



OPC Foundation Whistleblower Policy

The OPC Foundation is committed to the highest possible standards of ethical, moral and legal conduct. All participants in OPC Foundation activities are expected to conduct themselves in accordance with the law and in a professional and respectful manner. The purpose of this policy is to encourage and enable the OPC Foundation community to raise concerns within the OPC Foundation without any fear of retaliation. The OPC Foundation's Board of Directors and officers have the responsibility to promptly report violations or concerns regarding potential violations of OPC Foundation policies, laws, regulations or ethical standards. It is the policy of OPC Foundation not to retaliate against any good faith reports of inappropriate, unethical or illegal conduct.

Reporting – Complainants may report any suspected violation or inappropriate conduct in writing to the Executive Director and to the Chair of the Board of Directors, or if the complainant feels reluctant to report to those individuals for whatever reason, then they may send their report to another level of OPC Foundation management or OPC Foundation counsel. Such reports may be submitted anonymously, but persons submitting reports are encouraged to include their names because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to the seriousness of the issue, the credibility of the concern, and the likelihood of confirming the allegation. Reports of violations or suspected violations will be kept confidential except as consistent with the need to conduct an adequate investigation.

Investigation – The non-implicated members of the Board of Directors will investigate all reported violations and decide on any appropriate corrective or disciplinary actions.

Good Faith – Anyone filing an allegation must be acting in good faith. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed and treated as a serious disciplinary offense.

Safeguards - No individual shall be adversely affected because they refuse to carry out a directive which, they reasonably believe in good faith constitutes fraud, or is a violation of state or federal law. The safeguards in the No Retaliation section below apply to these individuals.

No Retaliation – No one who reports a suspected violation in good faith shall suffer harassment or retaliation for that report. Any person who retaliates against someone who has reported a violation in good faith is subject to discipline, up to and including termination of their relationship with OPC Foundation.



Definition of terms – For purposes of this policy, potential violations of OPC policies, laws, regulations, or ethical standards could include, but are not limited to:

- Acts which are inconsistent with OPC Foundation policies and procedures
- Theft or other misappropriation of OPC Foundation assets
- Misstatements or other irregularities in OPC Foundation records or financial reporting
- Misuse of OPC Foundation resources
- Illegal activities
- Forgery or alteration of documents
- Any form of fraud
- Speech or behavior that is sexually aggressive or inappropriate
- Speech or behavior that demeans or intimidates based on attributes such as race, gender, religion, age, appearance, experience, color, national origin, ancestry, disability, sexual orientation, or gender identity.
- Unwelcome comments regarding a person’s lifestyle choices and practice
- Abusive, offensive, insulting, demeaning or degrading language or imagery
- Any form of harassment

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