

**Carleton College**  
**Whistleblower Policy**  
**Approved by the Audit Committee: May 16, 2007**

**Objectives and Purpose**

The objectives of this policy are to:

- Formally establish procedures to help provide a workplace conducive to open discussion of the business practices of the College; and
- To positively reinforce and influence compliance with federal and state laws.

Employees and representatives of Carleton College are expected to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. The purpose of this policy is to comply with all applicable laws that protect employees of the College against unlawful discrimination or retaliation by their employer as a result of their lawfully reporting information regarding, or their participating in, investigations involving fraud or other violation by the College or its agents of federal or state law.

**No Retaliation**

No director, officer or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the College prior to seeking resolution outside the College.

**Reporting Violations**

In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in the Human Resources Department or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations to the Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with the process above, individuals should contact the Compliance Officer directly.

**Compliance Officer**

The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at their discretion, shall advise the President and/or the Audit Committee of the Board of Trustees. The Compliance Officer has direct access to the Audit Committee and is required to report to the audit committee at least annually on compliance activity. The Compliance Officer is appointed by the Audit Committee.

**Accounting and Auditing Matters**

The Audit Committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of federal or state law. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **Confidentiality**

Violations or suspected violation may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.