

Whistleblower Policy

Claremont McKenna College

PURPOSE:

Claremont McKenna College is committed to the highest standards of financial conduct. This policy is designed to enable all of the College's faculty and staff to report concerns about possible financial misconduct, with reassurance that they will be protected from retaliation for acting in good faith. Reports on financial misconduct would address such issues as accounting discrepancies, fraud, accounting misrepresentations, auditing matters, accounting omissions, misappropriation of grant funds, kickbacks, theft of college assets or use of such assets for personal benefit, and falsification of time records.

POLICY:

All reports of suspected financial misconduct by Claremont McKenna College employees or trustees shall be made confidentially and directly to the Chair of the Audit Committee of the Board of Trustees through the College's registered in-house counsel, who shall oversee the receipt, retention and resolution of such reports. The Chair of the Audit Committee will work with the registered in-house counsel, the Administration and outside advisors to ensure that these reports receive the appropriate attention. Any employee ultimately found to have engaged in financial misconduct is subject to disciplinary action by the College, which may include dismissal as well as prosecution by appropriate law enforcement authorities.

The protection of employees who submit reports of suspected financial misconduct is an important part of this policy, as is maintenance of the confidentiality, objectivity and independence necessary to resolve complaints appropriately. The Chair of the Audit Committee, the registered in-house counsel and the Administration share responsibility for maintaining these features of the policy, although, depending on the nature of the discipline or the actions of law enforcement agencies, this confidentiality cannot be guaranteed.

It is a violation of this policy to knowingly make fraudulent allegations of financial misconduct with the intent to cause harm to another individual. Those making such allegations are also subject to disciplinary action, up to and including termination.

PROCEDURE:

Since confidentiality is an important part of this policy, the College has contracted with an outside reporting service called MySafeCampus to facilitate the transmission of reports of financial misconduct to the registered in-house counsel and the Chair of the Audit Committee of the Board of Trustees. Reports may be made by accessing the website (www.MySafeCampus.com) or by calling the toll-free number (1-800-716- 9007). Both methods are available 24 hours a day, seven days a week. Upon submission, the reporting party is provided with a confidential access number and is asked to generate a

personal password that provides access to the status of the report. The reporting party may also send and receive anonymous messages pertaining to his/her report. To expedite an efficient investigation, it is recommended that the reporting party respond as soon as possible to any follow-up questions posted on the message board from the registered in-house counsel and/or the Chair of the Audit Committee.

When a reporting party makes a report, he or she will be asked to choose among three levels of anonymity: anonymous to both the College and MySafeCampus; anonymous to the College but not to MySafeCampus; or known to both parties. The report should contain as much detailed information about the incident(s) as possible in order to facilitate an efficient and thorough investigation. This detail should include, at a minimum, the names of the parties involved, the location of the incident(s) and the nature of the possible financial misconduct. Once a report is made, it is important for the reporting party to check the status of the report periodically, because if the respondent requires additional information, a message will be posted on the MySafeCampus message board for follow-up by the reporting party. If the additional information is not provided, the investigation may be deemed inconclusive and, therefore, result in no action.

AUDIT COMMITTEE REPORTS:

The College's registered in-house counsel, working in conjunction with MySafeCampus, shall prepare periodic summaries of complaints received by categories of complaints, including accounting, internal accounting controls, or auditing matters for review by the Audit Committee. As appropriate, reports regarding the status of specific complaints may be reported on a more frequent basis.

The Audit Committee shall evaluate annually the effectiveness of these guidelines and recommend and adopt changes as necessary.

QUESTIONS:

Any questions regarding this policy should be directed to the registered in-house counsel or the Director of Human Resources.