

# KREMMLING SANITATION DISTRICT

## Policy on Whistleblower Protection

Adopted: January 12, 2026

1. Purpose. This Whistleblower Policy (the “Policy”) is adopted to encourage the reporting of Improper Governmental Actions of the Kremmling Sanitation District (the “District”) without fear of retaliation, ensure compliance with applicable Colorado and federal law, and establish clear reporting, investigation, and non-retaliation standards consistent with industry best practices.
2. Definitions.
  - a. “Improper Governmental Action” has the same meaning as C.R.S. § 24-50.5-102(2) and includes actions by the District or any of its officers, employees, contractors or agents that violate state or federal law, constitute mismanagement, abuse of authority, or gross waste of public funds, or pose a substantial and specific danger to public health or safety.
  - b. “Good Faith Report” means a report made with a reasonable belief that the information disclosed evidences an improper governmental action.
3. Authority. This Policy is adopted pursuant to, and shall be interpreted consistently with the:
  - a. Local Government Whistleblower Protection, C.R.S. § 24-50.5-101 *et seq.*
  - b. Prohibited personnel practices/retaliation, C.R.S. § 24-50.5-103.
  - c. Colorado Open Records Act (“CORA”), C.R.S. §§ 24-72-201 *et seq.*
  - d. Colorado Criminal Code (where criminal conduct is alleged) C.R.S. Title 18.
  - e. Federal whistleblower protections, as applicable, including 41 U.S.C. § 4712
4. Retaliation Prohibited. The District prohibits retaliation against any employee, officer, contractor, or agent who, in Good Faith, reports an Improper Governmental Action or participates in an investigation related to such a report. Reports may be made without fear of adverse employment action, discipline, harassment, or discrimination, consistent with C.R.S. § 24-50.5-103.
5. Reporting Procedures. Reports may be made to the District Manager, Board President, District’s legal counsel, or appropriate external authority, including law

Kremmling Sanitation District  
Policy on Whistleblower Protection

enforcement or regulatory agencies, as permitted by C.R.S. § 24-50.5-103. Reports may be oral or written and should include sufficient detail to allow for evaluation and investigation. Anonymous reports will be accepted to the extent practicable.

6. Complaints and Investigation. This Policy shall be enforced by the District Manager, who is responsible for overseeing training, implementation, and resolution of concerns. Violations may result in disciplinary action, legal liability, or referral to the appropriate enforcement agencies.
  - a. Complaint Submission. Complaints shall be submitted in writing to the District by mail, email, or by using a designated form provided by the District. The complaint should include a detailed description of the incident(s), the parties involved, the date(s), and any supporting evidence. Anonymous complaints will be reviewed to the extent possible, but may limit the District's ability to fully investigate.
  - b. Investigation Procedure. Upon receipt of a complaint, the District Manager shall promptly acknowledge receipt and initiate a confidential investigation. The investigation will be conducted fairly and impartially, with an opportunity for all parties to provide information and evidence. The District shall, at the earliest possible opportunity, confer with its legal counsel to determine if a third-party investigator is necessary.
  - c. Resolution and Action. The District Manager shall issue a written determination summarizing findings and any actions taken, and notify the complainant and respondent, where appropriate. If a violation of this Policy is substantiated, corrective or disciplinary measures may be taken, including mediation, training, suspension of privileges, or referral to legal authorities.
7. Non-retaliation. Retaliation against an individual for making a good faith report or participating in an investigation is strictly prohibited and constitutes a violation of C.R.S. § 24-50.5-103. Individuals who believe they have been subjected to retaliation may pursue remedies available under C.R.S. § 24-50.5-104, including civil action where authorized by law.
8. False or Malicious Reports. Knowingly false or malicious reports are not protected under this Policy and may be cause for corrective action.
9. Supplement to Law. The provisions of this Policy shall be in addition to and in supplement of any law of the State of Colorado.
10. Amendment. The Board may amend this Policy from time to time, only in writing following a duly called meeting.