

# Grinnell College Financial Whistleblower Policy

## PURPOSE

Grinnell 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. Intentional and unintentional violations of laws, regulations, policies and procedures may occur. The College has a responsibility to investigate and report to appropriate parties allegations of suspected improper activities in relation to financial matters and to report the actions taken by the College.

## POLICY

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.

The policy is intended to address financial issues and is not intended to address employment grievances, personal disputes, opinions on policy, human resource issues, discrimination/harassment issues, safety/environmental/health matters

It is the responsibility of college community members to report violations or suspected violations in accordance with this Financial Whistleblower policy.

## PROCEDURES

Individuals wishing to report violations or suspected violations may do so by:

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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.

When a report is received, the office of the President or Human Resources will work with the Chair of the Audit & Assessment Committee of the Board of Trustees, management and outside legal counsel as considered necessary to determine the appropriate actions to be taken based on an investigation into the merits of the report. The investigation team will document the investigation which will include a summary of findings.

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