

Whistleblower Policy

OVERVIEW

Keck Graduate Institute is committed to the highest standards of financial and professional conduct, as outlined in its Code of Conduct. This policy is designed to enable all of the Institute's faculty and staff to report concerns about possible financial misconduct and violations of the KGI Code of Conduct, with reassurance that they will be protected from retaliation for acting in good faith. Reports on financial misconduct would address such issues as accounting discrepancies, fraud, accounting misrepresentations, auditing matters, accounting omissions, and misappropriation of grant funds. Reports on behavioral misconduct would address such issues as discrimination, harassment of any type, conflicts of interest, workplace hazards and breaches of confidentiality.

POLICY

All reports of suspected violations of the KGI Code of Conduct by Keck Graduate Institute employees should be made confidentially or non-confidentially via the My Safe Campus website or dedicated phone line. Depending upon its subject matter, the report will be directed to the Chair of the Audit Committee of the Board of Trustees, the Chair of the Board of Trustees, or senior administrators who will oversee the receipt, retention and resolution of such reports. The Administration, working with outside advisors when appropriate, will be responsible for ensuring that these reports receive the appropriate attention. Any employee ultimately found to have engaged in financial misconduct or to have violated the KGI Code of Conduct is subject to disciplinary action by the Institute, which may include dismissal as well as prosecution by appropriate law enforcement authorities.

The protection of employees who submit reports on financial misconduct or Code of Conduct violations is an important part of this policy, as is maintenance of the confidentiality, objectivity and independence necessary to resolve complaints appropriately. The Chair of the Board of Trustees, the Chair of the Audit Committee and the Administration share responsibility for maintaining these features of the policy, although, depending on the nature of the discipline or the actions of law enforcement agencies, this confidentiality cannot be guaranteed.

It is a violation of this policy to knowingly make fraudulent allegations of financial misconduct or other Code of Conduct violations with the intent to cause harm to another individual. Those making such allegations are also subject to disciplinary action, up to and including termination.

PROCEDURE

Since confidentiality is an important part of this policy, the Institute has contracted with an outside reporting service called MySafeCampus to facilitate the transmission of reports of

financial misconduct and/or code of conduct violations to senior authority at KGI. . Reports may be made by accessing the website (www.MySafeCampus.com) or by calling the toll-free number (1-800-716-9007). Both methods are available 24 hours a day, seven days a week. Upon submission, the reporting party is provided with a confidential access number and is asked to generate a personal password that provides access to the status of the report. The reporting party may also send and receive anonymous messages pertaining to his/her report. Responding to any follow-up questions posted on the message board will expedite an efficient investigation.

When a reporting party makes a report, he or she will be asked to choose among three levels of anonymity: anonymous to both the Institute and MySafeCampus; anonymous to the Institute but not to MySafeCampus; or known to both parties. The report should contain as much detailed information about the incident(s) as possible in order to facilitate an efficient and thorough investigation. This detail should include, at a minimum, the names of the parties involved, the location of the incident(s) and the nature of the possible financial misconduct or Code of Conduct violation. Once a report is made, it is important for the reporting party to check the status of the report periodically, because if the respondent requires additional information, a message will be posted on the MySafeCampus message board for follow-up by the reporting party. If the additional information is not provided, the investigation may be deemed inconclusive and, therefore, result in no action.

Any questions regarding this policy should be directed to the Vice President for Administration.

Employee's Name (Print)

Employee's Signature

Date