



HARCUM COLLEGE

Ethics Policy

I. Introduction

Harcum College is committed to maintaining an environment of respect and trust consistent with the College's mission statement. In addition, the College is committed to complying with all laws and regulations applicable to it. The College relies upon its employees to perform their duties in accordance with the law, regulations, and the College's policies and procedures. While the College's internal controls, policies, and procedures are intended to prevent and detect wrongdoing and waste, the College encourages good faith reports by College employees and others of observed or suspected wrongdoing, waste, or noncompliance with law, regulations, or College policies.

This Ethics Policy is designed to encourage and enable College employees and others who have good faith, reasonable concerns about wrongdoing or waste, including violations of law, regulatory violations, or violations of College policies and procedures, to report their concerns.

This policy is not intended to supplant existing College policies. Thus, complaints or grievances such as those regarding discrimination or harassment, personnel, employment, and labor relations matters, academic matters, and other matters for which the College has specific policies, should continue to be made and addressed in accordance with the policies and procedures applicable to such matters and applicable law.

II. Reporting Misconduct

Any person may report allegations of wrongdoing or waste. Reports should focus on facts and avoid speculation. Reports shall include as much detailed information as possible in order to better facilitate evaluation of the nature, extent, and urgency of the wrongdoing or waste.

Employees may report allegations of wrongdoing or waste to their manager or other appropriate supervisors in their work area. Employees may also make reports internally to the Director of Human Resources. The College recommends that persons who are not employees of the College make reports to the College official whom the reporting person reasonably believes has responsibility over the affected area or holds one of the positions listed above. Anonymous reporting is also permissible but such reports must include sufficient detailed information to enable an investigation.

In addition to the methods of report set forth above, any person (identified or anonymous) may make a report of suspected wrongdoing or waste to the College's independent hotline provider at:

- 1-855-795-3610 or
- www.harcumcollege.ethicspoint.com

A person making a report under this policy may request that it be handled as confidentially as possible. Although the College will endeavor to handle all such reports in a confidential matter, other obligations and considerations may preclude the College from maintaining confidentiality in all circumstances.

III. Protection from Retaliation

No individual who in good faith reports suspected wrongdoing or waste shall suffer discrimination or retaliation for making such a report. Individuals who believe that they have suffered discrimination or retaliation may report it by one of the reporting methods identified above.