

OWENS COMMUNITY COLLEGE FOUNDATION

WHISTLEBLOWER POLICY

MAY 13, 2009

1. **General Policy.** Owens Community College Foundation (the “Foundation”) requires its directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As such, the Foundation adopts the following policy for its directors, officers and employees to report in confidence any possible fraudulent, dishonest or unethical conduct.
2. **Reporting.** All directors, officers and employees are required to report any information that leads them to suspect any violation of Foundation policy or applicable laws and any situations where proposed conduct may constitute such a violation (collectively, a “Compliance Incident”). Failure to report a Compliance Incident is itself a violation of Foundation policy and will subject a director, officer or employee to disciplinary action.
3. **Report Procedures.** A report may be made by (1) explaining the suspected violation in person to the Foundation’s Chairman, Vice Chairman, Secretary or Treasurer; or (2) mailing any written concern to the Foundation’s Chairman, Vice Chairman, Secretary or Treasurer. Any report made by mailing should be addressed to the Foundation’s Chairman, Vice Chairman, Secretary or Treasurer, marked confidential and sent to the following address:

Owens Community College Foundation
P.O. Box 10,000
Toledo, Ohio 43669.
4. **Identity of Reporter.** Persons making a report shall not be required to provide their identity as part of their report. The Foundation through its officers or their designees will thoroughly investigate both identified and anonymous reports.
5. **Confidentiality.** The Foundation will endeavor to maintain the identity of the reporting individual in strict confidence. The person’s identity may be disclosed if (1) the person agrees to be identified, (2) identification is necessary to allow the Foundation or law enforcement officials to investigate or respond effectively to the report, (3) identification is required by law, or (4) the person accused of the violation is entitled to the information as a matter of legal right in disciplinary proceedings. However, depending on the nature of the issue, the identity of the reporting individual may become obvious to others.
6. **Response to Reporting.** The reporting individual shall receive an oral response within five (5) days of receipt of the report. Depending upon the nature of the issue, the response may be that the questioned practice is proper, that the questioned practice is improper and has been corrected, or that the questioned practice is being currently investigated. If the questioned practice is still under investigation, or has not yet been resolved, the reporting

individual shall be informed of the expected time needed to resolve the issue. At the end of this time period the reporting individual shall be informed of the issue's resolution, or if the issue is not yet resolved, of its progress. This procedure shall continue until the reporting individual is informed of the issue's final resolution.

7. **Handling Compliance Reports.** All reports will be investigated promptly and appropriate action taken if warranted by the investigation. Responding to a report can involve complex legal or policy questions that are appropriately handled at the Board level, typically with guidance from counsel. If the result of the investigation indicates that corrective action is required, the Foundation will determine and implement those steps to be taken. Unless permitted pursuant to this policy, directors, officers and employees should not attempt to investigate or otherwise take remedial action to respond to a Compliance Incident on their own, whether with respect to their own or someone else's conduct. Such "self-help" efforts by directors, officers and employees may adversely affect the Foundation's ability to investigate or otherwise address the matter and take the best responsive action.
8. **Cooperation.** Directors, officers and employees are expected to cooperate in any investigation or other effort by the Foundation to respond and report. The Foundation will not tolerate any direct or indirect efforts by a director, officer or employee to cover up a violation of law, regulations, or Foundation policy or otherwise impede an investigation or corrective action, such as withholding information, fabricating an inaccurate or misleading version of the facts, creating misleading documents, alternating or destroying records or other such deceptive conduct. Any such conduct is itself a violation of Foundation policy.
9. **No Reprisals.** No director, officer or employee who in good faith makes a report will be subject to disciplinary action or otherwise penalized for making such a report. Any director, officer or employee involved in reprisals or other action against an individual who in good faith reports a violation of law or Foundation policy will be subject to disciplinary action. However, submission of a report that is known (or should reasonably be known) to be false or misleading at the time made constitutes a violation of Foundation policy and will subject the director, officer or employee to disciplinary action.