

Dear College of Wooster Community,

At The College of Wooster, we take seriously our commitment to being responsible and ethical, and each member of our campus community plays a part in that effort. To assist the campus in the ongoing commitment, The College of Wooster has a mechanism in place to report fraudulent activity as well as other important and sensitive issues. That mechanism is referred to as the Ethics Hotline.

The Ethics Hotline is viewed as a reporting tool to assist the college in working together to address fraud, abuse, and misconduct, while helping to cultivate a positive environment. The hotline is managed by the company ComplianceLine, and it provides an easy way to discreetly and confidentially report activities that may involve criminal, unethical, or otherwise inappropriate behavior in violation of college policies.

The system is built to protect the identity of the reporter, as well as provide a formal process for investigation, follow-up and response. It is available for your use around the clock, seven days a week. Again, because the hotline is operated by an independent organization, any calls made through this hotline are completely confidential and anonymous.

You may file a report through the hotline by telephoning toll-free 800-729-1420.

In addition to the Ethics Hot line, the College of Wooster continues its commitment to having an open door policy and encourages you to report concerns to your supervisor, departmental Vice President, or the Associate Vice President for Human Resources. Although not required by law, we have elected to provide the Ethics Hot Line as an additional means of reporting, especially when maintaining the reporter's confidentiality is important. We encourage you to continue resolving issues or disputes through established communication channels whenever possible.

Sincerely,

Marcia Beasley
Associate Vice President for
Human Resources

THE COLLEGE OF

WOOSTER

ETHICS POLICY

INTRODUCTION

The College of Wooster is committed to the highest possible standards of ethical and legal business conduct. In keeping with that commitment, the College desires to provide an avenue for officers, trustees, and employees (including student employees) to raise concerns about the College's conduct with the assurance that they will be protected from reprisals for good faith reports about unethical or illegal conduct on the part of a member of the College community.

POLICY

The College of Wooster officers, trustees, and employees have a responsibility, in the discharge of their college duties, to abide by federal and state laws and regulations as well as College policies. Any officers, trustees, and employees who have knowledge of specific acts which he or she reasonably believes violates the law or College policy should disclose those acts to an appropriate College official. The College has a responsibility to investigate any alleged improper activities and may discipline any individual found to have engaged in such conduct, up to and including termination of employment. The College reserves the right to refer such conduct for civil and criminal prosecution.

REPORTING PROCEDURE

Reports of unethical or illegal conduct may be made to the appropriate Vice President to whom the individual engaging in such improper activity reports. If, for any reason, an individual finds it difficult to report his/her concerns to the relevant Vice President, The College has established an Ethics Hotline ensuring the individual's anonymity. The Ethics Hotline number is 800 749-1820. For additional Ethics Hotline information go to the Human Resources webpage at <http://www.wooster.edu/Offices-Directories/Human-Resources> No individual who makes a report in good faith or participates in an investigation in good faith shall suffer retaliation or reprisals for being involved. The College will take the necessary action to assure that retaliation does not occur. An individual who believes that she/he has been retaliated against may file a written complaint in a sealed envelope addressed to The College of Wooster, Chair of the Board of Trustees, President's Office, Galpin Hall, Wooster, OH 44691. The sealed envelope will be delivered intact to the Chair of the Board of Trustees.

INVESTIGATION RESPONSIBILITIES

The Administration, in consultation with the Chair of the Board of Trustees, has the primary responsibility for the investigation of all suspected unethical or illegal conduct. The investigation may utilize whatever internal and/or external resources considered necessary. To the extent feasible, the investigation will protect the privacy interests of all affected parties. If an investigation substantiates that unethical or illegal conduct has occurred, appropriate correction action will be taken. In addition, the President or Chair of the Board of Trustees will issue a report to appropriate designated personnel and, if appropriate, to the Board of Trustees.

BAD FAITH REPORTS

This policy shall not be used to bring a complaint in bad faith. Disciplinary action shall be taken against any individual found to have made a false report of unethical or illegal acts in bad faith.