

Lawrence University Fraud Reporting Policy

I. Policy

Lawrence University requires its directors, officers, faculty, staff, students, volunteers (collectively, "LU Personnel") to observe high standards of business and personal ethics in the conduct of their duties and responsibilities within the University. RLU Personnel must practice honesty and integrity in fulfilling our responsibilities and must comply with all applicable laws and regulations.

II. Purpose

The purpose of this policy is to foster an ethical and open work environment, ensure the University has a governance and accountability structure that supports its mission, and to encourage, enable and protect LU Personnel, who raise good faith concerns about the occurrence of illegal or unethical actions within the University. This policy is intended to encourage LU Personnel who believe fraud is occurring, to bring it to the University's attention. The University will promptly and thoroughly investigate the matter to determine further action, which may include discipline towards any LU Personnel found to have engaged in unethical or illegal behavior.

III. Scope

This policy applies to all LU Personnel as defined herein.

IV. Terms and Definitions

- **Wrongful Conduct:** Fraudulent activity which violates Lawrence University policy, applicable state or federal law, or use of University property or resources for personal gain, except as permitted under Lawrence University policy.
- **Protected Disclosure:** Communication about actual or suspected wrongful conduct engaged in by LU Personnel on good faith belief and reasonable indications.
- **Retaliation:** Adverse actions, threats, and/or discrimination against a LU Personnel because he or she made a Protected Disclosure or participated in an investigation related to a Protected Disclosure. Adverse actions may include firing, demotion, suspension, harassment, failure to consider the employee for promotion, or any other discrimination.
- **Fraud Reporter:** A LU Personnel who reports Wrongful Conduct within the University according to the Reporting Process described below.

V. Procedures and Guidelines

Reporting Responsibility

The Fraud Reporter is encouraged to promptly make a Protected Disclosure regarding the alleged Wrongful Conduct by a LU Personnel.

All reports of fraud will be taken seriously and therefore handled in a strict, confidential manner. A Fraud Reporter who makes a disclosure that is not done in good faith will be subject to discipline, including termination of their professional relationship with Lawrence University.

Department Name: Human Resources
Department Location: Brokaw Hall
Revised Date: 2.3.2023

Department Phone Number: 920-832-6543
Department Email: humanresources@lawrence.edu
Department Hours: 8:00-12:00 and 1:00-5:00

No Retaliation

Retaliation against the Fraud Reporter for making Protected Disclosures about LU Personnel shall not be tolerated.

Any LU Personnel who undertake Retaliation against a Fraud Reporter who makes a Protected Disclosure will be subject to discipline, including termination their professional relationship with Lawrence University. Allegations of Retaliation shall be reported to the Vice President of Finance and Administration or Provost (together, the "Contact Points").

Reporting Process

1. The Fraud Reporter shall submit a report to the Contact Points. If the Fraud Reporter is uncomfortable or otherwise reluctant to report to the contact points, they are encouraged to report the event to the Chair of the Audit committee.
2. Any allegations of Wrongful Conduct should be disclosed as soon as is practical in a signed written document provided to the Contact Points. If the Fraud Reporter is unwilling or unable to put a disclosure in writing, they should report the activity verbally to the appropriate Contact Point, who will prepare a written summary of the disclosure.
3. The LU Personnel alleged to have committed Wrongful Conduct shall be given an opportunity to respond to the alleged Wrongful Conduct in person or in writing.
4. The Fraud Reporter may be consulted during the investigation but is not entitled to information about the outcome or the disciplinary actions, if any.

VI. Confidentiality and Record

Reports of alleged Wrongful Conduct will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.

VII. Investigation and Follow Up

1. Upon the receipt of the Protected Disclosure, the Contact Points will conduct a thorough investigation regarding the alleged Wrongful Conduct.
2. Upon any conclusive finding of Wrongful Conduct, the Contact Point will determine subsequent actions, which may include involvement of Human Resources, law enforcement and discipline Including the possibility of termination of the professional relationship with Lawrence University.
3. A full report of the findings and actions will be presented to the President and Board of Trustees.

After the investigation and subsequent actions have concluded, an executive summary may be provided to the Fraud Reporter

VIII. Contact Points

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Vice President for Finance and Administration

Samir Datta

Brokaw Hall #117

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Email: Samir.Datta@lawrence.edu

Provost

Peter Blitstein

Sampson House

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Email: Peter.A.Blitstein@lawrence.edu

Audit Committee Chair – Board of Trustees

William Hochkammer

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Office: 313-465-7414

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Email: whochkammer@honigman.com

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