

KKFI-Mid-Coast Radio Project, Inc.
WHISTLEBLOWER POLICY

PURPOSE: To encourage KKFI employees, volunteers, agents and contractors to disclose any malpractice or misconduct (whistle blowing) of which they become aware and to provide protection for such persons who report allegations of such malpractice or misconduct.

SCOPE: This Whistleblower Policy applies to all employees, including full-time, part-time and temporary employees, volunteers, agents and contractors (collectively, "covered persons") of KKFI and Mid-Coast Radio Project, Inc. 90.1 FM KKFI is a non-commercial, educational, public radio station licensed to Mid-Coast Radio Project, Inc. KKFI and Mid-Coast Radio Project Inc. are referred to collectively herein as "KKFI."

POLICY: The Whistleblower Policy is designed to encourage covered persons to report alleged malpractices or misconduct, to insure that all allegations are thoroughly investigated and suitable action taken where necessary. Any whistle blowing covered person is protected against adverse employment actions, adverse contract action or loss of station privilege (discharge, demotion, suspension, harassment, termination or other forms of discrimination) for raising allegations of business misconduct. A covered person is protected even if the allegations prove to be incorrect or unsubstantiated. Covered persons who participate or assist in an investigation will also be protected. Every effort will be made to protect the anonymity of the whistleblower; however there may be situations where it cannot be guaranteed.

Below are some examples of business misconduct, in each instance related to, involving or otherwise affecting KKFI:

- (a) A criminal offense;
- (b) The use of deception to obtain an unjust or illegal financial advantage, either for the business unit or personally;
- (c) Intentional misrepresentations directly or indirectly affecting financial statements;
- (d) A failure to comply with any legal obligations;
- (e) Danger to the health and safety of any individual;
- (f) A serious breach of fundamental internal control; and
- (g) The deliberate concealment of information tending to show any of the matters listed above.

PROCEDURES

Reporting: A covered person who reasonably believes that business misconduct is occurring should report the business misconduct to a current Designated Executive as listed below.

To preserve anonymity, the whistleblower is not restricted to reporting the issue to a Designated Executive of the KKFI/Mid-Coast Radio Project, Inc. The whistleblower may report the issue to any one of the current Board of Directors, who will report the issue to

a Designated Executive. It will be the responsibility of the Designated Executive who receives the allegation to initiate the inquiry.

All incidents of whistle blowing to a Designated Executive must be reported to the Board Secretary who has to report the occurrence to the Board President of KKFI –Mid-Coast Radio Project, Inc.

INVESTIGATION: Once the claim of malpractice or misconduct is made, the claim will be completely and impartially investigated. Once the investigation is complete, the appropriate company representative will take reasonable steps to inform the whistleblower of the results of the investigation as well as any corrective steps that are being taken, subject in all respects to applicable privacy and/or legal considerations.

SAFEGUARDS: If requested by the whistleblower, all reasonable steps will be taken to protect the anonymity of the whistleblower. However, under certain circumstances, to assist with the investigation the individual's identity may become known or need to be revealed.

DISCIPLINARY ACTION: If the claim of malpractice or misconduct is substantiated, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination or loss of station privilege.

Any act of retaliation or victimization against the whistleblower because of the whistleblowing activity will result in disciplinary action against the responsible individual(s), up to and including termination or loss of station privilege.

The malicious use of the Whistleblower Policy will result in disciplinary action against the whistle blowing complainant, up to and including termination or loss of station privilege.

GENERAL

This policy does not constitute an employment contract or a promise that an employee will be employed for any specified period of time. This policy does not create a vested or enforceable right on behalf of any employee, volunteer, agent or contractor. Employment can be terminated at any time subject to the policies of KKFI – Mid-Coast Radio Project. Radio shows aired on KKFI and programmers assigned thereto can be modified and terminated at any time subject to the policies of KKFI – Mid-Coast Radio Project. Contracts with agents and contractors can be terminated at any time subject to the policies of KKFI – Mid-Coast Radio Project. Nothing in this policy changes or is intended to change or limit the rights of KKFI – Mid-Coast Radio Project to take appropriate employment actions or with respect to the operations of the radio station.

WHISTLEBLOWER POLICY DESIGNATED EXECUTIVES:

Board President – KKFI
Board Vice President –KKFI
Board Treasurer – KKFI
Board Secretary – KKFI