

Whistleblower Protection Policy Saint Martin's University Employee Handbook, Section 4.17.

Saint Martin's University strives to operate in an ethical, honest and lawful manner and expects its faculty, administration, staff and students to conduct their activities in accordance with University policies and applicable law. The University strongly encourages all faculty, administrators, staff and students to report suspected or actual wrongful conduct relating to operations or activities through channels that the University establishes for such reporting. Wrongful conduct includes:

- Financial fraud;
- Unethical business conduct:
- A violation of state or federal law; or
- Substantial and specific danger to the employee's or public's health and safety.

Any employee of Saint Martin's University who in good faith reports an incident as described above will be protected from retaliation and threats of retaliation, and may not be reprimanded or discriminated against in any way for making such a report. In addition, no employee may be adversely affected because the employee refused to carry out a directive, which, in fact, constitutes fraud or is a violation of state or federal law.

Any employee with knowledge of alleged improper activity as described above should contact his or her immediate supervisor, the supervisor's manager, or the Office of Human Resources. Employees are encouraged to provide as much specific information as possible including names, dates, places, and events that took place, the employee's perception of why the incident(s) may be a violation, and what action the employee recommends be taken. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Employees will receive a reply to their report within twenty business days or as soon reasonably possible.

In instances where the employee is uncomfortable for any reason addressing such concerns to the supervisor, supervisor's manager, or Office of Human Resources, or is not satisfied with the response to that report, the employee may contact any of the following individuals.

Chief Human Resources Officer Saint Martin's University 5000 Abbey Way SE Lacey, WA 98503 (360) 688-2290 cjohnson@stmartin.edu

Chief Financial Officer Saint Martin's University 5000 Abbey Way SE Lacey, WA 98503 (360) 688-2470 spowell@stmartin.edu University President Saint Martin's University 5000 Abbey Way SE Lacey, WA 98503 (360) 438-4307 president@stmartin.edu

Patrick Rants, CCIM, CPM SMU Board of Trustees-Chair of Audit Committee The Rants Group (360) 763-4993) pat@rants-group.com