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## Policy and Procedure 7: Ethics Hotline

### 1. Objective

The objective of this policy and procedure is to set forth the Midwest Reliability Organization (MRO) policies and procedures regarding reporting reasonably suspected violations of MRO policies or any laws or regulations that govern MRO's operations.

### 2. Policy

Any MRO director, officer, employee, agent or member and its representative who serves on any MRO organizational group ("covered persons") or other interested person who reasonably believes that there has been a violation of a Reliability Standard or of an MRO Policy and Procedure can report it using the procedures described below.

### 3. Responsibilities

- Any covered person who in good faith reports a suspected violation of a Reliability Standard or MRO's Policies and Procedures under this Ethics Hotline Policy will be protected from threats of retaliation, discharge, or other types of discrimination. A covered person may not make a statement knowing it is false or in reckless disregard of the truth.
- The Chief Compliance Officer will provide a quarterly report to the Governance and Personnel Committee of any complaints made directly to them or through the MRO Ethics Hotline pursuant to MRO's Policy and Procedure 7: Ethics Hotline.

#### A. Suspected Violations of Reliability Standards

- Reports of suspected violations of a Reliability Standard should be made pursuant to the North American Electric Reliability Corporation's (NERC's) Compliance Hotline Procedure, see <https://www.nerc.net/hotline>. Reports of suspected violations of a Reliability Standard can also be made to MRO's Chief Compliance Officer if the NERC Compliance Hotline is not a viable option.
- Reports of suspected violations of a Reliability Standard can be made to:

**NERC's Compliance Hotline (suspected violations of Reliability Standards)**

[hotline@nerc.net](mailto:hotline@nerc.net)

(609) 524-7029

**Chief Compliance Officer, Midwest Reliability Organization**

Mr. Lam Chung

380 St. Peter Street

Saint Paul, Minnesota 55102

Tel: (651) 256-5187

Fax: (651) 855-1712

[Lam.Chung@mro.net](mailto:Lam.Chung@mro.net)

- Reports should include as much specific information as possible such as names, dates, places, and a description of the event that took place; the person's belief of why the incident(s) is a suspected violation of a Reliability Standard; and the action the person recommends be taken.



- Upon receipt of a report of suspected violation via the NERC Compliance Hotline, NERC will determine whether to initiate an investigation.
  - Responses to a report will be made within 20 working days, or as soon as practicable thereafter, directly to the person making the report if he or she has disclosed his or her identity. If the person makes the report anonymously through NERC's Compliance Hotline, the response will be provided to the person through the same hotline.
  - If NERC determines that a Reliability Standard compliance violation investigation is not warranted, it will document its supporting reasons and notify the interested person, and the Registered Entity involved that no further action will be taken.
- Upon receipt of a report of suspected violation via directly contacting the Chief Compliance Officer, they will determine whether to initiate an investigation. The Chief Compliance Officer will direct the investigation, if any, of the allegations in the report or designate MRO staff and/or third parties to conduct the investigation or refer the matter to NERC for investigation.
  - Responses to a report will be made within 20 working days, or as soon as practicable thereafter, directly to the person making the report if he or she has disclosed his or her identity. If the person makes the report anonymously to MRO's Compliance Officer, in such a manner that the person can be contacted, the response will be provided through that same medium to the extent possible. If a person makes the report anonymously to MRO's Compliance Officer and MRO is not able to contact the person, MRO will complete its response and maintain it, pursuant to its normal record retention policies.
- [Chart 1: Suspected Violations of Reliability Standards](#) provides an overview of the process for suspected violations of Reliability Standards.

## **B. Suspected Violations of MRO's Policies and Procedures**

- Reports of suspected violations of MRO's Policies and Procedures can be made to MRO's Chief Compliance Officer or third party "Hotline" provider. The identity of the person making the report shall not be disclosed if such person requests anonymity.
- Reports of suspected violations of an MRO Policy and Procedure can be made to:

### **Chief Compliance Officer, Midwest Reliability Organization**

Mr. Lam Chung  
380 St. Peter Street  
Saint Paul, Minnesota 55102  
Tel: (651) 256-5187  
Fax: (651) 855-1712  
[Lam.Chung@mro.net](mailto:Lam.Chung@mro.net)

### **MRO Ethics Hotline**

MRO's Third Party Hotline, Lighthouse Services  
[reports@lighthouse-service.com](mailto:reports@lighthouse-service.com) (Reference MRO)  
(877) 472-2110

- Reports should include as much specific information as possible such as names, dates, places, and a description of the event that took place; the person's belief of why the incident(s) is a suspected violation of MRO's Policies and Procedures; and the action the person recommends be taken.
- Upon receipt of a report of suspected violation directly or through the MRO Ethics hotline, the Chief Compliance Officer will determine whether to initiate an investigation. The Chief



Compliance Officer will direct the investigation, if any, of the allegations in the report or designate MRO staff and/or third parties to conduct the investigation.

