



Chapter 02

President Office Policy

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02.001 – Policy And Procedure Policies

Policies and procedures are the structured process that guides how the campus operates. They ensure consistent application across the institution. Policies and procedures shall have campus-wide application.

Definitions

Policies reflect the “rules” governing the implementation of campus processes.

Procedures are the “guidelines” which represent an implementation of the policy. Policies and procedures shall have campus-wide application.

Oversight

The Vice President of Business Affairs is responsible for maintaining the policy and procedures storage repository and coordinating the creation, review, and approval of the President, Executive Board, and Eastern Board of Regents.

Publication

The Policies and Procedures Manual is available online at <http://eosc.edu>. This online version will be the official and most current version.

No duplicate versions of policies are permitted on websites or in printed form. All references should point to the online version.

Organization of Policies and Procedures

Policies are grouped by broad administrative functions. The highest-ranking leader in each category, the Responsible Officer, is in charge of policy development, authorization, and implementation. The categories include:

- Board of Regents
- President
- Academic Affairs
- Business and Fiscal Affairs
- Student Life Services
- Personnel
- Information Technology
- Marketing and Communications
- Campus Safety and Security
- Library
- Athletics

Review and Updates

Responsible Officers are responsible for ensuring their policies are up-to-date and undergo review at least every two years.

Any employee can suggest modifications if there are changes in state or federal laws or campus processes. Suggestions should be directed to the relevant Responsible Officer.

Approval Process

Policies and Procedures must be reviewed and approved by the Leadership Council. Depending on the complexity of the changes, additional approval levels, may be required.

Once approved the Vice President of Business Affairs will notify the Director of Marketing to post the updated policies to the website for all policies and procedures other than the Student Handbook, Academic Catalog, and the Faculty Handbook.

The Vice President of these three (3) areas will notify the Director of Marketing to post the updated policies to our website along with sending a copy to the Vice President of Business Affairs.

02.002 – Open Records Request

As a public college, Eastern Oklahoma State College (“Eastern”) is subject to the Open Records Act. This law is set out in Title 51, Section 24 of the Oklahoma State Statutes, as amended.

Eastern is committed to upholding the principles of transparency and accountability by adhering to the Oklahoma Open Records Act. In alignment with this commitment, Eastern has established a policy to ensure public access to records related to its business operations. This policy outlines the procedures for requesting, reviewing, and copying records thereby guaranteeing that the public’s right to access information is fully protected and facilitated.

Open Records Request Policy

In promoting transparency in its operations, Eastern also has a legal obligation to restrict public access to certain records. These include records that are confidential, privileged, non-discoverable, or of private interest to individuals, as well as any information restricted by state or federal laws. Records in these restricted categories include, but are not limited to, the following:

- Personnel records of employees.
- Individual student records.
- Personal communications about individual students.
- Contents of sealed bids prior to date established for public opening.
- Records controlled by confidentiality.
- Donor records.
- Computer software and programs.
- Records of meetings that occurred during lawfully closed meetings as authorized under the Oklahoma Open Meeting Act.
- Records protected under law, such as attorney-client and physician-patient.
- Material gathered in anticipation or preparation for trial or adversarial administrative proceedings.
- Teacher lesson plans, tests, and other teaching materials.

The format of the information being supplied will be determined by Eastern to be the most appropriate and least disruptive to the functions of the departments providing the information.

Eastern does not accept the following types of records requests:

- Continuing requests with an indefinite ending date, and
- Requests requiring responsive records up to the date of production.

Eastern has the capacity to provide the following types of records including, but not limited to:

- Paper records
- Electronic communications
- Audio and video files
- Text messages on state-issued phones
- Calendar entries
- Facebook
- Twitter, and
- LinkedIn

Eastern can conduct searches for sent and received electronic communications in the following manner:

- Named organizations or individuals
- Identified cell phone numbers
- Specific email addresses
- Email domains

If you do not have a specific name, number, or email address, please provide relevant search terms and (a) timeframe(s) for Eastern to narrow the search.

