

## **Renewable Northwest Project Accountability Policy<sup>1</sup>**

Renewable Northwest Project's Code of Ethics ("Code") requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Accountability Policy.

### **No Retaliation**

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Accountability Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

### **Reporting Violations**

The Code addresses RNP's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, RNP's Director is the best person to address an area of concern. However, if you are not comfortable speaking with RNP's Director or you are not satisfied with their response, you are encouraged to speak with the Board Chair. The Director is required to report suspected violations of the Code of Conduct to RNP's Board Chair, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, individuals should contact RNP's Board Chair directly. In cases that involve RNP's Board Chair, violations should be reported to RNP's Vice Chair.

### **Investigating and Resolving Complaints**

RNP's Board Chair is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at their discretion, shall advise the Director and/or the Executive Committee. The Board Chair shall have direct access to the Executive Committee and the Finance & Audit Committee, and is required to report to the board of directors at least quarterly on any open investigations, and also at the conclusion of any investigation.

### **Accounting and Auditing Matters**

The Finance & Audit Committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Board Chair

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<sup>1</sup> This policy based upon a sample policy provided by the National Council of Nonprofit Associations, 2004.

shall immediately notify the Finance & Audit Committee of any such complaint and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **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.

### **Handling of Reported Violations**

The Board Chair will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.