



1. PURPOSE

The Victor Valley College Foundation requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, must practice honesty and integrity in fulfilling our responsibilities, and comply with all applicable laws and regulations. The purpose of this policy is to promote compliance by protecting individuals who report violations or suspected violations in accordance with this policy.

2. POLICY / PROCEDURE

No director, officer or employee who in good faith reports a violation of policies, laws or regulations 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. The 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.

Employees and others are encouraged to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's direct supervisor is the best person to address an area of concern. However, employees may bring concerns to any supervisor or manager in the Foundation. Supervisors and managers are required to report suspected violations to the President of the Foundation Board and the Chairman of the Foundation Audit Committee who serves as the organization's Compliance Officer. Board members should communicate concerns with the President of the Foundation and /or the Chairman of the Audit Committee.

The Chairman of the Audit Committee shall have the specific and exclusive responsibility to investigate and resolve all reported violations. The Chairman of the Audit Committee, at his discretion, may advise the Executive Director and /or the audit committee of any reported violations, and will at least annually report to the audit committee on compliance activity.

The Audit Committee shall address all reported complaints regarding organizational accounting practices, internal controls or auditing. The Chairman of the Audit Committee shall immediately notify the audit committee of any such complaint and work with the committee until such matter is resolved.

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

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.

The Chairman of the Audit Committee will acknowledge to the sender receipt a reported violation or suspected violation. All reports will be promptly investigated and corrective action taken if warranted by the investigation. All involved parties will be notified of the results of the investigation.