

Whistleblower Policy

General

The Fort Lewis College Foundation (FLCF) requires directors, key volunteers, and staff who support the whistleblower Policy are to establish policies and procedures for the following:

- The submission of concerns regarding potential violations of laws, regulations, policies or questionable accounting matters by staff, directors, officers, volunteers, and other stakeholders of the FLCF, on a confidential and anonymous basis
- The receipt, retention, and treatment of complaints received by the FLCF regarding such concerns
- The protection of directors, volunteers, and staff reporting concerns from retaliatory actions

Confidentiality

Reports of concerns, and investigation pertaining thereto, 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 disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment.

Authority of Audit Committee

All reported concerns shall be forwarded to the FLCF Audit Committee in accordance with the procedures set forth herein. The Audit Committee shall be responsible for investigating and making appropriate recommendations to the FLCF Board of Directors, with respect to all reported concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and staff to raise concerns within the FLCF for investigation and appropriate action. With this goal in mind, no director, volunteer, or staff, who in good faith, reports a concern shall be subject to retaliation or, in the case of staff, adverse employment consequences. Moreover, a volunteer or staff who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Reporting Concerns

The FLCF encourages complaints, reports, or inquiries about potential illegal practices, including illegal or improper conduct by the FLCF itself, by its leadership, or by others acting on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which FLCF or FLC has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment through FLC's human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

Staff should first discuss their concern with their immediate supervisor. If, after speaking with his or her supervisor, -0.7 a)7(s)7o)-ui.8v4C8)-4.3 iat)-3 (e)-3 (s)-1.7 a)3.7D Td(h)-0.7(u)(e)-3 4.9 (e)-6n)-OP #IC1.2070.7(e)-h(ak)-2.6in)2