To protect Eastern's IT system, Eastern does not accept flash drives from requesters.

To eliminate unwanted electronic communications, requestors may elect to exclude news or listserv correspondence or alerts from bulk media sources.

Open Records Request Fee Policy

Please note the following Eastern policy concerning fees:

Requests may be subject to fees for the costs of record searches and copies in accordance with the fee schedule on file with the Latimer County Clerk, Pittsburgh County Clerk, Pushmataha County Clerk, and McCurtain County Clerk and listed below:

Pursuant to 51 O.S.2021, § 24A.5(4), Eastern may elect to charge a reasonable fee to cover direct costs of copying or mechanical reproduction of records subject to the Act. In addition, if the

request is solely for a commercial purpose or would clearly cause excessive disruption of Eastern's essential functions, Eastern may charge an additional fee to recover its direct costs of record search and copying. Further, Eastern reserves the right to waive any fee(s) when the office believes the public interest outweighs an excessive disruption of office functions. Those submitting a request subject to additional recovery costs will be provided with an estimate and a fee responsibility acknowledgment that must be completed before work begins.

Eastern will determine in consultation with the ORA designee(s), if any additional recovery costs should be charged to the requestor. Eastern will also coordinate preparation of an estimate of costs for the requestor. All fees for copies, including delivery fees, must be paid by cashier's check or money order, payable to Eastern, before the documents are provided.

The imposition of fees will not be used for the purpose of discouraging requests for information or as obstacles to the disclosure of requested information.

Open Records Request Procedures

Requests for copying and document review should be submitted through openrecordsrequest@eossc.edu using the Open Records Act Request. The Vice President of Business Affairs in collaboration with the President, will coordinate with the relevant department(s) to process the request. In certain cases, requests may be referred to the Office of Legal Counsel for guidance on accessibility.

02.003 – Campus Closures

During inclement weather or other emergencies, Eastern will make a decision whether or not to close campus based on all available information.

The decision as to if weather conditions warrant canceling classes and closing campus offices is made through Eastern's Leadership Team.

Campus Closure Policy

The Eastern website, email, emergency alert system, and our social media networks are the official means of communicating all information concerning weather-related closings. Local television and radio stations will be notified but should not be relied upon for accuracy.

When necessary, the college will announce a separate decision about canceling night classes (those classes starting at 4:30 p.m. or later) by 2:00 p.m., if possible.

When the Eastern campus is closed due to inclement weather or other emergency situations all on-campus events and activities scheduled during this period are canceled. Request for exception should be addressed through the President by the appropriate responsible department.

In instances in which Eastern must close its campus or cancel in-person instruction due to inclement weather or other emergencies, the institution's online classes will take place as planned. Classes that normally meet on campus may continue at the discretion of the faculty, via online assignments or other electronic distance learning means.

Due to varying travel conditions some circumstances may warrant a separate decision for remote learning sites. These decisions will be communicated through the same means as above.

If inclement weather conditions create hazardous road conditions or if other emergency situations arise the college may announce that campus operations will move to a virtual/remote workday. Vice Presidents are responsible for ensuring that necessary services are provided in their respective areas when campus is closed and working virtual or remote. Employees who are not required to work on campus or remotely when the campus is closed, will be granted authorized administrative leave.

If campuses are closed due to inclement weather or other emergency situations, those employees recognized as “essential personnel” may still be required to report to campus. Eastern considers all of its employees as essential however for the purposes of this policy “essential personnel” are defined as those individuals who provide services that directly relate to the health, safety, and welfare of the college and ensure continuity of key operations. Essential employees who must physically work on campus during a campus closure will be paid administrative leave in addition to the time worked.

Any employee who does not report when the campus is open for normal operations will be charged annual/compensatory leave or leave without pay.

Road conditions and weather conditions vary from place to place so employees and students are expected to exercise good judgement regarding the safety of travel when road conditions are affected by weather.

