

Policy Name and Number: 8.2 – Compliance Reporting Program

Policy Section: Employee Rights and Responsibilities

Effective Date: September 26, 2022

Purpose:

Trinity College is committed to adhering to ethical and legal conduct in all of its activities and transactions, and expects all employees to behave in all instances in a manner that is consistent with that commitment. Employees who suspect that ethics violations or accounting irregularities have occurred are encouraged to report their concerns with no fear of reprisal. This policy outlines the procedures for reporting suspected violations of policies, laws or regulations in a confidential manner.

Procedure:

Reporting a violation

An employee who suspects that a violation has occurred which involves unethical behavior or violations of College policy or procedure, especially as they relate to financial matters, is encouraged to first discuss the matter with his or her direct supervisor, with a representative of Human Resources or with the VP for Finance & Operations and Treasurer. If the employee is uncomfortable discussing the matter for any reason, or if the employee's concern relates to the VP for Finance & Operations and Treasurer, he or she may access the confidential compliance hotline or on-line reporting program.

The hotline and online program do not replace other resources available to an employee, but are alternate channels available to employees 24 hours a day, 365 days a year. They are operated on behalf of the College by an independent firm: NAVEX Global. NAVEX Global may be contacted by phone or internet. The compliance hotline number is 866-934-4567. The online program may be accessed at www.trincoll.edu, Trinity A-Z under "Compliance Reporting Program".

Anonymous reporting

An employee need not identify him- or herself by name when reporting concerns. If an employee chooses to provide a name, that information will be kept confidential to the fullest extent possible, consistent with the need to perform a full investigation, unless, as in the case of certain crimes, a law requires that any name supplied be provided to enforcement officials or a court.

No retaliation

This policy is intended to facilitate the reporting by College employees of illegal or unethical behavior. Any form of retribution or retaliation against an employee who reports a compliance issue in good faith is strictly prohibited and will be handled as a disciplinary matter with appropriate action taken for confirmed infractions, up to and including termination of employment.

Good Faith Reporting

It is expected that anyone reporting a concern is acting in good faith. Moreover, a complainant must have reasonable grounds for suspecting that a violation of ethics, policy or law has occurred. An allegation that is proven to be baseless and/or that is determined to have been made maliciously, irresponsibly, or with the knowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment.

Reports and Records and Disclosure of Investigation Results

Any records associated with complaints under this policy are considered confidential and access is therefore restricted to Officers of the College (or a designated person investigating the complaint), members of the Audit Committee, and outside legal counsel, if necessary. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

Records of complaints and any resulting reports or actions will generally not be disclosed to the public except as required by law or regulation.

All documents created as a result of this policy shall be retained for a period of no less than 2 years from the date of the complaint unless otherwise subject to a specified retention period (i.e., accounting records are retained for 7 years) after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry, or investigation, in which case, the information may not be destroyed and must be retained for the duration of that litigation, inquiry, or investigation and thereafter as necessary.