



# ETC Cooperative (“ETC Coop”)

## Whistleblower Policy

### General

The mission and regulations of the Ethereum Classic Cooperative require officers, employees, representatives and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, including the compliance with ETC Coop policies, standards, practices and with applicable laws and regulations.

### Purpose

The purpose of this policy is:

- to facilitate making disclosures;
- to facilitate the investigation of disclosures;
- to protect those who in good faith make disclosures;
- to ensure compliance with ETC Coop policies, standards, practices and with applicable laws and regulations.

### Matters Warranting Disclosure

“Disclosures” include, but are not limited to, information concerning:

- an act or omission constituting a violation of ETC Coop policies, standards or practices;
- an act or omission constituting an offence under any state or federal legislation;
- an act or omission that creates a substantial and specific danger to the life, health or safety of persons or to the environment;
- gross mismanagement.

### Reporting Responsibilities

It is the responsibility of all officers, employees, representatives and volunteers to comply with the mission and values of the ETC Coop in their officership, employment, contractual obligations and volunteer activities, and to make disclosures when appropriate.

### Making Disclosures

The ETC Coop encourages individuals to make disclosures of the ‘Matters Warranting Disclosure’ identified above. Under normal circumstances disclosures should be made directly to supervisors, whose responsibility it is to ensure organizational integrity, compliance and accountability.

The ETC Coop recognizes, for various reasons, it may not always be possible to make disclosures through normal channels and thus has provided a means for reporting such disclosures through the mechanism provided in this policy.

## **No Reprisal**

An individual who retaliates, in any fashion, against someone who has made a disclosure in good faith may be subject to discipline up to and including termination.

## **Anonymity**

Individuals are encouraged to provide their name and contact information when making a disclosure, through the email address provided, understanding that this makes it easier to investigate the disclosure. If requested, anonymity can be secured.

## **Disclosures not made in Good Faith**

The ETC Coop is concerned about protecting the reputation of its Officers, employees, representatives, volunteers and members from false or malicious allegations. The ETC Coop will therefore ensure that the necessary resources are provided to investigate any disclosure which it receives.

It is important to understand that the ETC Coop will view seriously any disclosure which proves to be false, malicious or of a frivolous nature, and that any person making such a disclosure may be subject to discipline up to and including termination.

## **How the Organization will respond**

The ETC Coop will respond to each disclosure in a timely and efficient manner. It should be noted that the seriousness, complexity and timeliness of a disclosure may impact the method, resources and speed with which a disclosure is reviewed and/or investigated and resolved.

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property, or program operation, should be reported to: the Chairman of the ETC Coop Board of Directors or the Executive Director if it concerned the Chairman of the ETC Coop Board of Directors.

As approved by ETC Coop, Board of Directors on \_\_\_\_\_

Email: [whistleblower@etccooperative.org](mailto:whistleblower@etccooperative.org)