- b. potentially unethical behavior;
- c. fraudulent or dishonest use or misuse of JMEC resources within the organization by JMEC employees or directors

This also provides for protection against harassment, bullying, discrimination, disciplinary or retaliatory action, or adverse employment consequences for the whistleblower for such reporting as appropriate. **This Policy also applies to the JMEC Board of Trustees who are subject to this Policy as well as the code of Conduct, Board Policy 102.**

ACCOUNTABILITY

The Board of Trustees, the General Manager, and all JMEC leadership are accountable for ensuring implementation of and adherence to this policy.

SCOPE

This Whistleblower Policy is intended to encourage and enable employees and members who reasonably believe they have information regarding a violation of Federal or State law, JMEC Bylaws and/or JMEC Policies to raise serious concerns within the organization prior to seeking resolution outside of the Cooperative.

POLICY

JMEC encourages reporting (following Complaint Procedures described in Board of Trustees Procedures 117P) of truthful information regarding violations or potential violations of Federal or State laws, JMEC Bylaws and/or JMEC Policies. All complaints brought in good faith will be investigated and all legal noncompliance will be corrected promptly. JMEC is committed to full compliance with applicable state and federal laws in all aspects of its operations. Any Trustee or employee who harasses, retaliates, or discriminates against a Whistleblower who, in good faith, has reported such a violation is subject to discipline up to and including termination of employment. Anti-retaliation protection is also afforded to any personnel who participate in an investigation, or for testifying, participating in, or otherwise assisting with investigations or enforcement actions pursuant to this policy.

Each employee has an obligation to report in accordance with this policy the following:

- a. questionable or improper accounting practices;
- b. suspected violations of the Cooperative’s code of conduct or ethics policies;
- c. suspected violations of Federal or State laws;
- d. violations or suspected violations of any Cooperative Policy; and
- e. safety issues.

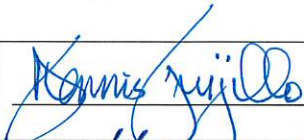
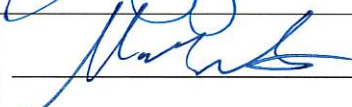


BOARD OF TRUSTEES POLICIES

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It is the Cooperative’s policy to retain an independent third-party to perform all investigations when a concern has been reported. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

The Board of Trustees, General Manager, and all JMEC Employees will be required to attend procedural training annually.

	_____, President of the Board	Date: <u>12/8/2023</u>
	_____, Chair of the Policy Committee	Date: <u>12/8/2023</u>

12/1/2023- Changes to Policy 117 are substantive.