

**EGYPTIAN ELECTRIC COOPERATIVE ASSOCIATION  
POLICY BULLETIN NO. 222**

**SUBJECT: WHISTLEBLOWER COMPLAINT PROCEDURE AND ANTI-  
RETALIATION  
POLICY:**

**I. PURPOSE:**

This policy is intended to set forth guidance concerning Egyptian Electric Cooperative Association's [EECA] whistleblower complaint procedures and the anti-retaliation protections afforded to employees of EECA. EECA is committed to full compliance with applicable state and federal laws in all aspects of its operations. EECA encourages reporting (following Complaint Procedures, below) of truthful information regarding violations or potential violations of federal or state laws. All complaints brought in good faith to EECA management will be investigated and all legal noncompliance will be corrected promptly. EECA prohibits retaliation against any employee who utilizes this Complaint Procedure or who participates in an investigation pursuant to this policy. EECA also complies fully with all state and federal laws that protect employees from retaliation for reporting truthful information to state or federal law enforcement or for testifying, participating in, or otherwise assisting with investigations or enforcement actions against EECA.

**II. CONTENT:**

A. Reporting Information Regarding Federal/State Law Violations

1. Individuals who reasonably believe they have information regarding a violation or potential violation of state or federal law by EECA, should bring their concerns to the attention of the Executive Vice-President/ General Manager or to the Cooperative General Counsel. Complaints also can be brought to the attention of their immediate supervisor or the Administrative Assistant. EECA encourages prompt reporting of any information so that immediate corrective action can be taken to correct any legal noncompliance.
2. Any Complaint brought in good faith to EECA management will be investigated promptly and, if required, corrective action will be taken promptly. Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation.
3. Retaliation against an individual who reports violations or potential violations of state or federal law that the individual reasonably believed to be true and accurate is a serious violation of this policy and will be subject to disciplinary action. This whistleblower protection against retaliation extends to any individual who makes reports that the individual reasonably believed to be true and

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accurate internally at EECA, who makes such reports externally to state or federal law enforcement, or who testifies, participates in, or otherwise assists with any such internal or external investigation or enforcement activities against EECA.

4. Acts of retaliation should be reported immediately to the Executive Vice-President/ General Manager or to the Cooperative General Counsel. Complaints also can be brought to the attention of the immediate supervisor or the Administrative Assistant and such acts will be promptly investigated and addressed.
5. Misconduct constituting retaliation for whistleblower activities will be dealt with appropriately. Responsive action may include: training, referral to counseling and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination of employment, as EECA believes appropriate under the circumstances.
6. Individuals who make false and malicious complaints under this policy (as opposed to complaints which, even if erroneous, are made in good faith based on a reasonable belief in the truth and accuracy of such information) may be subject to appropriate disciplinary action, including termination of employment.

**III. CONCLUSION**

EECA has developed this policy so that all EECA employees will work together to maintain the highest level of compliance with all state and federal laws. EECA will make every reasonable effort to ensure that all concerned are familiar with these policies and aware that any violation of such policies will be investigated and resolved appropriately. Any employee who has any questions or concerns about this policy should talk with the Executive Vice-President/ General Manager or with the Administrative Assistant.

Adopted: 11/23/2004

Gilbert Kroening, Secretary