



## II. Intent of Policy

- A. This policy is intended to protect any individual who engages in good faith disclosure of alleged wrongful conduct to a designated Company official or public body. More specifically it:
1. Encourages all individuals to engage in conduct that is lawful and in accordance with company policy and business ethics,
  2. Encourages individuals to disclose wrongful conduct engaged in by others to the appropriate Company official so that prompt, corrective action can be taken by the Company,
  3. Informs individuals how allegations of wrongful conduct can be disclosed,
  4. Protects individuals from reprisal by adverse employment action or other retaliation as a result of having disclosed wrongful conduct (individuals who self report their own misconduct are not afforded protection by this policy), and
  5. Provides individuals who believe they have been subject to reprisal or false allegations a fair process to seek relief from these acts.
- B. Any communication that proves to have been both unsubstantiated and made with malice or with knowledge of its falsity is not protected by this policy. This policy is also intended to protect individuals against false allegations of wrongful misconduct.
- C. Nothing in this policy is intended to interfere with legitimate employment decisions.

## III. Regulations

- A. **Acting in good faith.** Anyone making a protected disclosure or filing a complaint concerning a violation or suspected violation of this policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policy.
- B. **False allegation.** Any employee who knowingly or with reckless disregard for the truth gives false information or knowingly makes a false report of wrongful conduct or a subsequent false report of retaliation will be subject to disciplinary action, up to and including termination. Allegations not substantiated are made in good faith are not subject to corrective action.
- C. **Retaliation.** No individual who makes a protected disclosure will suffer harassment, retaliation, or adverse employment consequences as a result of making that protected disclosure. Any person who retaliates against any individual who makes a protected disclosure is subject to discipline up to and including termination. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Company prior to seeking resolution outside the Company.
- D. **Confidentiality.** Protected disclosures may be made on a confidential basis by the complainant or may be submitted anonymously through the Company's reporting line. Protected disclosures and investigatory records will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- E. **Handling Protected Disclosures.** The office (listed in Procedure Section IV – Reporting Violations below) receiving the protected disclosure will notify the disclosing individual (if her or his identity is known) and acknowledge receipt of the reported violation or suspected violation within ten working days for most issues and within 24 hours for alleged criminal or environmental violations. All reports will be investigated within 45 calendar days and appropriate corrective action will be taken if warranted by the investigation.

## IV. Reporting Violations

- A. Individuals should share their questions, concerns, suggestions, or complaints with a Company administrator who can address them properly. In many cases the individual's supervisor is in the best position to address an area of concern. If an individual is not comfortable speaking with the supervisor, or is not satisfied with the supervisor's response, that individual should take his or her concerns to the office listed below that will investigate and/or address the concern as appropriate.

Contact: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

- B. Supervisors who receive protected disclosures are required to contact the appropriate office listed in Procedure Section IV – Reporting Violations.
- C. An alternative method to report concerns specific to the following areas is to contact the Company's Anonymous Reporting Line via telephone at \_\_\_\_\_ or via Internet at \_\_\_\_\_.

## V. Individual Responsibilities

- A. Be knowledgeable about this policy.
- B. Report violations or suspected violations of the policy to the individual's direct supervisor or to the appropriate office as noted above.

## VI. Unit Responsibilities

- A. Familiarize employees with this policy and incorporate it into its orientation materials.
- B. Schedule training for leaders, supervisors and managers. Provide training or information on an ongoing basis for employees.

## VII. Office of Human Resources Responsibilities

- A. Accept and investigate protected disclosures regarding employment matters.
- B. Accept and investigate complaints of retaliation for making protected disclosures.
- C. Provide training for managers and units about this policy.
- D. Provide information about this policy during New Employee Orientation and Human Resource Professional training.
- E. Maintain records on disclosure investigations and actions taken under this policy.

**For forms:** Whistleblower Report Form (next page)

**For more information:** Company Anonymous Reporting Line \_\_\_\_\_

## WHISTLEBLOWER REPORT FORM

Person reporting the actual or suspected wrongful conduct: (do not complete this section if you wish this to be an anonymous report)

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Department: \_\_\_\_\_

Campus mail address: \_\_\_\_\_

Campus phone: \_\_\_\_\_ E-mail address: \_\_\_\_\_

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Person against whom the report of actual or suspected wrongful conduct is being made:

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Department: \_\_\_\_\_

Campus mail address: \_\_\_\_\_

Campus phone: \_\_\_\_\_ E-mail address: \_\_\_\_\_

Use the space below and/or the back of this form or additional sheets to describe the alleged wrongful conduct. Include specific facts and any documentation you have, as well as the names of any individual with whom you have discussed your concerns.