

Whistleblower Policy

The whistleblower policy is intended to provide a mechanism for the reporting of illegal, unacceptable or fraudulent activity or the misuse of Mount St. Joseph University assets while protecting the individuals who make such reports from retaliation.

Questionable Conduct

This policy is designed to address situations in which an employee suspects another employee to have engaged in illegal acts or questionable conduct involving the Mount Saint Joseph University's assets. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any manager or to the Mount's auditors, or even an employee's conflict of interest that results in financial harm to the Mount. The Mount Saint Joseph University encourages employees to report such questionable conduct and has established a system that allows them to do so anonymously.

Making a Report

If an employee suspects illegal conduct or conduct involving misuse of the Mount's assets or in violation of the law, he or she may report it and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Employees can make a report to any of the following Mount administrators at any time: president, chief financial officer, or chief compliance & risk officer. The Mount will promptly conduct an investigation into matters reported, keeping the informant's identity as confidential as possible consistent with its obligation to conduct a full and fair investigation.

Alternatively, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

No Retaliation

An employee who has made a report of suspicious conduct and who subsequently believes he or she has been subjected to retaliation of any kind by any Mount employee is directed to immediately report it to the president, the chief financial officer, or the chief compliance & risk officer as appropriate.

Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practical, consistent with a full and fair investigation. The party conducting the investigation will notify the employee of the results of the investigation.

Mount Saint Joseph University strongly disapproves of and will not tolerate any form of retaliation against employees who report concerns in good faith regarding the Mount's operations. Any employee who engages in such retaliation will be subject to discipline up to and including termination.

Employee Handbook

Reporting Procedures

The following “whistleblower” procedure is intended to describe the process through which concerns about the possible misuse of Mount St. Joseph University assets are handled pursuant to its whistleblower policy.

1. An employee makes a report of suspected misuse of Mount assets by reporting in person to the president, chief financial officer, or the chief compliance & risk officer, or if reporting anonymously, by submitting a written statement to one of the above administrators. The report is promptly reviewed by the president, as well as the chief financial officer, to determine whether the report constitutes a complaint or a non-complaint, unless one of them is allegedly involved in the misconduct, in which case the report should be reviewed by only one of them. (If both of them are alleged to be involved, the report should go directly to the Board of Trustees audit/finance committee chair.)
 - A *complaint* means any report involving (i) questionable accounting, auditing, financial reporting, or internal controls; (ii) suspected fraud, theft, or improper use of Mount assets; (iii) a violation of the Mount’s conflict-of-interest policy that results in financial harm to the Mount; or (iv) a claim of retaliation against any employee making a good-faith report regarding any of the preceding matters.
 - A *non-complaint* means a report of any other matter not involving a misuse of Mount assets.
2. If the report is deemed to be a complaint, it will be promptly investigated and a written report of the outcome of the investigation will be prepared and delivered to the chair of the audit/finance committee. If the report is deemed to be a non-complaint, it will be referred to the appropriate line officer for follow-up. Some non-complaints may involve serious matters and may require prompt investigation, but may nevertheless not involve misuse of Mount assets.
3. Each complaint is fully investigated, and as far as possible handled so as to protect the privacy of the employee making the complaint.
4. The audit/finance committee chair decides whether the report involves a matter that is material. If it is deemed material, it is reviewed by the full committee, which may forward it for disposition to the Board of Trustees or may direct line officers to take actions to resolve the situation. If the report is deemed nonmaterial, it is not reviewed by the committee but is instead addressed by the chief financial officer, as appropriate.