



Whistleblower Policy

Effective Date: 2/1/2025

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Policy Statement

The Regional Food Bank of Oklahoma is committed to maintaining the highest standards of integrity, transparency and accountability in all aspects of our operations. We believe that fostering a culture of ethical behavior and providing a safe environment for our employees is essential to achieving our mission and upholding our values. As we believe that every employee has the right to work in an environment where everyone feels valued and respected, we will not tolerate any behavior that violates this policy and we will take prompt and appropriate action to address any incidents.

Scope

This policy applies to all employees of the Company, including full-time, part-time, temporary and contract employees. It covers any reported concerns or grievances related to illegal activities, unethical behavior, fraud, corruption, discrimination, harassment, safety violations or any other activities that may harm the organization or its stakeholders.

Similar complaints made from non-employees against existing employees would direct their complaints to the human resources department or CEO. If the complaint is made concerning the CEO, the complaint should be made directly to the current board chair. In the event a complaint concerning the CEO is received by the human resources department, it will immediately be turned over to the current board chair.

All forms of unlawful retaliation are prohibited, including any form of discipline, reprisal, intimidation or other form of retaliation for participating in an activity protected by law. Examples of protected activities include:

- Lodging a good faith internal complaint (whether written or oral) with management specifically opposing unlawful discrimination or harassment or complaining about violations of wage and hour law (for example: if an employee believes they have been sexually harassed or not paid overtime they are owed).
- Filing a good faith complaint of unlawful discrimination or harassment with the U.S. Equal Employment Opportunity Commission (EEOC) or in court.
- Participating in the Company's internal investigation into allegations of sexual harassment.
- Supporting another employee's internal or administrative complaint of unlawful discrimination (by, for example, testifying or providing an affidavit in support of a co-worker who has filed a discrimination complaint with the EEOC or in court).
- Filing a good faith complaint with the U.S. Department of Labor (DOL) or in court about wage and hour violations or unfair pay practices or participating in a wage and hour investigation or audit conducted by the DOL or state or local administrative agency.
- Requesting accommodation for a sincerely held religious belief.
- Filing a worker's compensation claim.

Our commitment to maintaining an inclusive workplace free of retaliation is an essential part of our culture and our values and we expect all employees to embrace and support this policy.

Roles and Responsibilities

All reports submitted under this policy will be treated confidentially to the extent possible, with information disclosed only to those who need to know for investigation and resolution purposes. Confidentiality will be maintained in accordance with legal requirements and the organization's policies.

Procedures:

The Company has partnered with Work Shield to handle all investigations around harassment, discrimination and misconduct issues. You can report the incident directly to Work Shield or you can report the incident to Human Resources or your manager who can submit a report on your behalf. The whistleblower is not responsible for investigating the alleged illegal or dishonest activity, or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Reporting Channels:

Employees are encouraged to report concerns or grievances internally through the following channels:

- Manager: Employees may report their concerns directly to their immediate manager, who will submit a report to Work Shield.
- Human Resources: Alternatively, employees may report their concerns to Human Resources who will submit a report to Work Shield.
- Work Shield: To report an incident for yourself or as a proxy on behalf of another employee, please visit rfbo.workshieldportal.com or call 1-866-946-5558. You can download Work Shield's Digital ID Card to your Apple Wallet or Google Pay app on your smart device for access anytime, anywhere. It's always best to provide as much detail about an incident as possible so that they can provide the most thorough investigation and resolution recommendations.

Investigation and Resolution:

- Prompt Investigation: All reported concerns or grievances will be promptly and thoroughly investigated by Work Shield. The investigation process will adhere to applicable laws, regulations and internal policies.
- Non-Retaliation: The Company will make every reasonable effort to stop retaliation immediately. No good faith disclosure of corporate or employee-based misconduct shall be used to make any decision to the whistleblower's detriment or to subject the whistleblower to harassment. To encourage and protect good faith reporting of suspected misconduct, it is the Company's policy that no adverse reference to the disclosure be made in personnel files, letters of recommendation, performance evaluations or any other evaluative documents without the concurrence of the whistleblower.
- Reporting Back: Once the investigation is complete, the organization will communicate the findings and actions taken to the extent permitted by law and the need to maintain confidentiality. Reports of alleged misconduct that are unfounded, biased or otherwise not made in good faith are not protected under this policy. Regardless of the origin or the intent of the allegation, in the event the allegation is not substantiated, the Company will take all reasonable steps to restore the reputation of the accused to the extent that it was damaged by the investigation and proceedings. This shall include expunging any reference to the allegation in the personnel record of the accused.

Protection of Whistleblower's Identity:

- Confidentiality: The organization will make every effort to protect the identity of the whistleblower, to the extent permitted by law and the need for investigation. Employees are strongly encouraged not to disclose the details of the reported concern to others.
- Limited Access: Only individuals involved in the investigation and resolution process will have access to the whistleblower's identity. Information will be disclosed on a need-to-know basis.

Definitions

- Whistleblower: is defined by this policy as an employee who reports, to one or more of the parties specified in this policy, an activity that they consider to be illegal, dishonest, unethical, or otherwise improper.

This Policy shall not chill or impede correspondence or communications protected under the National Labor Relations Act, which protects employees' right to discuss workplace conditions and collectively bargain.