

## Whistleblower Policy

The Whistleblower submission form is intended to encourage employees and others to make good faith reports of suspected fraud, wrong-doing, corruption, or other improper or unethical activity that may adversely impact the Organization, employees, students, customers, board members, or the public at large. The form can also be used for health and safety concerns or to report a blatant disregard to the high standards of customer service.

The Whistleblower Policy addresses the Organization's continuing commitment to ethical behavior and helps foster an environment where management, board directors, officers and employees of the Organization can act without fear of retaliation by establishing procedures for the reporting of wrongdoing or suspected wrongdoing. This process is also intended to reassure employees that they will be protected from harassment, discrimination, retaliation or victimization for whistleblowing in good faith. Employees are encouraged to discuss with supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation. We want to assure you that your responses are completely anonymous. Responses cannot be traced back to the submitting individual. No personally identifiable information is captured unless you voluntarily offer personal or contact information in any of the comment fields.

### **Reporting Responsibility**

It is the responsibility of all employees to comply with the Code of Conduct and to report violations or suspected violations in accordance with this Whistleblower Policy.

### **No Retaliation**

No supervisor or employee who in good faith reports a violation of Organizational policies or Code of Conduct, shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. The Whistleblower Policy is intended to encourage and enable employees to raise concerns within the Organization prior to seeking an alternate resolution.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to every extent possible, consistent with the need to conduct an adequate investigation.

### **False Allegations**

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.

### **Reporting Violations**

The Employee Manual addresses the Organization's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with their supervisor or an employee is not satisfied with their supervisor's response, the employee is encouraged to speak to someone in the Human Resources Department or anyone in management. Supervisors and managers are required to report suspected policy violations to appropriate administration, who has the specific and exclusive responsibility to investigate all reported violations.

### **Whistleblower Procedure**

To make a report, go to <http://www.collegesooner.com/whistleblower-form> Please contact the Human Resources Department with any questions.