

Rocky Mountain MicroFinance Institute Whistle Blower Policy

The purpose of this policy is to establish a procedure for Rocky Mountain MicroFinance Institute (RMMFI) employees to report illegal or dishonest activity or other misconduct involving RMMFI's financial or business affairs.

Such activity may involve another employee or outside persons or firms doing business with RMMFI. Examples of illegal or dishonest activities are violations of federal, state or local laws, billing for services not performed, fraudulent financial reporting or other misconduct involving RMMFI's financial or business affairs.

1. Employee Reporting Process

If an employee has knowledge of or concern of such illegal or dishonest activity or misconduct, the employee should communicate with any of the following:

- His/her immediate supervisor
- Executive Director
- President or Vice-President of the Board of Directors

Any violation involving the Vice President should be reported directly to the Executive Director.

Any violation involving the Executive Director should be reported to either the President of the Board of Directors or the Vice-President of the Board of Directors.

Communications may be verbal or written. No particular format is necessary. However, all communications should include as much information as possible to permit a thorough and complete evaluation of a complaint or charge. This includes material evidence, names or persons able to corroborate the accusations, if possible, and how to contact the complainant to assure anonymity, if anonymity is desired. The recipient of such complaint is responsible for ensuring that all information regarding the complaint is properly recorded and thus becomes the formal record of the complaint. A copy of the written complaint will be provided to the complainant for confirmation of accuracy.

2. Role of the Executive Director

All complaints received under this policy will be promptly submitted to the Executive Director, who is responsible for overseeing the investigation and coordinating corrective actions. The Executive Director will determine the level of investigation the complaint warrants and who the appropriate party is to perform the investigation. The Executive Director is responsible for determining if the facts support or do not support the complaint. The Executive Director will provide a written explanation of the decision to the employee who made the complaint.

The Executive Director in his/her discretion may report to RMMFI's outside general counsel complaints received under this policy, their status and their resolution. The Executive Director is required to report to the President of the Board of Directors regarding RMMFI compliance with this policy.

For violations involving the Executive Director, the President of the Board of Directors will fill the role of the Executive Director and perform the responsibilities identified in the preceding paragraphs and report such complaint to the RMMFI Executive Committee.

A person who believes that his/her report of illegal or dishonest activities or other misconduct involving RMMFI's business or financial affairs is not receiving appropriate attention by the Executive Director may contact the President of the Board of Directors.

3. Employee Responsibility

An employee (whistleblower) who makes a complaint or charge must exercise sound judgment and act without malice to avoid baseless allegations or frivolous complaints. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

4. Employee Protection

RMMFI will not permit retaliatory actions, (e.g. termination, compensation decreases, poor work assignments and threats of physical harm), to be taken against a whistleblower for his/her compliance with this policy. Any whistleblower who believes he/she is being retaliated against for his/her compliance with this policy should contact the Executive Director, or, in the case of perceived retaliation by the Executive Director, the President of the Board of Directors.

Insofar as is reasonable possible, the confidentiality of the whistleblower will be maintained. However, at the discretion of the Executive Director or the President of the Board of Directors, the whistleblower's identity may have to be disclosed to conduct a thorough investigation or to comply with applicable laws.

Any employee, however, who knowingly files a false or materially misleading report of illegal or dishonest activities or other misconduct involving the organization's business or financial affairs, is subject to disciplinary action.

5. Questions

Employees with questions regarding this policy should contact the Vice President.

My signature below indicates my receipt and understanding of this policy.

Employee Signature

Date