

WHISTLE-BLOWER POLICY

Adler University has an ongoing obligation to members of the University community, to those with whom the University does business or otherwise interacts, and to the public-at-large to maintain the highest ethical standards. The University requires all members of the Adler community to comply with the law and with all University policies.

The University encourages members of the community to come forward in a timely manner with good-faith reports or concerns about suspected compliance issues. Compliance issues are defined as credible information on illegal practices or violations of substantial adopted policies of the organization. Individuals are encouraged to submit such reports to their immediate supervisor or the appropriate Leadership Team member.

Although the University encourages individuals to report concerns to their immediate supervisor or appropriate Leadership Team member, there are times when an individual may feel it is necessary to report a concern of wrongdoing outside of the traditional reporting mechanism. To confidentially report activities that may involve improper conduct or violations of University policies, you may file a report at 1-312-662-4415 (AVP, Human Resources) or at 1-312-662-4401 (Vice President, Finance and IT). Any allegations of wrongdoing on the part of the Vice President of Finance and IT and/or the Associate Vice President, Human Resources are to be reported to the University Counsel at 1-312-662-4304.

Upon submission of a report, the Vice President of Finance and IT and the Associate Vice President of Human Resources will confer, as appropriate, to determine a process for review and investigation which may include the Board of Trustees Finance Committee Chairperson. All reports will be investigated promptly and discreetly, receiving careful consideration with the objective of addressing any improper conduct or violation of law and/or University policy.

All individuals are required to cooperate and provide requested information to University personnel authorized under this policy to investigate and determine the merits of reports of violation and/or complaints of retaliation. Any individual in violation of this policy is subject to action deemed appropriate by the University, which may include discipline up to and including termination from the University.

No retaliatory action will be taken against anyone for reporting or inquiring in good faith about potential violations of the law, University policies, or for seeking guidance with respect to suspected violations. Any such retaliatory action taken shall be considered a violation of this policy and grounds for independent disciplinary action up to and including termination.

An employee shall not intentionally misuse the University's Whistle-Blower Policy. Intentional misuse includes, but is not limited to, frivolous claims, attempts to treat a personal grievance or personnel dispute as an allegation of wrongdoing, lack of good faith in invoking the policy, or any known false, malicious, or misleading statements made at any time under the procedures of this Policy. Any employee who is found to have intentionally misused the Whistle-Blower Policy is subject to disciplinary action up to and including termination.

Grant programs, federal, and state contracts may have specified lines of reporting for issues of misconduct or other violations of applicable policy. Information on specific reporting procedures for the above may be obtained by contacting Human Resources at (1-312-6624415).