

SNU Policy: Ethics Hotline

SNU Policy ID: General Information A-10

Policy Reviewed by: Director of Human Resources

Approval Authority: Vice President for Business and Finance

Approval Date: July 10, 2018

Next Review Date: July 10, 2023

A. Scope:

This policy applies to all Southern Nazarene University students, employees worldwide, including part time, temporary and contract employees.

B. Purpose:

Southern Nazarene University is committed to the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment and Southern Nazarene University's commitment to open communication, this policy aims to provide an avenue for employees and students to raise concerns, and to offer them reassurance that they will be protected from retaliation or victimization for whistleblowing in good faith. However, if an employee or student feels that their anonymity is not required then they should follow our existing [Grievance Procedures](#).

C. Policy:

The [Whistleblowing Policy](#) is intended to cover serious concerns that could have a large impact on Southern Nazarene University, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with University policy; or
- Otherwise amount to serious improper conduct.

Regular business or human resource matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

D. Safeguards:

1. Harassment or Victimization

No individual will be subject to any form of retaliation, discipline, or other adverse action for submitting hotline reports.

2. Confidentiality

Every effort will be made to protect the reporter's identity by our hotline vendor. Please note the information provided in a hotline report may be the basis of an internal and/or external investigation by the University into the issue being reported. It is possible that as a result of the information provided or discovery of information through the investigation process the reporter's identity may become known to the University. Lighthouse will not provide the University with

the identity of the reporter nor will the University reach out to Lighthouse seeking the reporter's identity.

3. Anonymous Allegations

The policy allows employees and students to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

4. Malicious Allegations

Malicious allegations may result in disciplinary action up to and including termination.

E. Reporting Procedure:

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in either of the following ways:

- Website: <https://www.lighthouse-services.com/snu>
- English speaking USA and Canada: (833) 480-0010 (not available from Mexico)
- Spanish speaking USA and Canada: (800) 216-1288
- Spanish speaking from Mexico user must dial 01-800-681-5340)
- French Speaking from Canada: (855)725-0002
- All other countries: (800) 603-2869 (see attached dialing instructions)
- E-mail: reports@lighthouse-services.com (must include company name with report)
- Fax alternative for written documents: (215) 689-3885 (must include company name with report)

Reporters to the hotline will have the ability to remain anonymous if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the investigation because of the information you have provided. Reports are submitted by Lighthouse to Southern Nazarene University or its designee, and may or may not be investigated at the sole discretion of our University.

Employment-related concerns should continue to be reported through your supervisor or the Director of Human Resources. The earlier a concern is expressed, the easier it is for us to take action. Although you are not expected to prove the truth of an allegation, the employee or student submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

F. How The Reports Will Be Handled:

The action taken will depend on the nature of the concern. The Audit Committee Chair of the Board of Trustees receives a copy of each report and follow-up reports on actions taken by the University.

Initial inquiries will be made to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

1. Feedback to Reporter

Whether reported directly to Southern Nazarene University personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern, including:

- * Acknowledging that the concern was received;
- * Giving an estimate of the time that it will take for a final response;
- * Telling them whether initial inquiries have been made;
- * Telling them whether further investigations will follow, and if not, why not.

2. Further Information

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee or student remains accessible for follow-up. Further information may be sought from the reporter. All communications between the reporter and Lighthouse will be confidential.

3. Outcome of an Investigation

At the discretion of the University and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.

Southern Nazarene University reserves the right to modify or amend this policy at any time as it may deem necessary.