

**INVESTIGATION OF CONCERNS RELATIVE TO BUSINESS
PRACTICES (Whistleblower)
HUMAN RESOURCES AND ORGANIZATIONAL DEVELOPMENT
PROCEDURE No. 211**

POLICY STATEMENT

The College's internal controls and business policies and procedures are intended to prevent or detect improper activities with respect to the College's financial statement disclosures, accounting or business practices, finances, internal controls or auditing matters, and/or suspected violations of Champlain's Code of Business Conduct. Nonetheless, the College welcomes information concerning potentially undetected improper activities of this sort. The College, therefore, encourages employees, students, alumni, parents and others to report in good faith, their concerns about suspected improper activity as described in this policy. No individual who, in good faith, reports a matter covered by this policy shall suffer harassment, retaliation, or adverse employment, academic or education consequence as a result.

SECTION I PURPOSE OF THE POLICY

The purpose of this policy is to establish procedures for submitting complaints or concerns regarding financial statement disclosures, accounting or business practices, finances, internal controls or auditing matters, or suspected violations of Champlain's Code of Business Conduct. For other issues see the Associate Vice President, Human Resources for advice on the mechanism for reporting.

SECTION II ELIGIBILITY PROVISION

This policy applies to all employees and students of Champlain College.

SECTION III DEFINITIONS

Whistleblower: A person who reports potential wrongdoing with respect to the College's financial statement disclosures, accounting or business practices, finance, internal controls or auditing matters, or potential violations of the College's Code of Business Conduct, to the College's administration and/or Board.



SECTION IV PROCEDURE

4.1 Individuals wishing to report violations or suspected violations may send or submit a sealed envelope to the Chair of the Audit Committee, Champlain College Board of Trustees, c/o President's Office, PO Box 670, Burlington, VT 05402-0670. If an individual wishes to discuss any matter with the Audit Committee, he or she should so indicate in the submission and include a telephone number where they can be reached. Should the Committee deem such communication appropriate, the individual will be contacted accordingly.

4.2 Following the receipt of a complaint submitted under this policy, the Audit Committee will:

4.2.1 Acknowledge receipt of the complaint to the sender (unless anonymously submitted);

4.2.2 Investigate or direct an investigation to commence on each matter reported, and take corrective or disciplinary actions, if appropriate. In conducting an investigation, the Audit Committee or its representative, will use reasonable efforts to protect the confidentiality and anonymity of the complainant. Confidentiality may have to yield to the needs of the investigation and/or the accused's need to participate in a discussion of the situation, but the College prohibits retaliation in any event.

4.2.3 The Audit Committee may engage legal counsel or other outside professionals to conduct the investigation and provide a report to the Chair of the Audit Committee.

4.3 At the conclusion of any action(s) taken by the Audit Committee under this policy, the Chair of the Audit Committee will:

4.3.1 Provide a summary report of the investigation, conclusion, and resolution regarding the suspected violations to the Champlain College Board of Trustees. A verbal or written summary may also be provided to the individual filing the complaint, as determined by the Chair of the Audit Committee.

4.3.2 Provide a copy of the file to the Secretary of the Board of Trustees for the purpose of documenting and maintaining the resolution of the matter.

4.4 Individuals found to be making baseless allegations without regard for their truth or falsity may be subject to institutional disciplinary action.

SECTION V POLICY ADHERENCE

The Senior Vice President for Finance and Administration is the responsible official for this policy. Any exceptions to this policy must be approved by the Senior Vice President for Finance and Administration.



SECTION VI CONTACT

Questions related to the interpretation of this policy should be directed to the Vice President, People and Technology.

Any individual with questions about whether or not the policy applies to a given incident should use the process described above. The Audit Committee will determine whether or not the incident should be investigated under this policy, or should be addressed instead to the Vice President, People and Technology.

The above is a summary only. Always refer to the applicable plan documents, policies or guides before making final decisions. People Center policies and procedures are updated on an as-needed basis. As such, the College reserves the right to alter, amend or suspend the terms of this policy at its sole discretion; please refer to the policies posted on the People Center intranet site for the most current version. This policy does not constitute an employment contract.

