
9. Whistleblower Policy

General

The Concordia University Chicago ("Concordia") *Code of Ethics and Conduct* ("Code") requires Regents, officers, faculty and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

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

No Retaliation

No Regent, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Reporting Violations

The Code addresses the Organization's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in the Human Resources Department or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Human Resources Department, who is responsible to report all such violations to the Organization's Compliance Officer. The Compliance Officer has specific responsibility to ensure that all reported violations are investigated in an independent and thorough manner. For suspected fraud, or when you are not satisfied or uncomfortable with following the Organization's open door policy, individuals should contact the Organization's Compliance Officer directly.

Compliance Officer

The Organization's Compliance Officer has specific responsibility to ensure that all reported complaints and allegations concerning violations of the Code are investigated in an independent manner, and that appropriate resolutions are achieved. At his discretion, he shall advise the President, the Chairman of the Board, and/or the Finance Committee. The Compliance Officer has direct access to the Finance Committee of the Board of Regents and

is required to report to the Finance Committee at least annually on compliance activity. Concordia's Compliance Officer is the Chairman of the Board of Regents. Contact information for Concordia's Compliance Officer will be publicly available and may also be found in the Human Resources Department, the President's Office, or the Chief Financial Officer's Office.

Accounting and Auditing Matters

The Finance Committee of the Board of Regents shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

If reported to the Human Resources Department or a member of management, the Human Resources Department shall be required to notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. If reported directly to the Compliance Officer, the receipt may not be acknowledged for a period of 20 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.