

WHISTLEBLOWER POLICY
OF
BUTLER UNIVERSITY

The University exists to serve its charitable and educational mission and purposes. The University's assets and activities must be directed toward the accomplishment of benevolent, charitable, and educational outcomes, and not diverted or manipulated to serve private interests. To these ends, the Board of Trustees adopts this Whistleblower Policy in order to encourage and empower the University's trustees, officers, employees, and volunteers to report misuse, inappropriate allocation or diversion of the University's charitable and educational resources, including, but not be limited to, the following:

- Theft;
- Unauthorized reimbursement of personal expenses;
- Misallocation of federal, state or philanthropic grant proceeds (i.e., use for a purpose other than as stated in the grant agreement);
- Financial reporting that is knowingly or intentionally misleading;
- Improper or undocumented financial transactions;
- Improper destruction of records;
- Improper use, including unauthorized or undocumented personal use, of assets;
- Any other improper occurrence regarding cash, financial procedures, or reporting;
- Violations of the University's

3. Any reported Misuse that is believed to be credible [**and does not exceed \$10,000**] may be resolved by the President or the President's designee, with a report to the Audit Committee as outlined in Section 2 above; and
4. Any reported Misuse that is believed to be credible [**and exceeds \$10,000**] shall be forwarded to the Audit Committee. The Audit Committee shall afford the person accused of the Misuse an opportunity to defend the accusation in a proceeding that is fair and reasonable. Thereafter, the Audit Committee may further investigate the reported Misuse, as it deems appropriate.

The Audit Committee shall determine whether a Misuse has occurred, with an affirmative finding requiring a two-thirds majority vote of the disinterested committee members. If the Audit Committee determines that a Misuse has occurred, it shall consider and take appropriate action which may include, but not be limited to: (a) requiring the return of any misappropriated assets or funds; (b) removal or dismissal of the person who committed the Misuse; and (c) reporting the Misuse to the appropriate legal and law-enforcement authorities.

No Retaliation

Every trustee, officer, employee,