Campus Closure Procedures

The Eastern Chief of Police will serve as the lead in coordinating the assessment of the severity of weather conditions and analyzing data from the National Weather Service along with other agencies and departments as needed.

When possible, the decision to close campus or delay opening shall be made by 5:00 a.m. so that official information may be posted on the Eastern website by 6:00 a.m.

The Director of Marketing will communicate all delays or closures to students and employees through Eastern’s website and social media. The Chief of Police will be responsible for notifications made through email and emergency notification systems.

In the event of conflicting media information, the Eastern website will be considered the principal source of official information.

02.004 – Authorized Signature Policy

This policy provides for oversight and responsible stewardship of the resources of the College. This policy outlines the authority and procedures for signing contracts on behalf of Eastern Oklahoma State College to ensure proper governance, risk management, and accountability.

This policy applies to all contracts, agreements, memoranda of understanding, and other binding documents (hereinafter referred to as “contracts”) entered into by Eastern Oklahoma State College.

Definitions

- **Contract** – Any agreement with external parties that creates obligations for the college.
- **Authorized Signatory** – An individual who has been granted authority to sign contracts on behalf of the College.

Authorized Signatures

- **President** – Has the broadest authority to sign all contracts, land sales, and closing documents once approved by the Eastern Board of Regents approved agenda items.
- **Vice President of Business Affairs** – Authorized to sign contracts related to financial operations, procurement, employee contracts, and administrative services.
- **Vice President of Academic Affairs** – Authorized to sign contracts related to academic programs, faculty agreements, employee contracts, and academic services (no longer than 12 months).
- **Vice President of Student Affairs** – Authorized to sign entertainment agreements (no longer than 12 months), student activities agreements, employee contracts, and housing lease contracts.
- **Director of Human Resources** – Authorized to sign employment-related contracts.

Delegation of Authority

The President may delegate signing authority to other College officials in writing, specifying the scope and limitations of such delegation not to exceed 12 months. Delegation must be documented and approved by the Eastern Board of Regents.

Record Keeping of Contracts

A copy of all signed contracts must be maintained by the Vice President of Business Affairs. Contracts must be retained in accordance with the College’s records retention policy.

Compliance and Enforcement

Any individual signing a contract without proper authorization may be subject to disciplinary action, up to and including termination.

02.005 – Financial Exigency

This policy statement establishes the procedures and guidelines for addressing a state of financial exigency at Eastern Oklahoma State College. It will supersede other College policies and procedures, including all grievance procedures, if the President of the College declares a state of financial exigency. These policies will yield in any cases of conflict between these policies and those required by law or by the Oklahoma State Regents for Higher Education.

Definition of Financial Exigency

Financial exigency shall mean that state of financial crisis brought about by an Educational and General Part I budget allocation to the College and/or significant shortfall in total College funding, which would:

- Necessitate the elimination or reduction of existing instruction programs.
- Necessitate the termination of employment or reduction of compensation for permanently employed faculty or staff prior to the normal expiration of their contract or appointment.
- Seriously erode the quality of any existing program.

Financial Exigency Committees

The Financial Exigency Committee shall be composed of the President, who shall serve as Chair, the Vice Presidents, and other designees as may be deemed appropriate at the time. At the time of the adoption of these policies and procedures the committee shall include the incumbents of the following described positions. Thereafter, the President may adjust the membership.

- Vice President of Academics Affairs
- Vice President of Business Affairs
- Vice President of Student Affairs
- Dean of McAlester Campus
- Director of Human Resources
- Director of the Physical Plant Operations
- Faculty Council Chair
- Staff Council Chair
- One (1) elected representative of the Division Chairpersons
- Athletic Director

In addition, the President may appoint to the committee such other faculty, staff, or students to assure appropriate representation of all groups within the College community. The purpose of the Financial Exigency Committee is to recommend budget alterations, including those involving personnel to the President.

