

TRINITY INTERNATIONAL UNIVERSITY

TIU POLICY: Whistleblower Policy
TIU POLICY #: P-54
STATUS: Approved, October 2008
Updated, June 2017

I. PURPOSE:

To specify policy for providing an avenue for Trinity International University (University) employees, including part-time and temporary employees, to raise concerns that could have an adverse impact on the University, while being reassured that they will be protected from reprisals for whistleblowing in good faith.

II. SCOPE:

This policy applies to all employees and extends to the following areas of concern:

- A. Incorrect financial reporting
- B. Unlawful activities
- C. Actions that are not in line with University policies, such as the Code of Ethics Policy
- D. Serious improper conduct

III. POLICY:

A. Description

Trinity International University seeks to be good stewards of the resources that enable us to pursue our mission. We are committed to the highest possible standards of ethical and legal conduct. The University's internal controls and operating procedures have been established to detect and to prevent or deter improper activities. However, even the best controls cannot provide absolute safeguards against irregularities. The Whistleblower policy is intended to provide an avenue for employees to raise concerns regarding those irregularities.

It is the responsibility of all employees to use guidance provided by this policy for reporting all violations or suspected violations.

B. Reporting Violations

An employee raising a concern is commonly referred to as a whistleblower. The whistleblower's role is as a reporting party; they are not investigators, nor do they determine the appropriate corrective or remedial action that may be warranted. The identity of a whistleblower will be known to the Compliance Officer and anonymity will be

safeguarded to the extent possible. However, in the event of litigation the possibility exists that the whistleblower may be asked to testify.

Reporting of allegations is encouraged to be provided in writing to establish a clear understanding of the issue(s) being raised. Though the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that there are sufficient grounds for concern. These reports should be factual rather than speculative, and should contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the investigative procedures. 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.

In most cases, concerns should be addressed first to the employee's supervisor. However, if the employee is not comfortable speaking with the supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with Human Resources. If the employee is uncomfortable speaking with either of these two individuals for any reason, Trinity has designated a Whistleblower Compliance Officer. Concerns should be sent to whistleblower@tiu.edu or a report can be mailed to:

Senior Vice President for Finance and Operations
Attn. Whistleblower Compliance Officer
Trinity International University
2065 Half Day Road
Deerfield, IL 60015

C. Response to Violation Report

The policy of Trinity International University is to handle allegations of violations seriously and expeditiously. Subsequent communication will occur when a determination is made on the appropriate course of action and depending on the nature of the issue. Further information may be sought from the whistleblower. All allegations will be reported to the Audit Committee of the Board of Regents.

No employee who in good faith reports a violation of a policy shall suffer harassment or retaliation. Any employee who believes that he or she is being retaliated against should contact Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing or poor work performance that is alleged and investigated.

When possible, the confidentiality of the whistleblower will be maintained. However, identity may need to be disclosed to conduct a thorough investigation and/or to comply with the law and to provide accused individuals a legal right of defense.

D. Retention of Records

All records relating to an investigation through the policy outlined above shall be retained for a period of no less than two years from the date of the allegation unless otherwise subject to a specified retention period. After this time, the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry or investigation.