

HAVERFORD COLLEGE

General Whistleblower / EthicsPoint Reporting Policy

I. Introduction

This Policy governs the reporting of allegations of unethical behavior, illegal activity, financial or other misconduct and the protection against retaliation afforded to those who make such reports.

In order to encourage the reporting of suspected unethical behavior, illegal activity, and financial or other misconduct, Haverford College will be providing members of the community the option of anonymous and confidential reporting to EthicsPoint.

Haverford employees and community members already have the option of reporting misconduct internally to the specific individuals identified in many other Haverford policies and procedures. In addition to these reporting options, the College has now chosen to also offer reporting through EthicsPoint, which can be done on an anonymous confidential basis, in order to further encourage the reporting of misconduct.

II. Reporting Using EthicsPoint

Examples of misconduct that Haverford employees and other members of the Haverford community can report to EthicsPoint include, but are not limited to:

- *Academic misconduct*, including cheating / plagiarism, alcohol abuse, hazing, sexual harassment, and other safety issues.
- *Accounting and financial misconduct*, including fraud, theft, embezzlement, waste or abuse of resources, submission of false and fraudulent documents, bribes or kickbacks, and falsification of contracts, reports or records. (Accounting and financial misconduct may also be reported internally as described below in Section 3 on Reporting/Investigation of Alleged Financial Misconduct.)
- *Human resources misconduct*, including conflicts of interest, discrimination or harassment, benefits abuses, offensive communication, threats, and unsafe working conditions.
- *Information technology misconduct*, including malicious or inappropriate use of technology, data privacy issues, misuse of resources, and software piracy.
- *Medical misconduct*, including intrusion into protected health information, insurance issues, or research misconduct.
- *Research misconduct*, including conflicts of interest, data privacy issues, safety issues, fraud, human or animal research, intellectual property issues, and scientific misconduct.

1. How to Report Using EthicsPoint

Reports of misconduct may be made to EthicsPoint by phone or online. Phone reports should be made by calling: 855-811-6222. Online reports may be made by referring to EthicsPoint's website, available at www.haverford.ethicspoint.com More information about EthicsPoint is available in the FAQs at EthicsPoint, available at www.haverford.ethicspoint.com

2. Anonymity and Confidentiality with EthicsPoint

While EthicsPoint offers fully anonymous and confidential reporting, individuals making reports to EthicsPoint must choose to remain anonymous by not providing identifying information. Individuals making reports to EthicsPoint may also choose to identify themselves to EthicsPoint.

Upon receiving a report, EthicsPoint will send the report to the appropriate person within the College to handle it, based on the type of violation and location of the incident identified in that report. While the College will endeavor to maintain appropriate confidentiality of reporting sources and work diligently to assure privacy regarding the matter or circumstance being reported, the College cannot and does not guarantee confidentiality for individuals who provide identifying information to EthicsPoint.

III. Reporting/Investigation of Alleged Financial Misconduct

In addition to reporting via EthicsPoint, reports of alleged financial misconduct such as fraud, waste, theft, or abuse of funds may be made by utilizing the below internal procedures. These reporting procedures apply *only* to matters related to potential financial misconduct. All other allegations or grievances regarding employment, harassment, criminal conduct, and other matters are handled through other policies and procedures already established at the College, including EthicsPoint as described above.

1. Who To Contact to Report Financial Misconduct

If you encounter or become aware of any suspected financial misconduct at the College, you are encouraged to report it.

If you are a student, your first report should be to the Dean of the College. If your report is about the Dean of the College, or if you for some reason are unable to contact the Dean, you may provide a written report in a sealed envelope, addressed as follows: Dana Shanler Ladden, Chair, Haverford Audit Committee, MetLife, 1095 Avenue of the Americas, 18th Floor, New York, New York, 10036.

If you are not a student, your first report should be to the Director of Human Resources. If your report is about the Director of Human Resources, or if you for some reason are unable to contact the Director, you may provide a written report in a sealed envelope, addressed as follows: Dana Shanler Ladden, Chair, Haverford Audit Committee, MetLife, 1095 Avenue of the Americas, 18th Floor, New York, New York, 10036.

If the *initial* reporting party is the Dean of the College or the Director of Human Resources, s/he must provide his/her report directly to the Chair of the Audit Committee. This only applies to reports where the Dean of the College or the Director of Human Resources is the original source of the complaint, not where they are receiving information from others.

If for whatever reason the initial report comes to you about suspected financial misconduct, you should direct the reporting party to the Dean of the College or the Director of Human Resources, as appropriate and consistent with the procedures set forth here.

2. How to Make Contact to Report Financial Misconduct

You may contact the Dean of the College or the Director of Human Resources via letter, telephone, a personal visit during normal office hours, or electronic mail. Current contact information for those individuals is available on the Haverford College website. As of September 2015, here is that contact information:

If to the Dean of the College:

Dean Martha Denney

Dean of the College

610-896-1232

mdenney@haverford.edu

Chase Hall, 2nd Floor 370 Lancaster Ave., Haverford, PA 19041

If to the Director of Human Resources:

T. Muriel Brisbon

Director of Human Resources

610-896-1250

tbrisbon@haverford.edu

Stokes Hall, Room 118 370 Lancaster Ave., Haverford, PA 19041

IV. Confidentiality and Anonymity

The College will endeavor to maintain appropriate confidentiality of reporting sources—whether those sources report internally or through EthicsPoint. However, for all reporting sources who choose to identify themselves, the College cannot and does not guarantee confidentiality. Identification of the reporting source (also known as a “whistleblower”) to the appropriate

persons is often necessary to enable the College or law enforcement officials to effectively investigate the report. Moreover, sometimes such identification is required by law. Finally, it is sometimes appropriate to identify the whistleblower so the accused individual can assess and respond to the report against him/her.

V. Whistleblower Protection / Non- Retaliation

No member of the Haverford College community may retaliate against a whistleblower, and no whistleblower may be disciplined for providing a report in good faith. Prohibited retaliatory conduct includes, but is not limited to, threats or actions that adversely affect the terms or conditions of employment or enrollment, threats of physical harm, or threats of pecuniary harm.

Any whistleblower who feels threatened or feels that s/he has been retaliated against should provide a written complaint, explaining the circumstances, to the Director of Human Resources. Threats of physical harm should also be reported promptly to the Director of Safety and Security. If for some reason reporting to the Director of Safety and Security and/or the Director of Human Resources is not feasible or appropriate, the written complaint should be provided to the College's Vice President for Finance and Chief Administrative Officer, Treasurer. All charges of retaliation will be investigated.

VI. False Reporting Prohibited

This Policy is intended to: (1) encourage legitimate reports of possible wrongdoing by responsible College community members; and (2) protect those who provide such reports from retaliation. By contrast, any person who knowingly makes a false report will be subject to disciplinary action, which may include action by authorities both on and off-campus.

VII. Investigation of Alleged Misconduct

If an investigation appears warranted based upon the information received from the reporting source, the College will thereafter conduct an investigation. Neither the whistleblower nor the target of the complaint will conduct nor have any right to direct the investigation.