



<b>Policy Owner</b>	Office of Human Resources
<b>Applicability</b>	All Employees
<b>Revision Date</b>	January 1, 2023

## Whistleblower Protection Policy

### Policy Statement

Salve Regina University expects its employees to perform their duties in accordance with applicable laws and regulations, University policy and procedures, and high ethical standards. The University is committed to compliance with the laws and regulations to which it is subject. Its internal controls and operating procedures are intended to detect and prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities.

This policy is intended to encourage and enable employees and others to raise serious concerns related to violations and suspected violations of law or University policy of a financial nature or misuse of university resources, so that the University can address and correct any inappropriate conduct and/or actions. It is not intended and may not be used for personal or employment grievances, general compensation or benefits complaints or opinions or questions on policy.

### Policy

A whistleblower as defined by this policy is an employee of Salve Regina University who reports an activity that they consider to be illegal or dishonest. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

An employee who has a question about the appropriateness of any practice under University policies or procedures should ordinarily seek guidance from their supervisor or a University official with compliance oversight for the particular policy or procedure. An employee may also seek guidance from the Office of Human Resources or from the Office of the Assistant VP for Finance.

If there are suspected violations of law or University policy of a financial nature or misuse of University resources, employees may feel it is necessary to report a concern outside of the traditional reporting procedures. Such violations may include, but are not limited to, theft or inappropriate use of cash or other University property, fraudulent activity, such as falsification of hours worked for payroll purposes, inappropriate spending of cash through the accounts payable process or inappropriate expenditures of University funds outside of accounts payable.

Individuals wishing to report violations or suspected violations may visit, call, or send a letter or email to the following:

- the Office of the Assistant VP for Finance and Controller
- the Office of the Associate VP and Chief Human Resources
- the Office of the Chief of Staff
- the Office of the President

If an employee believes the violation or suspected violation involves the President or a trustee of the University, or any report concerning accounting practices, finances, internal controls, inappropriately managed conflicts of interest and/or auditing may be submitted in writing, marked confidential, to the Chair of the Audit Committee of Salve Regina University's Board of Trustees, at 100 Ochre Point Avenue, Newport, RI, 02840.

### **Acting in Good Faith**

Anyone reporting a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed contains 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.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis. Whenever possible, the anonymity of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and/or to provide the accused individuals of their legal rights of defense.

### **No Retaliation**

No individual, who in good faith reports a violation or suspected violation, shall suffer retaliation or harassment, including adverse employment consequences. An employee who retaliates against someone who has reported a violation or suspected violation in good faith is subject to discipline up to and including termination of employment.

Any whistleblower who feels they are being retaliated against should contact the Associate VP and Chief Human Resources Officer. Whistleblower protection rights do not include immunity for any personal wrongdoing that is alleged and investigated.