

HAMLIN UNIVERSITY BUSINESS CODE OF CONDUCT HOTLINE

Purpose and Applicability

The purposes of this document are to set forth Hamline University's policy on the reporting and disclosure of workplace misconduct and to protect those individuals reporting alleged misconduct or unlawful practices by Hamline University from retaliation in the form of an adverse action.

This policy relates to matters including but not limited to fraudulent accounting or bookkeeping and illegal or unethical business practices.

Statement of Policy

It is the policy of Hamline University that faculty, staff, students, alumni, applicants, and vendor employees shall be free from fear of retaliation to report any allegation of alleged misconduct existing within Hamline University. These include situations that he or she reasonably believes constitute misconduct related to financial practices such as wire fraud, mail fraud, bank fraud, securities fraud, questionable accounting, internal controls, auditing matters, or other illegal or unethical business practices.

A representative of Hamline University shall not take any action in retaliation against an individual who discloses information regarding misconduct under this policy or who, following such disclosure, seeks a remedy provided under this policy or any law or other Hamline policy.

Process for Disclosure

A service has been designed to make it as easy and safe as possible for individuals to report concerns about possible violations of the Hamline University Policy. This service, which is operated by an independent organization, is called the "Business Code of Conduct" hotline and is available around-the-clock, seven days a week. The toll-free number is 1-866-9HELP-US (1-866-943-5787).

A specially trained intake specialist will answer the call and gather the information needed to investigate the complaint. The intake specialist transcribes the conversation, producing a document. The document is then emailed to a designated recipient at Hamline University who is responsible to send it to the appropriate department.

A randomly generated personal case number is assigned to each case and is a key element in the success of this system. The case number is used by the caller to call back to check on the progress being made regarding the concern(s). The case number

also provides an avenue by which Hamline University and the complainant can communicate with each other while the identity of the complainant is never revealed.

Because of the built-in security, it is important that callers try to be as specific as possible in their complaints. Callers are asked to include the business unit and location and as much detail as possible about the issue. The caller may call back in five (5) business days to check whether the independent organization needs any additional information. Alternatively, by leaving a name and telephone number, the caller may request that someone from the independent organization contact them.

Responses and Follow-up to Complaints by Hamline University

The person(s) to whom the message is routed is responsible for making certain that some type of response is provided and, if possible, an investigation will be initiated within four (4) business days. Normally, initial investigations will be completed within two weeks so that Hamline University can prepare a preliminary response, a copy of which will be emailed to the independent organization on a timely basis. If the initial investigation takes longer than two weeks, a status report will be provided along with an estimate of when the investigation can be completed.

Hamline University's response to the call report will be read to the complainant by the intake specialist from the independent organization. At that point the complainant can provide additional information or indicate a level of satisfaction. Those remarks will then be emailed to Hamline in the same way as the original report.

Complaints of Retaliation as a Result of Disclosure

- A. If an individual believes that he or she has been retaliated against in the form of an adverse action for disclosing information regarding misconduct under this policy, he or she may file a written complaint requesting an appropriate remedy.
- B. For purposes of this policy, an adverse action shall be defined as: discharge, demotion, suspension, threats, harassment, any manner of discrimination with respect to compensation, terms, conditions, or privileges of employment. This policy does not prohibit an action that would have been taken regardless of a disclosure of information.