



RUTHERFORD Cable OMBUDS PROGRAM

RUTHERFORD Cable believes that open and honest communication is one of the keys of the organizations' success. The board encourages all officers, directors, chairs, committee members, advisors, employees, members, and representatives of RUTHERFORD Cable (all now referred to as members in the program) to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the President is in the best position to address an area of concern. However, if a member is not comfortable speaking with the President or if the member is not satisfied with the President's response, the member is encouraged to speak with any current member of the Board of Directors with whom the person is comfortable approaching. The President and any member of the board of directors are required to report suspected violations to the board and coordinate an investigation with the Ombuds Committee.

In some situations, a member may wish to report a concern anonymously. This may be handled through the Ombuds Program. The goal of the Ombuds Program is to create a confidential process to address potential issues relating to comments, concerns, or behaviors made by members during Rutherford Cable events and to address investigations related to Whistleblower Policy complaints. Note, visitors to Rutherford Cable may also utilize the Ombuds Program to report a potential concern. The organization believes that addressing concerns when they occur is the best way to ensure the vision, mission, and goals of Rutherford Cable move forward.

Steps within the Ombuds Program:

Step 1: Confidential email or call to Rutherford Cable Legal Advisor (Ombuds Intake & Resolution Communication) or an issue is referred to the Legal Advisor (Ombuds Intake & Resolution Communication) for a concern made as part of the Whistleblower Policy via the open-door process.

- I. Member provides details of the concerns via email or call to Legal Advisor (Ombuds Intake & Resolution Communication) or Legal Advisor (Ombuds Intake & Resolution Communication) reaches out to member to follow up on Whistleblower Policy concern.
- II. Legal Advisor (Ombuds Intake & Resolution Communication) reviews and has follow up discussion with the member to gain additional insights and potential people who may have witnessed the concern.
- III. Legal Advisor (Ombuds Intake & Resolution Communication) sends a written summary of the concern to the member to confirm that the concern is summarized accurately.
- IV. Legal Advisor (Ombuds Intake & Resolution Communication) removes any identifying information from the concern (unless the member agrees to share identifying information) and sends the summary to the Ombuds Committee. Note: The ability of the Ombuds Committee to investigate a concern may be impacted by the extent of the confidentiality request.

Step 2: Ombuds Committee reviews and investigates the concern

- I. Ombuds Committee members include: HR Advisor, President-Elect, Governance Director, and two at-large members. The at-large members will be selected by the Ombuds Committee and must be members in good standing (dues paid), have been members for a least two years, and not be a board or committee member.
- II. Should the concern involve a violation of the law or a regulation, the Ombuds Committee will consult with outside counsel.



- III. Should the concern involve an Ombuds Committee member, the member will recuse themselves from the investigation and resolution.
- IV. Committee will enlist the assistance of additional board members or committee chairs if the concern involves their specific area of responsibility. For example, if a concern is raised related to diversity and inclusion, the Ombuds Committee will enlist the assistance of the D&I Director to help investigate and resolve the concern.
- V. Committee meets (virtually and/or in person) to review and investigate the concern.
- VI. Committee interviews potential witnesses, including the subject of the complaint, if possible.
- VII. Committee develops plan to address the concern and sends recommendations to resolve the concern to the Legal Advisor (Ombuds Intake & Resolution Communication).

Step 3: Communication

- I. Legal Advisor (Ombuds Intake & Resolution Communication) communicates resolution plan to member. If the concern was referred to the Ombuds Committee by the board member under the Whistleblower Policy, the referring board member will also receive a copy of the resolution plan.
- II. HR Advisor addresses concerns with involved member or visitor to ensure understand and steps to address the concern.
- III. Ombuds Committee does follow up with both parties after 30 and 60 days to ensure concerns have been resolved.
- IV. A summary of the Ombuds Program issues and concerns will be shared with the board each month.