



Subject/Title: Whistleblower Protection
Policy Number: 1.04
Date First Adopted: November 21, 2014
Date Revised: October 2, 2020

A. PURPOSE

This policy, providing guidelines for whistleblower protection, applies to any individual acting on behalf of the Foundation.

B. POLICY

This whistleblower policy imposes strict standards to prevent fraud and dishonesty. The submission of concerns regarding questionable accounting or audit matters by employees, directors, officers, and other stakeholders of the Foundation may be made on a confidential and anonymous basis. Retaliation against any member of the Board, volunteers, or University employees reporting concerns is prohibited and may subject an individual accused of retaliation to sanction up to and including termination or civil or criminal referral.

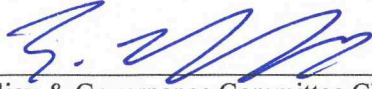
C. PROCEDURES

1. Any potential impropriety should be reported to the CEO.
2. If the potential impropriety involves the CEO then the matter should be addressed to the University President.
3. Upon receipt of an allegation, the individual receiving the information will notify the OGC which will ensure there is an investigation of all credible allegations.
4. The OGC shall report the findings of the investigation back to the CEO or to the University President, as appropriate, while respecting the privacy of those involved in the matter.
5. A report of complaints, investigations, and actions shall be made to the University's and Foundation's designated audit committees.
6. There will be no punishment or retaliation against individuals reporting potential issues consistent with this policy.

POLICY APPROVAL

Policy: 1.04 – Whistleblower Protection

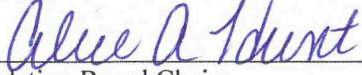
Approval Date: Revision - October 2, 2020



Policy & Governance Committee Chair

10/22/2020

Date



Foundation Board Chair

11/28/2020

Date