

## American Water Works Section – Minnesota Section

# WHISTLEBLOWER POLICY

### 1. Purpose

Minnesota Section of the American Water Works Association (a.k.a. MnAWWA) requires board members, committee members and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee members and volunteers to comply with all applicable laws and regulatory requirements.

### 2. Reporting Responsibility

MnAWWA seeks to have an “Open Door Policy” and encourages board members and volunteers to share their questions, concerns, suggestions, or complaints regarding the MnAWWA and its operations with someone who can address them properly. In most cases, a board member or committee member should present his or her concerns to the Section Chair. However, if a board member is not comfortable speaking with the Section Chair or is not comfortable with the Section Chair’s response, the board member, committee member or volunteer is encouraged to speak with anyone on the Board whom the person is comfortable in approaching.

### 3. No Retaliation

No board member, committee member, or volunteer who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation, or adverse consequence. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within MnAWWA prior to seeking resolution outside the organization.

### 4. Compliance Officer

MnAWWA’s Section Chair will act as the Compliance Officer. The Compliance Officer is responsible for investigating and resolving all complaints and allegations concerning violations of the Principles and/or Code. The Section Past-Chair, or his or her designee, will take on the Compliance Officer role if the complaint involves the Section Chair.

### 5. Accounting and Auditing Matters

The Finance Committee of the Section shall address all reported concerns or complaints regarding accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee Chair of any such complaint and work with the Committee until the matter is resolved.

### 6. Requirement of Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### 7. Confidentiality

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.

### 8. Handling of Reported Violations

The Compliance Officer, or the person responsible for carrying out the Compliance Officer’s role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or

suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.