

WHISTLEBLOWER AND RETALIATION POLICY

The Foundation requires board members, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The Foundation's directors, employees, and representatives will practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

I. Reporting Responsibility

This policy is intended to encourage and enable employees and others to raise serious concerns internally so the Foundation can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of the Foundation's policies or suspected violations of law or regulations that govern the Foundation's operations.

II. Retaliation Prohibited

The Foundation prohibits any board member, officer, or employee from retaliate against anyone who in good faith reports a violation, or a suspected violation, of any policy or law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any policy governing the operations of the Foundation. 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. Any board member or officer who retaliates against someone who has reported a violation in good faith is subject to removal from the board or office.

III. Reporting Procedure

Employees should share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the chair of the board or the College's Human Resource Officer. Board members and supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the Human Resource Officer who has the responsibility to investigate all reported complaints.

IV. Accounting and Auditing Matters

The Foundation's executive director or any director shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

V. Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to

have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

VI. Confidentiality

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

VII. Handling of Reported Violations

The Student Resource Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Approved September 14, 2005

Amended/no-change: February 8, 2023