Whistleblower Policy

<table>
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<tr>
<th>Section: Operating/Administrative</th>
<th>Policy Number: 1032</th>
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<td>Responsible Office:</td>
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<td>Office of General Counsel</td>
<td>Effective Date: 12/01/06</td>
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<td>Revised: 04/10/08; 08/24/12; 05/14/14; 01/10/15</td>
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Scope
This policy applies to the University Community, including all members of the Board of Trustees, administrators, staff, faculty and volunteers. This policy will be distributed to all current and future Trustees, employees and volunteers.

Policy
All employees share responsibility for ensuring that the University conducts its affairs using honest, ethical and sound fiduciary practices. All Trustees, administrators, staff, faculty and volunteers have a responsibility to report known or suspected misconduct or fraudulent activity.

Persons who become aware of or suspect financial misconduct, fraud, theft, embezzlement, improper accounting, misuse of University resources or assets, or violation of any University policy, should promptly report the matter to a manager, Human Resources or directly to the University’s General Counsel, or they may elect to file an anonymous, confidential report using a third-party reporting system hosted by the hotline provider EthicsPoint.

To use EthicsPoint to make a report, either call the toll-free number (844) 282-3525 or go to the SJU EthicsPoint website and click the “Make a Report” link. EthicsPoint links are available on the SJU website and on the University’s internal portal MySJU. The direct URL for EthicsPoint is: https://secure.ethicspoint.com/domain/media/en/gui/41213/index.html. When a report is received, the person who completes the report will be assigned a unique code called a “report key” to be used to re-enter the system in order to access feedback and questions.

The University’s General Counsel is responsible for investigating reports that it receives, providing timely reports to the Audit Committee of the Board of Trustees, and contacting law enforcement officials if criminal activity is detected. A finding of misconduct will result in disciplinary action against the offending individuals as well as criminal prosecution, if appropriate.

No retaliatory action (including any form of intimidation, harassment, discrimination or adverse employment consequences) will be taken by St. John’s against anyone for reporting or inquiring in good faith about potential violations of University policies.

The intentional filing of a false report, whether orally or in writing is itself considered wrongdoing for which the University has the right to take appropriate action.
Related Information

Members of the University Community, who wish to contact or make a report directly with the University rather than use the third-party reporting system EthicsPoint, may refer to the following department contacts:

- Sexual harassment, discrimination, ADA, equal opportunity and immigration matters – Office of Human Resources.
- Violations of NCAA regulations – Athletics Compliance Officer.
- Issues of conflict of interest – Office of General Counsel.
- Contract violations – Office of General Counsel.
- Safety, environmental or health matters – Office of Environmental Health and Safety.
- Scientific misconduct – refer to the University’s Policy and Administrative Procedures Governing Scientific Misconduct, which is located on the Office of Grants and Sponsored Research webpage, via the Policy/Procedures link.
- Financial Conflict of Interest on Grants, Contracts and Sponsored Projects – refer to the policy on the Office of Grants and Sponsored Research webpage, via the Policy/Procedures link
- Criminal activity – Department of Public Safety.

Questions about whether or to whom to report should be directed to the Office of the General Counsel at 718-990-6421.