

RIPON COLLEGE

Fraudulent or Dishonest Conduct Policy (Whistleblower Policy)

Ripon College is committed to maintaining the highest standards of conduct and ethics. This Fraudulent or Dishonest Conduct Policy (the “Policy”, “Fraud Policy”, or “Whistleblower Policy”) reflects the practices and principles of behavior that support this commitment. The College expects every employee, volunteer, and trustee to read and understand the Policy and its application to the performance of his or her responsibilities.

The College will investigate any possible fraudulent or dishonest use or misuse of College resources or property by faculty, staff, administrators, or volunteers. The College will take appropriate action against anyone found to have engaged in fraudulent or dishonest conduct, including disciplinary action by the College, or civil or criminal prosecution when warranted.

All members of the College community are encouraged to report possible fraudulent or dishonest conduct (i.e., to act as a “whistleblower”), pursuant to the procedures set forth in the next section.

How to Report

- Concerns about possible fraudulent or dishonest use or misuse of resources should be made in writing and forwarded in a sealed envelope to the Vice President for Finance, the President, the Chair of the Audit Committee or the Chair of the Board of Trustees. Sufficient information should be provided in order that an investigation can be conducted. The envelope should be marked as “Confidential – Fraud Policy”. These concerns may be submitted on a confidential, anonymous basis, if the person so desires. The names of the current persons in these positions and their contact information are attached to this Policy.
- A Toll Free Hotline **1-888-344-1957** may be used to report concerns about possible fraudulent or dishonest use or misuse of resources. Sufficient information should be provided in order that an investigation can be conducted. The employee is encouraged to include a telephone number so that he or she may be contacted if more information is required.

The College encourages those submitting concerns to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. An investigation of unspecified wrongdoing or broad allegations will not be undertaken without verifiable evidentiary support. Because investigators are unable to interview anonymous whistleblowers, it may be more difficult to evaluate the credibility of the allegations and therefore, less likely to cause an investigation to be initiated.

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Confidentiality

Whistleblowing complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Generally this means that whistleblower complaints will only be shared with those who have a need to know so that the College can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.)

Malicious Allegations

Malicious allegations may result in disciplinary action.

Whistleblower Protection

Employees of the College may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Vice President for Finance. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Contacts

Questions related to the interpretation of this policy should be directed to the Vice President for Finance. See the attached document for the current names and addresses of the Vice President for Finance, President, Chair of the Audit Committee, and Chair of the Board of Trustees.

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CONTACT INFORMATION

Interim Vice President for FinanceLori Schulze
Ripon College
Ripon, Wisconsin 54971
Voice: (920) 748-8108
E-mail: schulzel@ripon.edu

Interim President.....Andrea Young
Ripon College
Ripon, Wisconsin 54971
Voice: (920) 748-8118
E-mail: younga@ripon.edu

Chair of the Audit Committee.....George Zornada
K&L Gates
One Lincoln Street
Boston, MA 02111
Voice: (617) 261-3231
E-mail: george.zornada@klgates.com

Chair of the Board of Trustees.....Thomas Abendroth
Schiff Hardin LLP
233 S. Wacker Drive Suite 7100
Chicago, IL 60606
Voice: (312) 258-5501
E-mail: TAbendroth@schiffhardin.com

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