

WHISTLEBLOWER PROTECTION POLICY

Lafayette College (the “College”) is committed to the highest standards of ethical conduct for all members of the campus community (which includes, but is not limited to, students, employees, Trustees, etc.). Employees are expected to adhere to the highest standards of professional, personal and ethical conduct in carrying out their duties and responsibilities. As an employee 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. Maintaining ethical standards, including appropriate financial and data standards, human resources practices, compliance with legal and regulatory requirements, and sound risk management is the responsibility of every member of the Lafayette community. Early identification and resolution of ethical issues that might arise are critical to maintaining sound business.

The purpose of the Whistleblower Policy is to establish procedures to ensure that the campus community can report, in good faith, any concerns about suspected ethical and compliance issues.

Reporting: All members of the campus community are encouraged to come forward in a timely manner and in good faith, believed or suspected violations of College policy, violations of law, dishonesty, fraud, or other misconduct. Employees are encouraged to submit such reports to their immediate supervisor or the appropriate department chairperson, Associate Vice President for Human Resources or the Senior Advisor to the Executive Vice President for Finance and Administration.

Anonymous Reporting: Although the College encourages employees to report concerns within the College itself, there may be times when an employee may feel it is necessary to report a concern of wrongdoing outside of the traditional reporting structure. To address this situation, Lafayette has selected an independent firm to provide a way to anonymously and confidentially report activities that may involve improper conduct or violations of Lafayette policies and practices. You may file a report by visiting:

www.ethicspoint.com

OR

An anonymous link is available through:

1. www.lafayette.edu,
 - a. Students, Faculty, & Staff
 - i. Anonymous Tip Hotline

OR

by telephone at 1- 800-539-6085

WHISTLEBLOWER PROTECTION POLICY

Investigation/Results: Following the receipt of a report, the Associate Vice President for Human Resources and/or the Senior Advisor to the Executive Vice President for Finance and Administration will promptly conduct an investigation and take the appropriate action. In the event that the report is financial in nature, the report should be submitted to the Associate Vice President for Human Resources and the Chair of the Audit Committee of the Board of Trustees for investigation and not through the Senior Advisor to the Executive Vice President for Finance and Administration. Similarly, a report involving the Office of Human Resources should be submitted directly to the Senior Advisor to the Executive Vice President for Finance and Administration for investigation. All reports will be investigated promptly and discreetly, receiving careful consideration with the objective of addressing any improper conduct or violation of college policy. Confidential replies will be posted to the website for the reporting person's access.

Confidentiality: The College will treat all communications under this Whistleblower Protection Policy in a confidential manner, subject to applicable laws and regulations, and 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 Associate Vice President for Human Resources and/or the Senior Advisor to the Executive Vice President for Finance and Administration

Protection: The College will not permit any negative or adverse actions to be taken against anyone who in good faith reports a possible violation of College policy, violations of law, dishonesty, fraud, or other misconduct. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately to the Associate Director of Human Resources and/or the Senior Advisor to the Executive Vice President for Finance and Administration. Any retaliation will be subject to disciplinary action, up to and including termination of employment.

However, the College emphasizes the importance of providing truthful and accurate information when making a report. Any individual found to have made a false or malicious report may be subject to disciplinary action up to and including termination of employment.

Lafayette College encourages all individuals to use this Whistleblower Policy responsibly and in good faith to maintain the integrity and reputation of the College community.