The Termination Review Committee

The Termination Review Committee shall be composed of a chair and six (6) members, three (3) of whom shall be faculty members and three (3) of whom shall be staff. The Vice President of Academic Affairs shall determine two (2) of the faculty members of the committee by random selection from among faculty with three (3) years of more of service, and one (1) faculty member of the committee from among other faculty. Any faculty member so chosen may decline to serve.

When the committee considers the appeal of a faculty member whose termination is proposed, the Vice President of Academic Affairs shall chair the proceedings; when the committee considers the appeal of a staff member whose termination is proposed, the Vice President of Business Affairs shall chair the proceedings. All members shall be voting members. The purpose of the Termination Review Committee is to review terminations under exigency and make recommendations to the President as to their justification.

Financial Exigency Policy and Procedures

Declaration – When, in his/her opinion, a state of financial exigency is impending, the President, in consultation with the Executive Council and the Chair of the Board of Regents, shall declare the College to be in a state of financial exigency.

Preliminary Action Plan – Following the declaration, the President shall convene the Financial Exigency Committee and charge it with the responsibility of conducting appropriate studies and review to determine the nature and extent of the crisis and developing a Preliminary Action Plan to return the College to a stable financial state. Upon completion of its evaluation, the Financial Exigency Committee shall prepare and recommend its Preliminary Action Plan to the President.

Exigency Action Plan – The President shall review and consider the Preliminary Action Plan and seek such other advice and counsel from faculty, staff, students, and other interested parties, as he/she shall deem appropriate. Any advice and counsel shall be advisory only, and it shall remain the sole responsibility of the President to make final decisions regarding recommendations to the Board of Regents concerning the financial exigency. Following such deliberation, the President shall prepare and submit to the Board of Regents an Exigency Action Plan for alleviating the financial crisis at the College.

Action by the Board of Regents – The Board of Regents has ultimate responsibility for the financial integrity of the College. It will review the Action Plan submitted by the President and may consider such other factors as it deems appropriate in determining what actions should be taken to restore the College to a stable financial state. Any Action Plan adopted by the Board of Regents will not identify specific faculty or staff for termination but may identify budgetary goals and areas for reduction.

Action Plan Implementation – Following adoption by the Board of Regents, the President shall direct the executive officers to implement the provisions of the approved Action Plan. If the plan entails the reduction of programs, activities of services, or the termination of faculty or staff, then the following appropriate provision of this policy shall apply.

Financial Exigency Guidelines

Termination of Employment – In reviewing programs and activities for reorientation, reorganization, realignment, reduction, or termination the mission of the College and the fulfillment of its obligations as a higher education institution shall remain paramount. As the Financial Exigency Committee and other units develop their respective plans, they should consider such factors as centrality to the College's mission, productivity, support of productive programs, cost-benefit relationship, program achievement, and/or income generating ability. This may, in some cases, necessitate the retention of programs, services, and activities which are not strong, but which are central to the concept of the College and to the mission of Eastern Oklahoma State College.

Program Deletions – If an academic program at the College is discontinued, students in the program shall be notified and every effort shall be made to allow them to finish their academic work. If it is not possible for students to complete the program, the College will explore making special allowances for such students. Special allowances might include such actions as

permitting students to complete programs by taking work in related departments, assisting them to locate the same program at other institutions, or other means of meeting the academic needs of affected students.

Personnel Reduction – Anyone terminated may appeal in writing to the Termination Review Committee to reverse its decision. Such an appellant does not have a right to a hearing before the committee. As such a review by the Termination Review Committee will recommend either termination or continuance of the person to the President. The President’s decision will be final.

02.006 – Weapons and Firearms Policy

The possession of weapons on campus is regulated by state law; all weapons are prohibited on any college campus. This is to include, but not limited to, the possession or use of weapons, firearms, ammunition, fireworks, explosives, and dangerous chemicals on campus, in Eastern Oklahoma State College vehicles, or on Eastern Oklahoma State College sponsored trips.

