HRA VEBA Trust
Whistleblower Policy

Revised February 2024

I. INTRODUCTION

HRA VEBA Trust ("Trust") is committed to the highest standards of openness, honesty, and accountability. Accordingly, the Trust requires the Board of Trustees (each member referred to individually as a "Trustee" and collectively as the "Board"), Plan service providers (including but not limited to third-party administrators, consultants, record-keepers, banks, and custodians), or any other person having responsibility for the management or administration of the Trust's finances, investments, or other proprietary information concerning the Trust (each individually an "Interested Party" and collectively "Interested Parties") to observe high standards of business and personal ethics in the conduct of their duties and responsibilities to the Trust. To further ensure the integrity of its operations, the Trust has adopted this Whistleblower Policy ("Policy") that encourages, protects, and supports the responsible reporting of complaints and concerns regarding improper conduct by an Interested Party.

The Trust encourages an environment where individuals can confidentially and anonymously report complaints and concerns regarding known or suspected Improper Conduct (as defined below) without fear of reprisal. Therefore, this Policy is intended to ensure the appropriate body can receive, retain, and investigate all reports of known or suspected Improper Conduct by Trustees, service providers, sponsors, or third-party administrators.

The Chair of the Board ("Chair") and Vice Chair of the Board ("Vice Chair") are responsible for ensuring that all complaints about Improper Conduct (as defined below) are investigated and resolved. The Chair will advise the Board of all complaints/concerns and their resolution and will report at least annually to the external auditor on compliance activity relating to accounting or alleged financial improprieties.

II. POLICY

Improper Conduct

This Policy is designed to allow anyone (including but not limited to a participant, beneficiary, or Interested Party) to report improper, illegal, or unethical conduct (collectively, "Improper Conduct") including, but not limited to:

- Suspect, questionable, unethical, and unlawful accounting and auditing policy, practices, or procedures;
- Intentional breach of or failure to implement accounting and auditing policy, practices, and procedures approved by the Board;
- Inadequate internal accounting controls;
- Misleading or coercion of auditors;
- Disclosure of fraudulent or misleading financial information;
- Failure of an Interested Party to disclose Conflicts of Interest as required by the Trust's Conflicts of Interest Policy;

- Instances of corporate fraud;
- Waste of Trust funds or resources;
- Mismanagement of the Trust;
- Harassment by an Interested Party of a participant, beneficiary, or another Interested Party, of any kind, whether verbal, written, or physical, including but not limited to harassment on the basis of a status that is protected by law and unwanted or unwelcome sexual conduct, or sexually-oriented abuse;
- Unethical, illegal, or inappropriate conduct or use of authority in one's capacity as an Interested Party to accomplish any of the above or for personal gain (financial or otherwise); and
- Acts of retaliation (as described below) by an Interested Party against any reporting party.

Protection from Retaliation

Any person who in good faith and with reasonable grounds for belief reports a complaint or concern regarding known or suspected Improper Conduct under this Policy will be protected from retaliation by the Trust or any Interested Party. The Trust will not tolerate any attempts, to any degree, to victimize, discriminate, or harass a reporting party who reported known or suspected Improper Conduct in good faith. Any such retaliation should be reported immediately to any Trustee(s) or to the Chair of the Board ("Chair"). The Trust regards such retaliation as a serious disciplinary offense which may result in removal or termination as an Interested Party.

Reporting Known or Suspected Improper Conduct

Concerns or complaints regarding known or suspected Improper Conduct can be anonymously reported via facsimile, e-mail, telephone, or mail. These reports should be directed to the Chair and/or the Vice Chair if the Chair is implicated in the report. The Chair and Vice Chair may be contacted by mail, telephone, fax, or e-mail as follows:

Chair
Doug Detling
363 Fargo St.
Eagle Point, OR 97524
541-324-2488
doug.detling@gmail.com

Vice Chair
Sylvia Hubbard
Grant County PUD
P.O. Box 878
Ephrata, WA 98823
(509) 845-6507
shubbard@gcpud.org

Reporting parties are encouraged to provide as much detail as possible including: dates, names, places and events that took place, the reporting party's perception of why the incident(s) may constitute Improper Conduct, and what action the reporting party recommends be taken.

Timely Reporting

To ensure that a suitable investigation can be commenced, reporting parties should seek to report known or suspected Improper Conduct promptly.

Investigating a Report

The Trust will quickly respond to reports of known or suspected Improper Conduct in accordance with this Policy. Reporting parties should remember that a preliminary investigation into a concern/complaint is not the same as a finding that the report should be referred for further investigation or has merit.

When appropriate, the concern or complaint may:

- be investigated by the Board of Trustees, an internal audit, or legal counsel;
- be referred to the police;
- be referred to the external auditor; and/or
- form the subject of an independent inquiry.

To help protect the reporting parties, those accused of Improper Conduct, and interested third parties, initial inquiries may be made to determine whether an investigation is appropriate and if so, what form it should take.

While investigating reports of known or suspected Improper Conduct, the Trust will abide by applicable laws and keep in mind the best interests of the Trust and its participants and beneficiaries. Some concerns may be resolved by agreed action without the need for further investigation or action. If urgent action is required, such action may be taken before an investigation is completed.

Unless submitted anonymously, the reporting party will be sent a letter within fifteen (15) business days of receipt of a report of known or suspected Improper Conduct:

- acknowledging that the report has been received;
- reciting the reporting party's suggestion as to how the matter should be dealt with (if applicable);
- giving an estimate of how long it will take to provide a final response;
- telling the reporting party whether any initial inquiries have been made; and,
- telling the reporting party whether further investigation(s) will take place and if not, why not.

The amount of contact between the person(s) considering the issue and the reporting party will depend on the nature of the concerns/complaints raised, the potential difficulties involved, and the clarity of the information provided. If the Trust needs to seek further information from the reporting party, it will do so discreetly.

In determining what actions to take, considerations include, but are not limited to: the alleged Improper Conduct of the wrongdoer; the seriousness of the allegation; the credibility of the allegation; and, the urgency of an investigation and resolution.

Confidentiality

Reports may be submitted on a confidential or anonymous basis. The investigating person or body will respect the wishes of any reporting party who requests confidentiality, but can only do so to the extent permitted by law or to the extent possible, consistent with the need to conduct an adequate investigation. Reporting parties should recognize, however, that it is easier to follow up and verify complaints if the reporting party is prepared to give their name.

False, Malicious, and Bad Faith Reports

The sensitive nature of the Trust's reputation demands that any report that proves to be unsubstantiated or which has been submitted with malicious intent or in bad faith (i.e., when known to the reporting party to be false) be viewed very seriously. The Trust regards the making of such reports as a serious disciplinary offense which may result in disciplinary action up to and including removal or termination of an Interested Party.

Annual Reporting and Review

The Chair shall annually report to the Board:

- the number of reports received pursuant to this Policy;
- the number of investigations commenced in response to these reports;
- the number of wrongdoings discovered; and,
- all disciplinary actions taken in response to matters discovered through a report under this Policy.

The Board will review this Policy periodically to consider its effectiveness in promoting disclosure of known or suspected Improper Conduct while minimizing the opportunities for unnecessary investigations.

Records Retention

The Board shall retain all records relating to reports submitted under this Policy for a period of seven (7) years or the period of time set forth in the Trust's Document Retention and Destruction Policy.