

Salve Regina University Whistleblower Policy

This Policy is intended to address issues related to the reporting and investigation of suspected violations of law, external regulations or University policy of a financial nature or misuse of University resources and is not intended and may not be used for personal or employment grievances, general compensation or benefits complaints or opinions or questions on policy.

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.

An employee who has a question about the propriety of any practice under University policies or procedures should ordinarily seek guidance from his or her 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 the Office of the Associate VP for Finance.

There are times when an employee may feel it is necessary to report a concern of financial wrongdoing outside of the traditional reporting procedures. The University provides various mechanisms to assist and encourage employees to come forward in good faith with reports or concerns about suspected compliance issues.

This policy covers only the reporting and investigation of suspected violations of law, external regulations or University policy of a financial nature or misuse of University resources. Such violations may include, but are not limited to, theft or inappropriate use of cash or other University property, falsification of hours worked for payroll purposes and 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 do so by sending a notice in any of the following ways:

- A visit, call, letter or email to the University's Office of the Associate VP for Finance
- A visit, call, letter or email to the University's Office of the Associate VP for Human Resources
- A visit, call, letter or email to the University's 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.

No individual who in good faith reports a violation or suspected violation shall suffer harassment, retaliation or adverse employment consequence. Anonymity of the reporter will be maintained to the extent practicable within the limitations of the law, SRU policy and needs of the investigation. Any employee who intentionally files a false report will be subject to disciplinary action.