

Oklahoma Business Ethics Consortium

Whistleblower Protection Policy

The Oklahoma Business Ethics Consortium (“OK Ethics”) expects its officers, directors, volunteers, consultants, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Officers, directors, volunteers, consultants, and employees of OK Ethics must fulfill their responsibilities with honesty and integrity, and must comply with all applicable policies, laws and regulations. This Whistleblower Protection Policy applies to all officers, directors, volunteers, employees (whether full-time, part-time or temporary), and those who provide contract services to OK Ethics.

Reporting Responsibility

It is the responsibility of all officers, directors, volunteers, consultants, and employees of OK Ethics to report their concerns about any possible violations of policies, unethical conduct, or violations of laws or regulations that govern OK Ethics’ activities and operations (collectively referred to in this policy as “Violations”). This policy is intended to encourage and enable officers, directors, volunteers, consultants and employees of OK Ethics to raise concerns about suspected Violations internally so that OK Ethics can address and correct any inappropriate conduct or actions.

Reporting Procedure

OK Ethics’ Vice President of Risk Management has been designated as the Compliance Officer of OK Ethics. If you reasonably believe that a practice or activity is unethical or in violation of law or an OK Ethics policy, you are encouraged to submit a written complaint to the Compliance Officer, who is responsible for investigating all reported complaints (except those involving possible Violations by the Compliance Officer). You may submit your complaint or concern directly to the Compliance Officer, or to the President of the OK Ethics’ Board of Directors or the Founder or Executive Director of OK Ethics, who will refer the complaints to the Compliance Officer. If the possible Violation involves an act or omission by the Compliance Officer, you should submit your complaint or concern to the President of the OK Ethics Board of Directors, who will either investigate or appoint an appropriate officer of OK Ethics to investigate the complaint.

OK Ethics encourages anyone reporting a suspected Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted anonymously.

Confidentiality, Investigation of Reported Violations

The Compliance Officer will be responsible for ensuring that all reports of suspected Violations are promptly investigated and that appropriate corrective action is taken, if warranted. Reports of suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and take appropriate corrective action.

Unless the complaint involves an act or omission by the Treasurer, the Compliance Officer will immediately notify the Treasurer of OK Ethics of any concerns or complaints regarding accounting practices, internal controls or auditing, or alleged financial improprieties, and the Treasurer will assist the Compliance Officer in investigating the report and implementing any appropriate corrective action.

The Compliance Officer is authorized to retain and consult with legal counsel to determine what type of corrective action should be taken and whether others outside of the organization (including law

enforcement) should be notified of the suspected Violation. The Compliance Officer will provide a confidential written report to OK Ethics' board of directors concerning the status and resolution of each investigation.

No Retaliation; Acting in Good Faith

You will not be subjected to retaliation, intimidation, harassment, or other adverse action for reporting a possible Violation in good faith or cooperating in the investigation of a Violation in accordance with this Policy. If you believe that you are the subject of any form of retaliation for such participation, you should immediately report the same as a violation of and in accordance with this Policy.

Anyone who retaliates against someone who has reported a suspected Violation in good faith will be subject to appropriate action (up to and including termination of office, employment, or volunteer status, or removal from the Board of Directors, as applicable).

Anyone who submits a report concerning a suspected Violation must act in good faith and must have reasonable grounds for believing that a Violation has occurred or is likely to occur. If investigation discloses that the person who reported the suspected Violation has made unsubstantiated allegations maliciously or with the knowledge that the allegations are false, he or she will be subject to appropriate action (up to and including termination of office, employment, or volunteer status, or removal from the Board of Directors, as applicable).