



WHISTLEBLOWER POLICY

IIRR expects its trustees, officers, employees, and other representatives to observe high standards in business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of IIRR, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations. It is the responsibility of all trustees, officers, and employees to report Wrongful Conduct in accordance with this Whistleblower Policy.

Definition

“Wrongful Conduct” is defined in this Whistleblower Policy to include: a serious violation of IIRR policy; a violation of applicable national, state or local law; or the use of IIRR's property, resources, or authority for personal gain or other non organization-related purpose except as provided under IIRR policy. This definition of Wrongful Conduct is not intended to be an exclusive listing of the illegal or improper activity encompassed by the Whistleblower Policy. Rather, the Whistleblower Policy is intended to serve as a means of reporting all serious improprieties that potentially impact the integrity and effective operation of IIRR.

Reporting Wrongful Conduct

IIRR encourages its trustees, officers, and employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. Any Trustee, officer, or employee may report Wrongful Conduct to the President or chair of the board of trustees. If the Wrongful Conduct implicates one or both of the President or the president of the board of trustees, or if the reporting individual is not comfortable speaking with or not satisfied with response of the foregoing individuals, the issue may be reported to any member of the board of trustees. The President, chair of the board of trustees, and all members of the board of trustees to whom a report of Wrongful Conduct is made are required to immediately advise the full board of trustees of such report of Wrongful Conduct.

No Retaliation

No Trustee, officer, or employee who in good faith reports Wrongful Conduct will suffer harassment, retaliation or adverse employment consequence. Any trustee, officer, or employee who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to discipline up to and including termination of employment or removal from the board, as applicable. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within IIRR prior to seeking resolution outside IIRR.

Acting in Good Faith

Anyone filing a complaint of Wrongful Conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates Wrongful Conduct. 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

Reports of Wrongful Conduct or suspected Wrongful Conduct may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of Wrongful Conduct or suspected Wrongful Conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Wrongful Conduct

A representative of the board will notify the sender and acknowledge receipt of the reported Wrongful Conduct or suspected Wrongful Conduct within five business days, unless such report was submitted anonymously. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.