Exceptions to this policy are police and peace officers employed by Eastern and those who have been called to assist or to perform law enforcement duties on campus, police and peace officers in their official non-duty capacities and in the performance of their duties. Collegiate Officer Program students during supervised skills training are exempt.

Persons who are licensed to carry concealed handguns pursuant to the Oklahoma Self Defense Act are authorized by that Act to enter the grounds of Eastern Oklahoma State College with such handguns only if the handguns are always concealed and stored in the licensee’s motor vehicle. No handgun may be removed from such concealed storage while the vehicle is on Eastern Oklahoma State College property. Any exceptions are pursuant under state law.

Items used for instruction or training purposes are not considered weapons under this policy.

02.007 – Designation of Public Notice for Board Meetings

This policy establishes the designated locations for posting public notices of Board of Regents meetings for Eastern Oklahoma State College (Eastern), ensuring compliance with public access requirements.

Designated Physical Locations for Public Notice

Public notices regarding meetings of the Eastern Board of Regents shall be posted at the Eastern campus, located at 1301 West Main, Wilburton, OK 74578, in the following locations:

Primary Posting Location

On the front and back door at the Bill H. Hill Library & Administration building to allow twenty-four (24) hours public viewing from outside.

Alternative Posting Locations (if needed)

If the Bill H. Hill Library & Administration building is blocked, notices will be posted at the front and back door of the E.E. Tourtellotte building.

Online Posting and Statutory Compliance

Public notices will also be posted:

On the Eastern website at www.eosc.edu/about/administration.

With the Offices of the Secretary of State in accordance with Oklahoma Statute requirements.

Authorized Personnel for Posting Public Notices

Only personnel from the President's Office are authorized to post public notices, both on-campus and online.

This policy ensures transparency, accessibility, and compliance with public notice requirements for all Board of Regents meetings.

02.008 – Workplace Wellness Policy

Eastern Oklahoma State College (Eastern) cares about the health and well-being of our employees and strives to create an environment that supports and encourages healthy living. We acknowledge that people who are inactive, overweight, or obese have a higher risk for many serious health conditions, including diabetes, heart disease, stroke, certain types of cancer, and premature death. We recognize that we can help improve the health and wellness of our employees, and members of the community, by providing and promoting healthy food and physical activity.

Therefore, we commit to creating a workplace environment that is conducive to eating healthy and being physically active by doing the following:

- Providing support for a wellness committee as needed for the implementation of the wellness policy.
- Making healthy choices is easier by providing access to healthy food and beverage options and opportunities for physical activity.
- Promoting healthy options through communication resources.
- Conduct ongoing evaluations of wellness policies and programs.
- Hosting, sponsoring, and promoting community health events.
- Adopting the following Nutrition and Physical Activity elements.

Nutrition

Eastern Oklahoma State College commits to making healthy food options widely available and easily accessible by doing the following:

- Encourage vendors to use healthier cooking techniques such as steaming, baking, roasting, and grilling.
- Encourage vendors to offer a variety of dishes in which vegetables or fruits are the main ingredients.
- Encourage vendors to serve condiments and dressings on the side.

- Encourage vendors to serve foods that are appropriate for the audience and event.
- Encourage vendors to price non-nutritious foods and beverages at a higher cost than nutritious foods and beverages.
- Encourage vendors to identify healthy food and beverage menu items with signs, symbols, and/or colors.
- Encourage vendors to include healthy food and beverage options in catered meals.
- Encourage vendors to provide nutritional information on foods and beverages sold and offered in the workplace.
- Provide nutrition education through activities such as seminars, workshops, classes, meetings, and/or newsletters.
- Make cool drinking water available throughout the day at no cost.
- Provide employees with access to a refrigerator, microwave, and sink with a water faucet.
- Use individual or team competitions or challenges in combination with additional interventions to support employees making healthier choices (e.g., fruit and vegetable challenge, hydration challenge.)
- Encouraging employees to bring healthy foods to special occasions or to celebrate with non-food items.
- Using tailored health promotion communications to ensure that they are accessible and appealing to employees of different ages, genders, educational levels, job categories, cultures, language, or literacy levels.

