

Saint Anselm College Financial Whistleblower Policy

Saint Anselm College has a responsibility for the stewardship of College resources and the private support that enables it to pursue its mission. The College is committed to compliance with the laws and regulations to which it is subject.

The College's internal controls and operating procedures are intended to detect and to prevent or deter improper activities involving accounting practices, finances, internal controls or auditing. However, even the best systems of control cannot provide absolute safeguards against irregularities in these areas. Intentional and unintentional violations of laws, regulations, policies and procedures may occur. The College has a responsibility to investigate and report to the appropriate parties allegations of suspected improper activities in relation to financial matters and to report the actions taken by the College.

The College shall address all reported concerns regarding College accounting practices, finances, internal controls or auditing. Relevant concerns may include but are not limited to accounting, misrepresentations, accounting omissions, financial irregularity, fraud, theft, corruption, bribery, kickbacks, and the misappropriation of college funds.

Procedures

It is the responsibility of all Trustees to report any improprieties that potentially impact the integrity and effective operation of the College. Individuals may report violations or suspected violations of this policy to the Chair of the Audit Committee of the Board of Trustees or the Chair's designee. The Chair of the Audit Committee will advise the Chair of the Board and the College's President of receipt of a report of suspected improper activities, as appropriate. If the report implicates the Chair of the Audit Committee then the issue may be reported to the Chair of the Board of Trustees.

The Audit Committee shall address all reported concerns. The Committee may enlist senior management of the College, and/or outside legal, accounting or other advisors, as needed, to conduct an investigation. The Committee will document the investigation, including a summary of findings and submit recommendations for any action deemed appropriate to the College's President and the Chair of the Board of Trustees.

Whistleblower reports shall be handled with discretion and confidentiality to the extent allowed by circumstances and the law.

Any person who is the subject of an investigation shall be notified of its existence and will be permitted to respond to the allegations unless such notification would interfere with the investigation, recovery of college assets or possible criminal prosecution.

Whistleblower Protection

No individual who in good faith reports a violation or suspected violation of this policy shall suffer harassment or retaliation. Retaliation against an individual who has reported a suspected violation in good faith will result in disciplinary action.

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. 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.