

**SUFFOLK UNIVERSITY
WHISTLEBLOWER POLICY**

Revised 7/8/2010

Policy Statement

Suffolk University is committed to compliance with the laws and the regulations to which the University is subject and expects its employees to perform their duties in accordance with applicable laws and regulations and University policies and procedures.

The University strives to provide an ethical and productive work environment in which employees are encouraged to report issues and concerns about University operations. It is the policy of Suffolk University that all employees be free to report, without fear of retaliation, activity occurring in University operations that the reporting person believes in good faith to be illegal, dishonest, unethical or fraudulent.

Reported allegations will be treated confidentially to the extent possible, and will be promptly investigated. Neither the University nor any of its employees will take adverse employment action or other action in retaliation against a person who reports in good faith information under this Policy.

Protected Reports

This Policy encourages and protects the reporting of observed or suspected activity occurring in University operations which the reporting person believes in good faith to be illegal, dishonest, unethical or fraudulent behavior, including, but not limited to, misconduct related to the University's financial, accounting or audit matters; violations of federal, state or local laws; misappropriation or misuse of University resources, including funds, supplies or other assets; extortion or bribery; forgery or alteration of University documents; fraudulent financial reporting; and authorizing or receiving compensation for goods not received, services not performed or hours not worked (collectively referred to as "Misconduct").

Employees, including student employees, and trustees are encouraged to report Misconduct.

Scope

This Policy is not intended to supplant, but rather to complement and supplement, existing University policies. Therefore, this Policy does not affect any rights, responsibilities or procedures set forth in other University policies addressing misconduct. For example, complaints or grievances such as those regarding discrimination or harassment, other personnel or employment matters, academic matters and other matters to which there are specific University policies, should ordinarily be made and addressed in accordance with the University policies applicable to such matters.

Good Faith

A reporting person who acts in good faith will be protected from retaliation under this Policy. Good faith means that the person has reasonable grounds to believe that the reported allegations are substantially true. A person who makes a false report under this Policy may be subject to disciplinary action, up to and including dismissal from the University. The fact that a report does not result in a finding of Misconduct is not alone sufficient evidence that the report was not made in good faith.

Reporting Process

Since confidentiality is an important element of this Policy, the University has contracted with an independent outside reporting service, EthicsPoint, Inc., to receive and transmit reports under this Policy both to the University's Administrator for the Policy, who is the University's General Counsel, and the Chair of the Audit Committee of the Board of Trustees.

Reports about alleged misconduct can be made by calling the toll-free number for EthicsPoint, Inc. at 855-284-6742 or by accessing its website at www.suffolkwhistleblower.ethicspoint.com. Both reporting methods are available 24 hours a day, seven days a week throughout the year.

The report should contain as much detailed information about the alleged Misconduct as possible in order to conduct an efficient and thorough investigation. In fact, both the telephone and website methods of reporting will present interview questions to the reporter to guide the reporter through the reporting process.

Addressing Reports of Misconduct

Persons reporting Misconduct in University operations should not attempt to investigate the matter independently, as doing so may compromise the integrity of an official investigation by the Office of the General Counsel and could adversely impact the conduct of the investigation, the reporting person and/or the University.

An attorney of the Office of the General Counsel will promptly investigate any report of Misconduct, with the assistance of other University officials as appropriate. All individuals involved in the investigation are required to cooperate with the investigation. The Office of the General Counsel will report the results of the investigation and any recommendations for corrective and/or disciplinary action to the President of Suffolk University, who ultimately shall impose corrective and/or disciplinary action.

If an attorney in the Office of the General Counsel, the President and/or a member of the Board of Trustees is the subject of an allegation of Misconduct, the Chair of the Audit Committee of the Board of Trustees shall receive the report of Misconduct and will appoint individuals to substitute for the role of the Office of the General Counsel and the President in their investigative

and decision-making roles. In these situations, the reporting person shall file the report by delivering it to the Audit Committee of the Board of Trustees, c/o The President's Office.

Confidentiality of Reports and Investigations

A confidential written report will be made to the Chair of the Audit Committee of the Board of Trustees at the conclusion of every investigation.

Reports and investigations will be kept confidential to the extent possible and consistent with University policies and applicable federal, state and local laws. Although the University will endeavor to handle all reports with discretion and due regard for privacy, other obligations and considerations may preclude the University from maintaining confidentiality. For example, the following is a non-exhaustive list of situations in which the University would be required to disclose the identity of the reporting individual: 1) identification is necessary to allow the University or law enforcement officials to investigate or respond effectively to the report; 2) identification is required by law; 3) the University concludes that the person accused of Misconduct is entitled to the information; and 4) pursuant to subpoena and/or court order.

Protection Against Retaliation

The University and its employees are prohibited from engaging in retaliation against any person who in good faith reports a concern under this Policy or who cooperates in the investigation of reported Misconduct. This includes, but is not limited to, retaliation in the form of an adverse employment action, harassing behavior, or threats of harm. Any reporting person who believes that she or he is being retaliated against should contact the Office of the General Counsel immediately so that the University may take timely and appropriate action.

Any employee who engages in retaliation against a reporting person may be subject to disciplinary action up to and including dismissal from the University.

Contact Information

The Office of the General Counsel is located at:

73 Tremont Street
11th Floor
Boston, MA 02108
617-725-4115

Questions

Any questions or concerns regarding this Policy should be directed to the Office of the General Counsel.