Physical Activity

Eastern Oklahoma State College commits to making physical activity opportunities widely available and easily accessible by doing the following:

- Allowing employees to combine two fifteen (15) minute paid breaks into a single thirty (30) minute paid physical activity break in addition to their regularly scheduled lunch break.
- Encourage supervisors to provide flexible work arrangements to accommodate paid physical activity breaks.
- Providing technology-based support to increase physical activity, such as device-based coaching or challenges.
- Provide information about local resources and facilities, such as walking trails, parks, and recreation facilities.
- Promote stairwell use throughout the workday by making stairs appealing or posting motivational signs.
- Use communication tools to promote physical activity.
- Promote short activity breaks throughout the workday.
- Use individual and team competitions or challenges in combination with additional interventions to support employees making healthier choices (e.g., steps challenge, exercise minute challenge).
- Consider and/or implement community/shared use policies with other organizations.
- Promote walking meetings.

02.009 – Minors on Campus Policy

Purpose and Scope

Eastern Oklahoma State College (Eastern) is committed to providing a safe and supportive environment for all individuals on campus, including minors. This policy outlines the requirements for all programs, events, and activities that involve minors on campus. It applies to all faculty, staff, students, volunteers, and contractors who may interact with minors through college-sponsored events, camps, or activities.

Definitions

Minor: Any individual under the age of 18 who is not enrolled as a full-time student at Eastern.

Authorized Adult: An individual over the age of 18 who has been designated to supervise minors. This includes faculty, staff, students, volunteers, and contractors involved in programs with minors.

Direct Supervision: Continuous line-of-sight oversight of minors by an Authorized Adult.

Registration and Approval Process

All programs or activities involving minors must be registered with and approved by the Office of Student Affairs. Program leaders must submit details of the planned activities, locations, dates, and a list of Authorized Adults to ensure compliance with this policy.

Supervision Requirements

A minimum Authorized Adult-to-minor ratio is required at all times during activities involving minors:

- 1:10 for minors aged 13–17
- 1:8 for minors aged 6–12
- 1:4 for minors under age 6

Authorized Adults must have completed a background check and necessary training as outlined in this policy. Additionally, one-on-one interactions between Authorized Adults and minors are prohibited unless they occur in a visible, public setting.

Behavioral Expectations and Code of Conduct

Authorized Adults must adhere to the following guidelines when interacting with minors:

- Refrain from any form of physical, verbal, or emotional abuse.
- Avoid physical contact unless it is necessary for the minor's safety or wellbeing.
- Maintain appropriate boundaries and refrain from personal communication outside of the program.
- Never provide transportation to minors unless part of an official, pre-approved college activity.

Background Checks and Training

All Authorized Adults participating in programs involving minors must complete a criminal background check and participate in training focused on recognizing and preventing child abuse, as well as understanding Eastern's policies and emergency protocols. Background checks are to be renewed every three (3) years.

Reporting Obligations

Any Authorized Adult who suspects or observes abuse or misconduct involving a minor must immediately report it to Eastern Campus Police at 918.448.2365 and inform the Office of Student Affairs. Eastern is committed to following all applicable laws related to mandatory reporting of child abuse and neglect.

Emergency Procedures

In the event of an emergency, Authorized Adults must follow Eastern's established emergency protocols, including:

- Notifying Eastern Campus Police at 918.448.2365.
- Contacting the parents or guardians of affected minors as quickly as possible.
- Assisting with evacuations as needed, ensuring that minors are safe and accounted for.

Documentation and Record Keeping

Programs involving minors must maintain the following records for a minimum of three (3) years:

- Parental consent forms
- Emergency contact information for each minor
- Health and medical information, as needed
- Attendance records and incident reports

All records should be submitted to the Office of Student Affairs at the conclusion of each program.

