



OFFICIAL POLICY

Whistleblower Policy

1.0 PURPOSE

Wheeling University is committed to high standards of ethical, moral and legal business conduct. In accordance with this commitment, and the University's commitment to open communication, this policy provides an avenue for employees to report concerns related to either a known or suspected violation of policy or law without fear of retaliation.

2.0 POLICY

2.1 Definitions:

- 2.1.1 "Whistleblower" - an employee of the University who reports in good faith conduct or activities that the employee reasonably considers to violate federal, state law or local law and/or University policies.

2.2 Procedure

- 2.2.1 The University encourages complaints, reports or inquiries about any potential violation of the Code of Business Conduct, any other University policy and/or any applicable law. This includes, but is not limited to, financial improprieties, accounting or audit matters, ethical violations or other similar types of illegal or improper activities. This policy, however, is not intended to provide a means of appeal from outcomes in other University policies.
- 2.2.2 Good faith reporting responsibility – Every University employee has an obligation to report in accordance with this policy any potential violation of the Code of Business Conduct, any other University policy and/or any applicable law. Anyone reporting a concern must act in good faith and have reasonable grounds for believing that the information disclosed indicates a potential violation of the Code of Business Conduct, other University policy and/or any applicable law. If allegations raised pursuant to this policy are determined to be unsubstantiated **and** are found to have been made maliciously, recklessly or with the knowledge or belief that the allegations are false, the reporting employee will be subject to disciplinary action, up to and including discharge from employment.
- 2.2.3 If possible, an employee should first discuss a concern with the employee's immediate supervisor. If, after speaking with the employee's immediate supervisor, the employee continues to have reasonable grounds to believe the concern is valid, the employee should report the concern to the University's designated Compliance Officer (UCO). For the purpose of this policy, the Vice President of Human Resources and Compliance shall service as the UCO. If the employee is uncomfortable speaking with the immediate supervisor, or if the supervisor is the subject of the concern, the employee should report the concern directly to the UCO. If the employee is uncomfortable speaking with the UCO the employee should report the concern directly to the Board via the Chair, Finance Committee.

- 2.2.4 The University Compliance Officer may be contacted as follows:

Mr. David Hacker
Suite 307
316 Washington Ave.
Wheeling, WV 26003
dhacker@wju.edu
304.243.2639



- 2.2.5 Anonymous concerns may be made directly to the Chair, Finance Committee via University's Hotline, which is monitored by the Finance Committee of the Board of Trustees. The hotline number is 877-716-5402. Concerns reported through the hotline will be forwarded to the, Chair, Finance Committee. Any concern reported verbally to the UCO shall be reduced to writing by the reporting employee, with the assistance of UCO. The UCO is required to promptly report the concern to the Board. T
- 2.2.6 The UCO shall investigate all reported concerns. The UCO will acknowledge receipt of the reported concern to the reporting employee within five business days, if possible. It is not possible to acknowledge receipt of anonymously submitted concerns.
- 2.2.7 If the UCO is unavailable for any reason, or if the concern relates to the UCO, employees may report concerns directly to the Chair of the Finance Committee of the Board of Trustees. At that time the Chair of the Finance Committee will assign an investigator.
- 2.2.8 All reported concerns pursuant to this policy will be investigated promptly by the UCO, and the UCO will recommend appropriate action (including disciplinary action) to be taken to the President or the Finance Committee of the Board of Trustees, if warranted by the investigation findings. When possible, the UCO should advise the employee who reported the concern of how the concern was addressed. The UCO shall have the authority, with Board approval, to retain outside counsel, accountants, private investigators or utilize other resources deemed necessary to conduct a full and complete investigation of the allegations.
- 2.2.9 Confidentiality – Reports of concerns, and the investigations of those concerns, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious offense, and may result in disciplinary action, up to and including discharge from employment.
- 2.2.10 No retaliation – This policy is intended to encourage employees to raise concerns within the University for investigation and appropriate action. To that end, no employee who reports a concern in good faith shall be subject to retaliation, including adverse employment consequences. Any employee or volunteer who retaliates against someone who has made a good faith report pursuant to this policy will be subject to disciplinary action, up to and including discharge from employment, or dismissal from a volunteer position.

3.0 AUTHORIZATION

The Vice President, Human Resources and Compliance has the authority to change, modify or approve exceptions to this policy at any time with notice and with the approval of the Board of Trustees.