

Whistleblower Policy

I. Purpose

The purpose of this Policy is to provide Directors, Officers, employees and other representatives of the Boise State University Foundation with the opportunity to report, in good faith, Wrongful Conduct without fear of retaliation.

II. General

The Foundation expects its Directors, Officers, employees, and other representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Foundation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

III. Reporting Responsibility

It is the responsibility of all Directors, Officers, employees, and representatives to report Wrongful Conduct in accordance with this Whistleblower Policy.

IV. Wrongful Conduct

“Wrongful Conduct” is defined in this Whistleblower Policy to include: a serious violation of Foundation policy; a violation of applicable state and federal law; forgery or unauthorized alteration of documents; or the use of Foundation property, resources, or authority for personal gain or other non organization-related purpose except as provided under Foundation policy

This definition of Wrongful Conduct is not intended to be an exclusive listing of the illegal or improper activity encompassed by the Whistleblower Policy. Rather, the Whistleblower Policy is intended to serve as a means of reporting all serious improprieties that potentially impact the integrity and effective operation of the Foundation.

V. No Retaliation

No Director, Officer, employee, or representative who in good faith reports Wrongful Conduct will suffer harassment, retaliation or adverse employment consequence. Any director, officer, employee, or representative who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to discipline up to and including termination of employment or removal from the Board of Directors, as applicable. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Foundation prior to seeking resolution outside the Foundation.

VI. Reporting Wrongful Conduct

The Foundation encourages its Directors, Officers, employees, and representatives to share their questions, concerns, suggestions, or complaints with someone who can address them properly. Any director, officer, employee, or representative may report Wrongful Conduct to the Executive Director, Chair of the Audit Committee, or the Chair of the Board of Directors. If the Wrongful Conduct implicates one or both of the Executive Director or the Chair of the Board of Directors, or if the reporting individual is not comfortable speaking with or not satisfied with

response of the foregoing individuals, the issue may be reported to any Foundation Director. The Executive Director, Chair of the Board of Directors, and all Directors to whom a report of Wrongful Conduct is made are required to immediately advise the full Board of Directors of such report of Wrongful Conduct.

The complainant may choose to report Wrongful Conduct via mail, email, or through other means of communication. Reports should contain enough information to substantiate the concern and allow an appropriate investigation to begin.

VII. Acting in Good Faith

Anyone filing a complaint of Wrongful Conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates Wrongful Conduct. Any unsubstantiated allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

VIII. Confidentiality

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

IX. Handling of Reported Wrongful Conduct

All reports of Wrongful Conduct or suspected Wrongful Conduct will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Reasonable care will be taken in dealing with suspected misconduct to avoid baseless allegations, premature notice to persons suspected of misconduct, disclosure of suspected misconduct to persons not involved with the investigation, and violations of a person's rights under the law.