

## **Smith College**

### **Policy on Protection of Employees Reporting Financial Misconduct**

Smith College employees are expected to adhere to high standards of professional and ethical conduct in carrying out their duties. Maintaining ethical standards, including appropriate accounting, internal controls, auditing and compliance, is the responsibility of every member of the Smith community. Early identification and resolution of ethical issues that might arise are critical to maintaining sound business, including but not limited to financial, practices.

#### Reporting

At Smith responsibilities and decision-making are distributed throughout the organization. While we trust our employees to understand and abide by policies and the law, there are, unfortunately, rare instances of improper, even illegal activity. Any employee who observes, first-hand, financial activities or practices that he or she believes to be against the law or College policy should report these activities to the Controller, College Hall 204. Employees may also submit concerns confidentially and anonymously regarding accounting, internal controls, auditing and compliance matters to the chair of the Audit Committee, c/o The Board of Trustees Office, College Hall 205. Care will be taken to maintain appropriate confidentiality throughout the investigatory phase and for as long as possible.

#### Alternative Reporting

The College intends to monitor all employees' adherence to financial policies. To this end, alternative mechanisms have been established for bringing forward allegations against the key individuals responsible for carrying out this policy. Information regarding actions of the Controller should be reported directly to the Vice President for Finance and Administration. Information regarding actions of the Vice President for Finance and Administration should be reported directly to the President. Information regarding actions of the President should be reported to the Vice President for Finance and Administration, the Controller or the General Counsel, any of whom may consult with the Board of Trustees.

#### Investigating/Results

The Controller is responsible for investigating specific allegations reported to him/her. The Audit Committee is responsible for the investigation of any allegations or concerns reported to the committee. The results of any investigation will be reported to the Vice President for Finance and Administration and the President and, when necessary, to the chair of the Audit Committee of the Board of Trustees. Appropriate action, commensurate with findings, will be taken by the College.

#### Good Faith

The College will take steps to ensure that employees who come forward in good faith will be protected from retaliation in employment practices at Smith. This protection is afforded to all employees who communicate information in good faith and through appropriate channels.

#### Non-financial Misconduct

Non-financial misconduct or misuse should be reported to the appropriate offices, including but not limited to: Human Resources, Provost/Dean of the Faculty, Institutional Diversity, Public Safety, Information Technology Services, Ombudsperson, and General Counsel.