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## Policy and Procedure 7: Whistleblowing

### 1. Objective

The objective of this policy and procedure is to set forth the Midwest Reliability Organization (MRO) policies and procedures regarding whistleblowing.

### 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 Whistleblowing 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.
- Reports of suspected violations of a Reliability Standard or MRO’s Policies and Procedures can be made to MRO’s Chief Compliance Officer or third party “Hotline” provider. Suspected violations of a Reliability Standard may also be made pursuant to the North American Electric Reliability Corporation’s (NERC’s) Compliance Hotline Procedure, see <https://www.nerc.net/hotline>. The identity of a person making a report shall not be disclosed if such person requests anonymity. Reports of suspected violations of a Reliability Standard or MRO’s Policies and Procedures can be made to:

**Corporate 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)

**Hotlines**

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

NERC’s Compliance Hotline (suspected violations of Reliability Standards)  
[hotline@nerc.net](mailto:hotline@nerc.net)  
(609) 524-7029

- 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 or MRO's Policies and Procedures; and the action the person recommends be taken.

- Upon receipt of a report of suspected violation directly or through one of the hotlines, 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 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 either 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 MRO's third party hotline or NERC's Compliance Hotline, the response will be provided to the person through the same hotline. If the person makes the report anonymously to MRO's Compliance Officer 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.
- If MRO determines that a Compliance Violation Investigation is not warranted, it will document its supporting reasons and notify the interested person, NERC, and the Registered Entity involved that no further action will be taken.
- The Chief Compliance Officer will provide a quarterly report to the Governance and Personnel Committee of any complaints made pursuant to MRO's Policy and Procedure 7: Whistleblowing.