Whistleblower Policy

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<tr>
<th>Section: Operating/Administrative</th>
<th>Policy Number: 1032</th>
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<tr>
<td>Responsible Office: 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</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 are aware of or suspect financial misconduct, fraud, theft, embezzlement, improper accounting, misuse of University resources or assets, or violation of any University policy, should report the problem directly to the General Counsel. Any information received by the General Counsel will be handled confidentially. The General Counsel is responsible for investigating such reports, 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.

Persons who do not wish to be identified may make an anonymous report orally or in writing to the General Counsel. The University has established an anonymous toll-free hotline to accept reports of financial misconduct. This number is 1-866-STJ-1810. Callers to the hotline should provide sufficient corroborating evidence to justify the commencement of an investigation. Reports should include all known information and, to the extent possible, contain verifiable evidence of specific wrongdoing. 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
The University’s Financial Conflict of Interest Policy on Grants, Contracts and Sponsored Projects can be found on the Office of Grants and Sponsored Research page of the University website (click on the policies and procedures link).

Reports of suspected or known violations of other University policies should be reported as follows:
- Sexual harassment, discrimination, ADA, equal opportunity and immigration matters to the Office of Human Resources.
- Violations of NCAA regulations to the Athletics Compliance Officer.
• Issues of conflict of interest to the Office of General Counsel.
• Contract violations to the Office of General Counsel.
• Safety, environmental or health matters to the Office of Environmental Health and Safety.
• Scientific misconduct to the senior administrator as defined in the University’s Policy and Administrative Procedures Governing Scientific Misconduct. (This policy can be found on the Office of Grants and Sponsored Research page of the University website. Click on the policies and procedures link.)
• Criminal activity to the 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.