

Roger Williams University and Roger Williams University School of Law

Whistleblower Policy

Purpose:

The purpose of this Whistleblower Policy (the "Policy") is to encourage and enable good faith reports by employees and students of Roger Williams University and Roger Williams University School of Law (collectively referred to as the "University") and others (including trustees/directors of the University and third parties) of observed or suspected misconduct or noncompliance with University policies or applicable laws (such misconduct and noncompliance hereinafter referred to as "Misconduct").

Scope:

This Policy is intended to encourage and enable employees, students, and others who have good-faith concerns about Misconduct to raise them with the University before seeking external resolution. This Policy is not intended to supersede any existing University policies addressing Misconduct, nor does it affect any rights, responsibilities, or procedures set forth in other University policies addressing Misconduct. For example, complaints regarding discrimination or harassment, other personnel and employment matters, academic and disciplinary matters, research misconduct, or other matters with applicable University policies should ordinarily be made according to the University policies and laws relevant to such matters.

Reporting Misconduct:

Each member of the University community shares responsibility for stewardship of University resources and compliance with University policies and applicable laws. Therefore, employees, students, and others are encouraged to report any Misconduct that may result in financial loss or other harm to the University. The employee, student, or other person making a report of Misconduct pursuant to this Policy is hereinafter referred to as the "Reporting Person."

An employee or student who has a question about the propriety of any practice under University policies or applicable laws should seek guidance from his or her supervisor or a University official with compliance oversight responsibility for the particular policy or area. An employee, student, or other person may also seek guidance from the University's Office of General Counsel.

Confidentiality:

The University will endeavor to handle all reports of Misconduct as confidentially as possible under the circumstances. However, other obligations and considerations may preclude the University from

maintaining confidentiality in all circumstances. The University will also use its best efforts to protect the identity of the Reporting Person, but cannot guarantee such nondisclosure if the identification of the Reporting Person is necessary to University or law enforcement officials for the purposes of investigating the Misconduct.

Anonymous Reports:

A Reporting Person may make an anonymous report of Misconduct, but the University's investigation of an anonymous report of Misconduct may be hampered or impracticable if the employee, student, or other person cannot be identified and questioned about the allegations and related facts.

Persons to Whom Reports May Be Made:

Employees should report Misconduct to their immediate supervisor. Students of Roger Williams University should report Misconduct to the Dean of Students of Roger Williams University. Students of Roger Williams University School of Law should report Misconduct to the Dean of Students of Roger Williams University School of Law. Trustees/directors of the University should report Misconduct to the University's General Counsel or the Chair of the Audit Committee of the University's Board of Trustees. Other persons should report Misconduct to the Office of General Counsel.

If the Reporting Person believes that a potential conflict of interest exists with one of the reporting venues identified above, such Reporting Person may make a report of Misconduct to the University's General Counsel or the Senior Vice President for Finance and Administration. In the event the Reporting Person believes that a potential conflict of interest also exists with the University's General Counsel and the Senior Vice President for Finance and Administration, such Reporting Person may make a report of Misconduct to the Chair of the Audit Committee of the University's Board of Trustees. The report to the Chair of the Audit Committee must be made in writing and submitted in a sealed envelope marked "personal & confidential" to the Office of the University's President for forwarding to the Chair.

No Retaliation:

The University prohibits retaliation against a person making a good-faith report of Misconduct. An employee, student, or trustee/director who retaliates against someone who has made a good faith report of Misconduct is subject to disciplinary action, which may include termination of employment, expulsion of student, or removal from the board. Reporting Persons who believe that they have suffered retaliation in violation of this Policy may report such retaliation to the University's Office of General Counsel. In the event the Reporting Person believes that a potential conflict of interest exists with the University's Office of General Counsel, such Reporting Person may make a report of retaliation

to the Chair of the Audit Committee of the University's Board of Trustees using the procedure outlined above.

Baseless Claims:

A baseless claim results when an allegation is made in bad faith, with knowledge of its falsity, or with reckless disregard for its truth or falsity (hereinafter referred to as a "Baseless Claim"). A Reporting Person who makes a Baseless Claim of Misconduct may be subject to disciplinary action by the University, which may include termination of employment, expulsion of student, removal from the board, and/or legal recourse by the University or individuals who are falsely accused. Reporting Persons are expected to read and understand the University's policies in order to avoid Baseless Claims.