

Whistleblower Policy

The following policy and procedures have been adopted by the Board of Trustees' Audit Committee of Wheaton College, relating to the receipt, retention, and treatment of complaints regarding Wheaton's accounting practices and ethics violations, to protect the confidential, anonymous reporting of employee concerns.

Policy and Procedures

It is the policy of Wheaton College to treat complaints about ethics violations and accounting complaints (i.e., accounting, internal accounting controls, fraud, auditing matters, or questionable financial practices) seriously and expeditiously.

If an employee has a concern or suspects there has been a violation of the Wheaton College policies identified in the Ethics Code (see staff handbook, pages 5 to 8), the employee is strongly encouraged to first speak with his or her supervisor or a representative from Human Resources. If the employee is uncomfortable talking to any of these individuals for any reason, Wheaton College has established an ethics hotline at 1-866-325-5320.

The Hotline is available 24 hours a day, 7 days a week. The caller can choose to remain anonymous. If you call the Hotline, a trained specialist, who is employed by an outside firm, will listen to your concerns and take notes to prepare a report that will be forwarded to both the Vice President for Finance and Operations and the Director of Human Resources for immediate review, or, in cases involving auditing, accounting or internal controls issues, to the Chairman of the Audit Committee of the Board of Trustees.

If requested by the employee, Wheaton College will protect the confidentiality and anonymity of the employee to the fullest extent possible, consistent with the need to conduct an adequate review. Vendors, customers, business partners and other parties external to Wheaton College will also be given the opportunity to submit complaints; however, Wheaton College is not obligated to keep complaints from non-employees confidential or to maintain the anonymity of non-employees.

Wheaton College will not retaliate against employees for submitting complaints under these procedures.

Access to Reports and Records and Disclosure of Investigation Results

All reports and records associated with ethics and accounting complaints are considered confidential information and access will be restricted to Officers of the college (or a designated person investigating the complaint), members of the Audit Committee, and (if necessary) outside legal counsel. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

Complaints and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations.

Retention of Records

All documents relating to an ethics or accounting complaint made through the procedures outlined above shall be retained for a period of no less than 2 years from the date of the complaint unless otherwise subject to a specified retention period (i.e., accounting records are retained for 7 years) after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry, or investigation, in which case, the information may not be destroyed and must be retained for the duration of that litigation, inquiry, or investigation and thereafter as necessary.

Source: Finance Office March 2005