

Phone: Espanola Cuba Jemez Springs

505-753-2105 575-289-3241 575-829-3550

Your Touchstone Energy® Cooperative

Electric Cooperative, Inc.

P.O. Box 128, Espanola, New Mexico, 87532

Subject: Internal Control Systems Policy			Policy No.: 157
Original Issue: 02/28/2025	Last Revised: 02/28/2025	Last Reviewed: 02/28/2025	Page:

I. PURPOSE

To set forth policy regarding establishment and maintenance of the Cooperative's system of internal control designed to promote efficiency of operations, reliability of financial reporting and compliance with applicable laws and regulations.

II.POLICY

It is the policy of the Board of Directors that the Cooperative will maintain adequate internal control programs and processes to ensure the integrity and accuracy of financial management systems, and that such control programs are in compliance with applicable laws and regulations.

III. EXPECTATION

A. Internal Control Components

The Board of Directors instructs Cooperative management to establish and maintain the following internal control components, to the extent that costs of controlling risks do not exceed their benefits.

- 1. An organizational environment where integrity and values control behavior and promote ethical conduct.
- 2. Assessment of risks to the achievement of critical success factors and their related goals.
- 3. Development and execution of operating policies and procedures adequate to control Cooperative activities, address risks and ensure execution of management directives.
- 4. Information and communication systems sufficient to capture and transmit important Cooperative information as required for decision-making, member service and business operations.
- 5. Routine monitoring of internal control system operations to ensure compliance with policies and procedures.

B. Review of Management's Internal Control System

Management will report to this board:

- 1. At least once each year regarding an evaluation, which may be performed by the Cooperative's independent public accountants, of the internal control system, including any needed enhancements.
- 2. As and if needed, regarding internal control system failures and corrective actions taken.



Phone: Espanola

505-753-2105 Cuba 575-289-3241 575-829-3550

Your Touchstone Energy Cooperative

Electric Cooperative, Inc.

P.O. Box 128, Espanola, New Mexico, 87532

Subject: Internal Control Systems Policy			Policy No.: 157
Original Issue: 02/28/2025	Last Revised: 02/28/2025	Last Reviewed: 02/28/2025	Page:

IV. IMPLEMENTATION AND COMPLIANCE

Implementation: Management will be responsible for implementing this policy with the intent of providing adequate internal control systems and related practices and for proposing improvements to this policy.

Compliance: The Board of Directors will review this policy at least annually to ensure its compliance. The board will hold management accountable for the effectiveness of the management control processes and practices put into place at the Cooperative.

The initial policy was established by the Board of Directors at its meeting on February 14, 2025.

President of the Board 4/25/2025 Chair of the Policy Committee