



THE MINNESOTA STREETCAR MUSEUM
COMO-HARRIET STREETCAR LINE
EXCELSIOR STREETCAR LINE

P.O. Box 14467 - UNIVERSITY STATION
MINNEAPOLIS, MINNESOTA 55414-0467
952-922-1096

June 20, 2009

POLICY No. 5

WHISTLE BLOWER POLICY

1.0 General.

1.1 The Minnesota Streetcar Museum, Inc., its subsidiaries and its operating entities, hereinafter called MSM, requires its directors, officers, administrative officers, other representatives, and volunteers and members acting in an official capacity on behalf of the Museum, hereinafter called "personnel," to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All personnel are required to exercise honesty and integrity in fulfilling their responsibilities or in performing their activities, and must comply with all applicable federal, state, and local laws, ordinances and regulations, and MSM policy and procedures.

2.0 Wrongful Conduct.

2.1 The term Wrongful Conduct is defined in this Whistle-Blower Policy to include the following:

- 2.1.1 a serious violation of MSM policy, written rule, Operating Department violation, and generally accepted societal norms regarding observance of common law;
- 2.1.2 a violation of applicable local, state and federal law; or the use of MSM property, resources, or authority for personal gain; or,
- 2.1.3 any other non organization-related purpose except as provided under MSM policy

2.2 This definition of Wrongful Conduct is not intended to be an exclusive or exhaustive listing of the illegal or improper activity encompassed by this Whistle-Blower Policy. Rather, the Whistle-Blower Policy is intended to serve as a basis for reporting all serious improprieties that potentially impact the integrity and effective operation of the MSM.

3.0 Reporting Responsibility.

3.1 It is the responsibility of any and all directors, officers, department heads and volunteers to report any Wrongful Conduct in accordance with this Whistle Blower Policy. Failure to do so shall be regarded as a violation of the Whistle Blower Policy.

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4.0 No Retaliation Clause.

- 4.1 No MSM director, officer, department head, or volunteer who in good faith reports Wrongful Conduct will suffer whatsoever any harassment, retaliation, or adverse disciplinary action that might result from reporting wrongful conduct. Any director, officer, department head, or volunteer who retaliates against any person who has reported Wrongful Conduct in good faith is subject to discipline up to and including removal from office, dismissal from their leadership position, or termination of membership in MSM, as applicable. This Whistle-Blower Policy is intended to encourage and enable personnel to raise serious concerns within the MSM prior to seeking resolution outside the MSM.

5.0 Reporting Wrongful Conduct.

- 5.1 MSM requires its directors, officers, department heads, and volunteers to report their questions, concerns, suggestions, or complaints with someone who can address them properly. Any person may report Wrongful Conduct to the Chairman of the Board of Directors, the General Superintendent of MSM, or the Excelsior Superintendent.
- 5.2 If the Wrongful Conduct implicates one or more of the Chairman of the Board of Directors, the General Superintendent of MSM, or the Excelsior Superintendent, or if the reporting individual is not comfortable speaking with, or not satisfied with the response of the foregoing individuals, the issue may be reported to any member of the Board of Directors.
- 5.3 The Chairman of the Board of Directors, the General Superintendent, or the Excelsior Superintendent, or any or all members of the Board of Directors, to whom a report of Wrongful Conduct is made, is required to immediately advise the full Board of Directors of such report of Wrongful Conduct, within one (1) business day.

6.0 Acting in Good Faith.

- 6.1 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 by the maker of the Wrongful Conduct complaint.

7.0 Confidentiality.

- 7.1 Reports of Wrongful Conduct or suspected Wrongful Conduct shall be submitted on a confidential basis by the complainant in writing, by a telephone call followed-up in writing, or by e-mail. Reports of Wrongful Conduct or suspected Wrongful Conduct shall be kept strictly confidential, consistent with the need to conduct an adequate investigation.

8.0 Handling of Reported Wrongful Conduct.

- 8.1 A designated representative of the Board of Directors will notify the complainant and acknowledge receipt of the reported Wrongful Conduct, or suspected Wrongful Conduct, within five (5) business days, unless such report was submitted anonymously.

Anonymous reports of Wrongful Conduct may not be actionable in the absence of witnesses, but if the information submitted is proven to be materially substantive, the authorities responsible for such action shall use the information provided for the best good of the Society.

- 8.2 All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The investigation shall be carried out by the General Superintendent or the Excelsior Superintendent, or some other person, or persons, as appointed by the Board of Directors as the circumstances warrant. Such appointment shall be fully recorded and made through a telephone or e-mail poll of the directors if a meeting of the directors is not held for the purpose.

Approved by the Board of Directors at its meeting on June 20, 2009.

ATTEST:

James A. Vaitkunas

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Corporate Secretary