

RADFORD UNIVERSITY FOUNDATION, INCORPORATED
Whistleblower Policy
Approved: May 6, 2011

It is the intent of the Radford University Foundation, Incorporated (the “Foundation”) to adhere to all applicable laws and regulations. This policy is designed to encourage directors, officers, employees, and volunteers to come forward with credible information on suspected illegal practices or violations of the Foundation’s policies and to facilitate cooperation in any official inquiry or investigation by any court, agency, or other law enforcement or governmental body. The Foundation will protect any person who has in good faith raised a concern or reported any such violation from retaliation or threats of retaliation. The purpose of this policy is to support the Foundation’s goal of legal compliance and to identify where information regarding suspected violations can be reported.

1. **Reporting unlawful activity.** The Foundation encourages its directors, officers, employees, and volunteers to raise good faith concerns about suspected illegal practices and violations of the Foundation’s policies, including illegal or improper conduct by the Foundation itself, by its leadership, or by others on its behalf, and to provide truthful information in official inquiries or investigations. If any director, officer, employee or volunteer reasonably believes that some policy or practice of the Foundation is in violation of law, a report should be filed with the appropriate person, as described below.

2. **Protection from retaliation.** The Foundation prohibits retaliation by or on behalf of the Foundation against directors, officers, employees, or volunteers for making good faith complaints, reports or inquiries under this policy or for providing information in any official inquiry or investigation. This protection extends to those individuals whose allegations are made in good faith but proven to be mistaken. The Foundation reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries, who engage in retaliation, or who otherwise abuse this policy. Whistleblowers who believe that they have been retaliated against may file a written complaint with the President. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

3. **Where to report.** Complaints, reports or inquiries made under this policy shall be kept confidential and anonymous to the extent possible. Complaints, reports, and inquiries should describe in detail the specific facts demonstrating the basis for the belief that illegal or improper conduct has occurred. Complaints, reports, and inquiries should be directed to the Foundation’s President or the Chairman of the Audit Committee. If both of these persons are implicated in the complaint, report or inquiry, these persons shall recuse themselves from the proceedings, and the Board of Directors shall select an appropriate officer of the Foundation to continue the proceedings.

4. **Procedure.** The appropriate officer will conduct a prompt, discreet, and objective review or investigation and provide a report to the Board of Directors. The Board of Directors shall determine an appropriate response to a complaint, report, or inquiry. Any officer, director, employee, or volunteer who may be implicated in the complaint, report, or inquiry shall not participate in any deliberation of the Board of Directors regarding the complaint, report, or inquiry, except to present information on his or her own behalf. Directors, officers, employees, and volunteers must recognize that the Foundation may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

5. **Distribution of policy.** At the beginning of each fiscal year, the Foundation shall provide a copy of the Foundation's Whistleblower Policy to each director, officer, employee, and volunteer for review.