

Whistleblower Policy

- A.** Gonzaga University has a responsibility for the stewardship of university resources and the public and private support that enables it to pursue its Mission. Gonzaga University is committed to compliance with the laws and regulations to which it is subject and to promulgating university policies and procedures to interpret and apply these laws and regulations in Gonzaga University setting. Laws, regulations, policies, and procedures strengthen and promote ethical practices and ethical treatment of all members of the Gonzaga community, those who conduct business with Gonzaga, and those who conduct Gonzaga's business.
- B.** Gonzaga's internal controls and operating procedures are intended to detect and prevent or deter improper use of university assets, misappropriations, or improper commercial business transactions or activities. However, even the best systems of control cannot provide absolute safeguards against such irregularities. Intentional and unintentional violations of laws, regulations, policies, and procedures may occur and may constitute improper use of university assets, misappropriations, or improper commercial business transactions or activities. Gonzaga has a responsibility to investigate and report to appropriate parties allegations of any such suspected improper activities. Examples of improper activities are set forth in Exhibit A.
- C.** Anyone may report an allegation of improper use of university assets, misappropriations, or improper commercial business transactions or activities. A whistleblower report may be made to EthicsPoint, Gonzaga's independent and confidential reporting service, or other internal Gonzaga reporting sources. EthicsPoint can be reached at: www.gonzaga.ethicspoint.com or 1-855-888-9237. EthicsPoint shall review the report and coordinate with appropriate individuals at Gonzaga to investigate and determine the facts. In all instances, Gonzaga retains the prerogative to determine when circumstances warrant an investigation and, in conformity with this policy and applicable laws and regulations, the appropriate investigative process and/or disciplinary process to be employed.
- D.** A person or entity reporting improper use of university assets, misappropriations, or improper commercial business transactions or activities is commonly referred to as a whistleblower. Whistleblowers may be university employees (faculty or staff), applicants for employment, students, vendors, contractors, or the general public. The whistleblower's role is as a reporting party. Whistleblowers are not investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.
- E.** Whistleblowers frequently make their reports in confidence. To the extent possible, within the limitations of law and policy and the need to conduct a competent investigation, confidentiality of whistleblowers will be maintained. Whistleblowers should be cautioned that their identity may become known for reasons outside of the control of the investigators or university administrators. Should the whistleblower self-disclose his or her identity, Gonzaga will no longer be obligated to maintain such confidence.
- F.** Similarly, the identity of the subject(s) of the investigation will be maintained in confidence with the same limitations.

- G.** It is a violation of Gonzaga policy to threaten, intimidate or retaliate in any way against an individual for raising allegations of harassment or discrimination, participating in an investigation, complaint process or hearing, filing a complaint alleging harassment or discrimination, or encouraging others to report. Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment. Gonzaga will take immediate and responsive action to any retaliation. Anyone found to have acted in a retaliatory manner may be subject to appropriate disciplinary action up to and including termination of employment.
- H.** This whistleblower policy does not address work-related conflicts and thus does not replace or supplant the **Part 2: Grievance Policy** found in the *Gonzaga University Policies and Procedures Manual* and in the *Gonzaga University Faculty Handbook*, Section 307.00, et seq., under the circumstances described herein.

Exhibit A

Examples of Improper Conduct and Reprisal or Retaliation

Examples of improper conduct include, but are not limited to the following:

1. Forgery or alteration of documents
2. Unauthorized alteration or manipulation of computer files
3. Fraudulent financial reporting
4. Pursuit of a benefit or advantage in violation of Gonzaga's conflict of interest policy.
5. Misappropriation or misuse of university resources, such as funds, supplies, or other assets
6. Authorizing or receiving compensation for goods not received or services not performed
7. Authorizing or receiving compensation for hours not worked
8. Knowingly allowing others to do a dishonest act