OREGON FARM BUREAU FEDERATION
WHISTLEBLOWER POLICY
DRAFT

Adopted April 27, 2009

Directors, officers, employees, consultants and volunteers of the Oregon Farm Bureau Federation must observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Everyone in the organization must practice honesty and integrity in fulfilling responsibilities and must comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers, employees, consultants and volunteers to report any "Violation" (fraudulent or dishonest use or misuse of Oregon Farm Bureau Federation's resources or property) or suspected Violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, employee, consultant or volunteer, who in good faith reports a Violation shall suffer adverse consequences for making this report. An employee who takes such action against someone who has reported a Violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower 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 - Employees

In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his/her supervisor or is not satisfied with the supervisor's response, then he/she is encouraged to speak with the Executive Vice President or the organization's Compliance Officer. The Compliance Officer is someone who has specific and exclusive responsibility to investigate all reported Violations. For suspected fraud, or when an employee is not satisfied or is uncomfortable with following this policy, he/she should contact the organization's Compliance Officer directly.

Reporting Violations - Others

Directors, officers, consultants and volunteers should address an area of concern with anyone in the organization that they feel is best able to handle it. In most cases this will be the Executive Vice President. However, if the person is uncomfortable addressing their concerns with the Executive Vice President, then he/she is encouraged to speak

with the organization's Compliance Officer. The Compliance Officer is someone who has specific and exclusive responsibility to investigate all reported Violations.

Compliance Officer

The organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning Violations and, at his/her discretion, shall advise the Executive Vice President and/or the Board of Directors. The Compliance Officer has direct access to the Board of Directors and is required to report to the Board at least annually on compliance activity. The organization's Compliance Officer is appointed annually.

Accounting and Auditing Matters

The Compliance Officer shall immediately notify the Board of Directors regarding all reported concerns or complaints involving corporate accounting practices, internal controls or auditing. The Compliance Officer will work with the Board of Directors until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a Violation or suspected Violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a Violation. 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 Compliance Officer 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.