

Wilberforce University

WHISTLEBLOWER POLICY

1. Purpose.

Wilberforce University requires board members, committee members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee members and employees to comply with all applicable laws and regulatory requirements.

2. Reporting Responsibility.

Wilberforce University seeks to have an “Open Door Policy” and encourages board members and employees to share their questions, concerns, suggestions, or complaints regarding the University and its operations with someone who can address them properly. In most cases, a board member or committee member should present his or her concerns to the Chair of the Board. The VP of Administrative and Financial Affairs is generally in the best position to address an employee’s area of concern. However, if a board member is not comfortable speaking with the Board Chair or is not comfortable with the Board Chair’s response, or if an employee is not comfortable speaking with the VP of Administrative and Financial Affairs or if the employee is not satisfied with the VP of Administrative and Financial Affairs’ response, the board member, committee member or employee is encouraged to speak with anyone on the Board whom the employee is comfortable in approaching, or to directly contact Wilberforce University’s outside legal counsel, whose contact information can be obtained from the VP of Administrative and Financial Affairs.

3. No Retaliation.

No board member, committee member, or employee who in good faith reports a violation of a law or regulation requirement 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. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within Wilberforce University prior to seeking resolution outside the University].

4. Compliance Officer.

Wilberforce University’s VP of Administrative and Financial Affairs, working with the Human Resource Director, will act as Wilberforce University’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving all employee complaints and allegations concerning violations of the Principles and/or Code. The Board Chair or his or her designee will take on the Compliance Officer role if the complaint involves the VP of Administrative and Financial Affairs. If the complaint involves both the VP of Administrative and

Financial Affairs and Board Chair, outside legal counsel [Or another board member] will carry out the functions of the Compliance Officer.

5. Accounting and Auditing Matters.

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.

6. Requirement of Good Faith.

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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.

7. 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 the extent possible, consistent with the need to conduct an adequate investigation.

8. Handling of Reported Violations.

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

A dedicated phone line has been established at (937)708-5796 for Whistleblower issues. This number will be made available to the University members via the Wilberforce University Website as well as postings and email alerts. The phone line will go directly to voicemail and will allow reports to maintain anonymous if the caller makes that choice. The password for the voicemail is maintained by the VP of Administrative and Financial Affairs and the HR Director. This mailbox will be checked at least once a month and logged and initialed. This list is maintained by the HR Director