

Franklin Pierce University
Whistleblower Policy

General:

Franklin Pierce University's Code of Ethics and Conduct ("Code") requires trustees, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Franklin Pierce University, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

Confidentiality:

Violations or suspected violations may be submitted on a confidential basis by any person with information that the Code or any applicable laws or regulations may have been violated. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and applicable laws.

Reporting Responsibility:

It is the responsibility of all trustees, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

Acting in Good Faith:

Anyone filing a complaint concerning a violation or suspected violation of the Code should have reasonable grounds for believing the information reported constitutes a violation. Any allegations without a basis and/or which prove to have been made, falsely, maliciously or in bad faith may result in serious disciplinary action.

No Retaliation:

No trustee, officer, or employee who in good faith reports a violation will be subjected to harassment, retaliation, or adverse employment consequence for making such a report. Any trustee, officer or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from office. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Franklin Pierce University prior to seeking resolution outside the University.

Reporting Violations:

Franklin Pierce University's open door policy encourages that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's immediate supervisor is in the best position to address an area of concern. However, if the employee is not comfortable speaking with a supervisor or is not satisfied with the supervisor's response, he or she is encouraged to speak with the Director of Human Resources or other member of the University administration.

Supervisors and/or the Director of Human Resources are required to report suspected violations of the Code of Ethics and Conduct to the Franklin Pierce University's Compliance Officer, who has specific and exclusive responsibility to investigate or delegate investigation of all reported violations. For suspected fraud, or when the employee is not satisfied or uncomfortable with following the Franklin Pierce University's open door policy, the Compliance Officer should be contacted directly. The Compliance Officer has direct access to the Executive Committee of the Board of Trustees and is required to report to the Executive Committee on a regular basis on compliance activity. Franklin Pierce University's Compliance Officer is the Chairperson of the Audit Committee, with the Secretary of the Board serving as the alternate Compliance Officer. Reports to the Compliance Officer should be E-mailed to: complianceofficer@franklinpierce.edu.

Accounting and Auditing Matters:

The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the committee until the matter is resolved. The Audit Committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing, and may involve legal counsel when warranted.

Handling of Reported Violations:

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.