
POLICY OF THE ROCKY MOUNTAIN BIOLOGICAL LABORATORY

TITLE: Whistleblower Protection

Date of Adoption: Oct. 21, 2008

Modification History: _____

Introduction

RMBL Employees must comply with all applicable laws, regulations, and RMBL policies. Set forth below is RMBL's policy with respect to reporting good-faith concerns about the legality or propriety of the actions of RMBL personnel.

Reporting Responsibility

It is the responsibility of all RMBL personnel to comply with applicable laws, regulations and RMBL policies. Additionally, it is the responsibility of individuals to report violations or suspected violations in accordance with this Whistleblower Policy.

Confidentiality

The RMBL will treat all communications under this policy in a confidential manner, except to the extent necessary 1) to conduct a complete and fair investigation, or 2) to review RMBL's operations by its board of trustees, auditors, and legal counsel.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Laws must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of laws and/or RMBL Policies. Individuals may be subject to disciplinary action if they make allegations which cannot be substantiated, which have been made maliciously, and/or with knowledge that the allegations are false.

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.

No Retaliation

RMBL will not permit any negative or adverse actions to be taken against any employee or individual for making a good-faith report of a possible violation of laws or RMBL policies, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated. An employee or other member of the RMBL community who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, exclusion from RMBL membership, or

withdrawal of permission to work or to study at RMBL. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within RMBL prior to seeking resolution outside the organization.

How to Report Concerns or Complaints

Employees and others may communicate suspected violations of applicable law or RMBL policies, by contacting RMBL's Executive Director (contact info) or, if the complaint involves the Executive Director, the President of the Board of Trustees. If complainants wish to remain anonymous, it is unnecessary to provide a name or position.

Whether or not the individual identifies his or herself, for a proper investigation to be conducted, please provide RMBL with as much information as possible.

Any individual who has questions about this policy should contact either the Executive Director or President of the Board of Trustees.

Illustrative Types of Concerns

The following is a nonexhaustive list of the kinds of improprieties that should be reported:

- Supplying false or misleading information on RMBL's financial or other public documents, including its Form 990
- Providing false information to or withholding material information from RMBL's board or auditors
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state law or regulations
- Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations
- Embezzling, self-dealing, private inurement (i.e., RMBL earnings inuring to the benefit of a trustee, officer, or senior staff) and private benefit (i.e., RMBL assets being used by anyone in the organization for personal gain or benefit)
- Paying for services or goods that are not rendered or delivered
- Using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations; unwelcome physical or verbal advances; sexual propositions; verbal abuse of a sexual nature; the display of sexually suggestive objects, cartoons, or pictures; and physical contact of a sexual or particularly personal nature.
- Using epithets, slurs, negative stereotyping, and threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, age, or disability
- Circulating or posting written or graphic material in the workplace that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, nationality, age, or disability

- Discriminating against an employee or potential employee due to a person's race, color, religion, sex, sexual orientation, national origin, age, physical or mental impairment, or veteran status
- Violating RMBL's Conflict-of-Interest Policy (see RMBL Bylaws) or Equal Employment Opportunity Policy
- Facilitating or concealing any of the above or similar actions

Questions

If you have any questions regarding this policy, please contact the Executive Director.