

## **INTERIM WHISTLEBLOWER PROTECTION POLICY**

Lafayette College (the “College”) requires that all its Trustees, officers, members of committees, employees and volunteers observe high standards of business and personal ethics in carrying out their duties and responsibilities. As representatives and employees of the College, we must practice honesty and integrity in fulfilling our responsibilities and at all times strive to comply with the laws and regulations that are applicable to the College’s operations as a charitable and educational organization. In that regard, all Trustees, officers, members of a committee, volunteers and employees of the College are encouraged to report their concerns about incidents, practices or suspected incidents or practices that they believe may be unlawful or unethical or otherwise not in compliance with the College’s charitable and educational mission, its bylaws or its operational policies and procedures.

The purpose of this Whistleblower Protection Policy is to establish procedures to ensure that the College’s Trustees, officers, members of committees, employees and volunteers can report good faith suspicions of illegal, unethical or other inappropriate conduct without fear of retaliation. Individuals who believe in good faith that such conduct may have occurred should follow the procedures below when making a report:

1. If the whistleblower is a member of the Board of Trustees, the whistleblower should report it to the Chairman of the Board.
2. If the whistleblower is an officer of the College, the whistleblower should report his or her concerns to the President of the College. If the matter involves the President, the whistleblower should report his or her concerns to the Chairman of the Board.
3. If the whistleblower is an employee of the College, or a volunteer of the College, the whistleblower should report his or her concerns to the College’s Vice President for Human Resources. If the matter involves the Vice President for Human Resources, the whistleblower should report his or her concerns to the President.
4. Individuals wishing to make an anonymous report under this policy may do so by using the College’s hotline (800-539-6085).

The outcome of all investigations conducted pursuant to complaints filed under paragraphs 1 – 4 above shall be reported to the Audit Committee of the Board of Trustees. When appropriate, the outcome of the investigation will be reported to the whistleblower by the recipient of the complaint.

The College will treat all communications under this Whistleblower Protection Policy in a confidential manner, except to the extent necessary (1) to conduct a complete and fair investigation, or (2) for review of the College’s operations by an appropriate fact finder, the Chairman of the Board of Trustees and/or the President, and/or the auditors, and/or the College’s legal counsel.

The College will not permit any negative or adverse actions to be taken against any Trustee, officer, member of a committee, employee or volunteer who in good faith reports a possible violation of law, unethical conduct or conduct that is not otherwise in compliance with the College’s charitable and educational mission, its bylaws or its operational policies and procedures, including any

concerns regarding questionable accounting or auditing matters, even if such a report is mistaken. Similarly, the College will not permit any negative or adverse actions to be taken against any Trustee, officer, member of a committee, employee or volunteer who assists in the investigation of a reported violation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately to the appropriate person or persons as provided in this Whistleblower Protection Policy or as otherwise might be appropriate under the circumstances.