



POLICIES AND PROCEDURES

EMPLOYMENT SERVICES

Subject: Whistleblower
Last Revision Date: August 8, 2022

Policy No.: ES_600
Date: March 31, 2022
Revision: 3

A. Statement

B. Procedure

A. STATEMENT

Employees have a responsibility for the stewardship of corporate resources that enables us to pursue our mission of supporting Cal Poly Pomona. The Foundation is committed to compliance with all laws and regulations to which it is subject and to circulating applicable policies and procedures to stakeholders within the organization. Laws, regulations, policies and procedures strengthen and promote ethical practices and treatment of the members of our community and those who conduct business with the Foundation.

Foundation employees are prohibited from engaging in any improper business activities or activities that create significant threats to the health and/or safety of the organization and/or campus community in the performance of their work duties. Foundation employees and applicants for Foundation employment should be free to report waste, fraud, negligence, abuse of authority, violation of law or threat to public health at the Foundation without fear of retribution.

B. PROCEDURE

Reporting Responsibility. It is the responsibility of all Board directors, employees, independent contractors and volunteers to report violations or suspected violations in accordance with this policy.

No Retaliation. No individual who in good faith reports a violation under this policy shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Violations. Employees or applicants for employment who believe that they have suffered reprisal, retaliation, threats, coercion or similar acts for having made a protected disclosure may file a written retaliation complaint with their supervisor, manager or directly with the Foundation Human Resources Director/CHRO or Executive Director/CEO. The complaint alleging retaliation must be signed by the complainant and contain a sworn statement that the contents of the written complaint are true or believed by the complainant to be true, under penalty of perjury.

Acting in Good Faith. Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated. 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 have been made maliciously or with knowledge that they were false, will be treated as a serious disciplinary offense.

Confidentiality. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. The company will use its best efforts to protect the confidentiality of the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has occurred or is occurring within approximately three (3) weeks from the time the complaint is received or report made. The Executive Committee shall be informed of all such complaints or reports.