- Responses to a report will be made within 20 working days, or as soon as practicable thereafter, directly to the person making the report if he or she has disclosed his or her identity. If the person makes the report anonymously to the MRO's Compliance Officer or through MRO's third party hotline in such a manner that the person can be contacted, an account will be established on MRO's third party hotline and the anonymous person will be provided access information and the response will be provided through the third party hotline. If a person makes the report anonymously to MRO's Compliance Officer and MRO is not able to contact the person, MRO will complete its response and maintain it pursuant to its normal record retention policies.
- [Chart 2: Suspected of MRO Policy and Procedures](#) provides an overview of the process for suspected violations of MRO's Policy and Procedures.



**Chart 1: Suspected Violations of Reliability Standards**

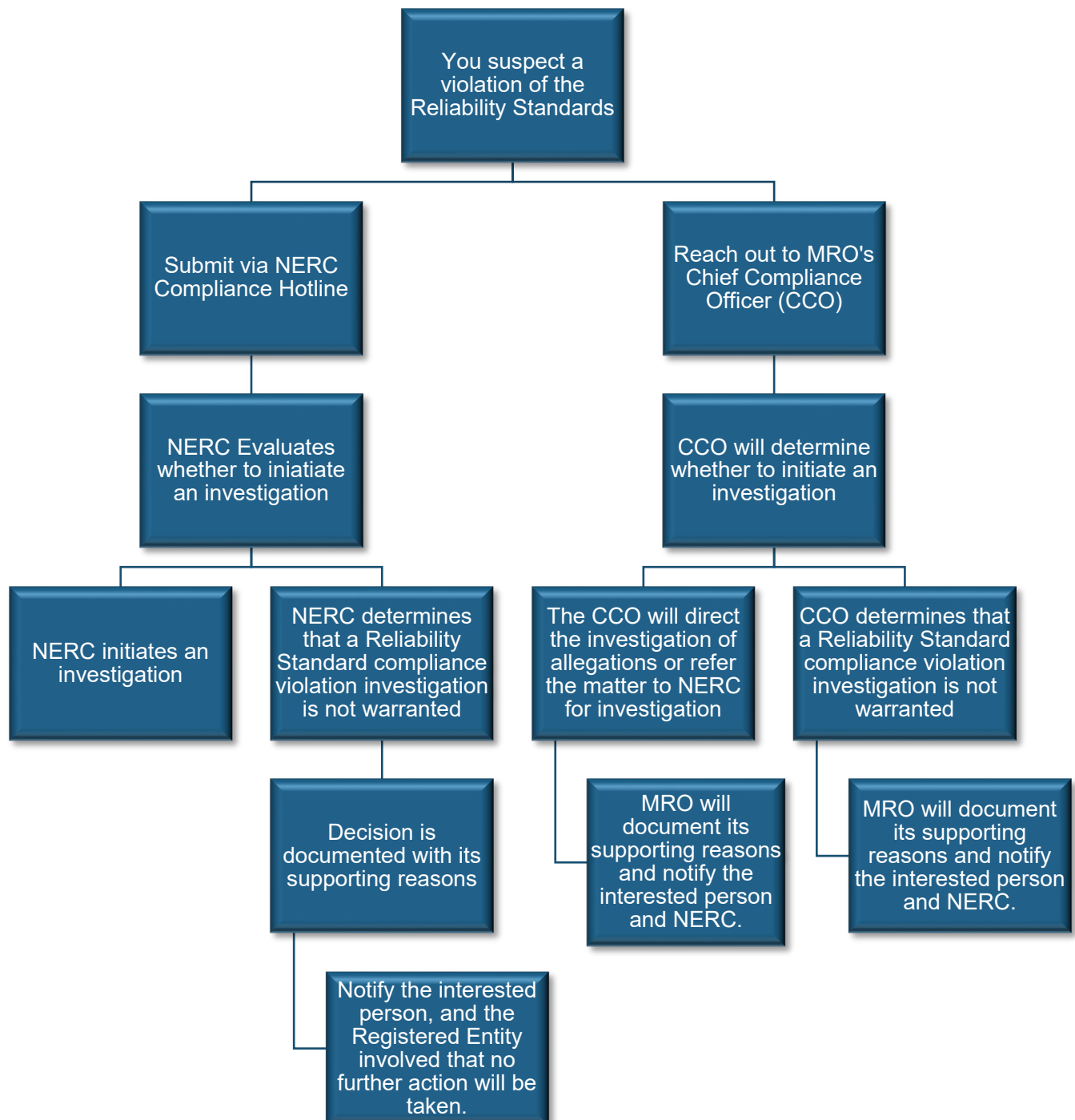




Chart 2: Suspected Violations of MRO Policy and Procedures