Compliance and Enforcement

Program leaders are responsible for ensuring compliance with this policy. Violations may result in disciplinary action, including but not limited to, suspension of the program, removal from the college, or legal action where applicable.

Miscellaneous Provisions

This policy applies to all on-campus programs as well as any off-campus events conducted under the college's name. Exceptions to this policy require prior written approval from the Office of Student Affairs.

Review and Revision

The Minors on Campus policy will be reviewed every three (3) years by the Office of Student Affairs in collaboration with Eastern Campus Police and updated as needed.

Requirements for External Groups

External groups renting Eastern facilities for events or programs involving minors must adhere to the following requirements:

Compliance with Eastern Policies

External groups are required to comply with the Eastern Minors on Campus policy, including supervision requirements, background checks, and reporting obligations. They must provide Eastern with a written acknowledgment of their understanding and commitment to follow this policy.

Supervision and Safety

External groups are responsible for maintaining appropriate supervision ratios as outlined in this policy. They must also ensure that all staff and volunteers have completed the necessary background checks and training specific to working with minors.

Insurance and Liability

All external groups must provide a certificate of insurance that meets Eastern's requirements, including coverage for incidents involving minors. The group may also be required to sign a liability waiver and indemnification agreement, holding Eastern harmless for any incidents that occur during their use of the facilities.

Documentation and Record Keeping

External groups are responsible for maintaining records of parental consent forms, health information, and emergency contacts for all minors involved in their program. Copies of these documents must be available to Eastern upon request.

Reporting Obligations

In the event of any incident involving the safety or welfare of a minor, external groups are required to report the incident immediately to Eastern Campus Police and the Office of Student Affairs. They must also follow state-mandated reporting procedures for any allegations of abuse or neglect.

Failure to Comply

Eastern reserves the right to deny or terminate facility access for external groups that fail to comply with the Minors on Campus policy. Non-compliance may result in cancellation of future rental agreements and potential legal action if warranted.

02.010 – Whistleblower Policy

Eastern Oklahoma State College holds its officers, directors, volunteers, and employees to high standards of business and personal ethics in fulfilling their duties. These individuals are expected to act with honesty, integrity, and in compliance with all applicable laws, regulations, and

policies. This Whistleblower Protection Policy applies to all individuals associated with Eastern, including full-time, part-time, temporary employees, and contractors.

Reporting Responsibility

It is the duty of everyone affiliated with Eastern to report any concerns about potential violations of policies, unethical conduct, or breaches of laws or regulations. This policy is designed to encourage and enable individuals to report such concerns internally, allowing Eastern to address and rectify inappropriate actions or behavior.

Reporting Procedure

Eastern has designated its Vice President of Business Affairs as the Compliance Officer, responsible for investigating complaints (except those involving the Compliance Officer). Concerns about potential violations should be submitted in writing to the Compliance Officer. Alternatively, reports may be directed to the President who will forward them to the Compliance Officer. If the complaint involves the Compliance Officer, it should be directed to the President who will investigate or assign an appropriate officer to handle the matter. While individuals are encouraged to identify themselves when reporting to facilitate investigations, anonymous reports are also accepted.

Confidentiality and Investigation

The Compliance Officer ensures that all reports are promptly investigated, maintaining confidentiality as much as possible. Legal counsel may be consulted to determine corrective actions or whether external entities, such as law enforcement, should be notified. The Compliance Officer will provide the President with a confidential written report detailing the investigation's status and resolution.

No Retaliation and Good Faith Reporting

Eastern prohibits retaliation, intimidation, or harassment against anyone who reports a suspected violation in good faith or cooperates with an investigation. Individuals who retaliate will face disciplinary action, up to and including termination or removal from their position. Reports must be made in good faith with reasonable grounds for suspicion. If a report is found to be malicious or knowingly false, the reporting individual may face disciplinary action, including termination or removal from their role.