Name of Policy: **Protected disclosures and anonymous reporting line**

Policy Number: 3364-15-05

Approving Officer: President

Responsible Agent: Director of Internal Audit and Chief Compliance Officer

Scope: All University of Toledo Campuses

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<th>New policy proposal</th>
<th>Minor/technical revision of existing policy</th>
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<td>Major revision of existing policy</td>
<td>Reaffirmation of existing policy</td>
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Revision date: June 1, 2016
Original effective date: August 1, 2008

(A) Policy statement

According to federal sentencing guidelines, The University of Toledo ("UT") must provide procedures for employees to report, in good faith, suspected violations of UT policies and federal, state, or local laws and regulations.

(B) Purpose of policy

The purpose of this policy is to provide communication channels for employees to report any activity or conduct that they suspect violates UT’s policies and procedures, and/or federal, state, or local laws and regulations. All concerns reported will be investigated and UT will determine appropriate follow up action.

(C) Procedures

Individuals who have compliance related questions or concerns are encouraged to share them as soon as possible so that appropriate action can be taken. Multiple communication channels are available for employees to ask questions and report concerns. In many cases the individual’s supervisor is in the best position to address the question or concern, but other channels exist as outlined below.

(1) To make a protected disclosure or report any violation of UT policies or any applicable law, contact:
(a) The disclosing individual’s supervisor, either verbally or in writing, or

(b) An appropriate central office, such as the human resources department for employment related issues, or

(c) The anonymous reporting line at 1-888-416-1308, or

(d) The appropriate governmental unit, law enforcement office, or ethics commission after first providing a written communication about the alleged wrongful conduct to the appropriate UT administrator.

(2) The procedure for utilizing the external anonymous reporting line is:

(a) Call 1-888-416-1308,

(b) After the operator answers and provides a greeting, discuss in detail the issue or concern, ask questions, and answer questions the operator may have. The operator will reinforce that the caller does not need to identify him or herself,

(c) Record your password for future reference, and

(d) Access the site with your password within 10 days to receive an update, answer questions from the investigator, or obtain a report on actions taken to date. At this time the investigator can let you know if they need additional time to fully investigate.

The director of internal audit and the compliance officer will review the issue to determine the appropriate department for investigation.

(3) Upon receiving a report, UT will notify the individual, acknowledge receipt of the report, and conduct an investigation that can take more than 10 days but will be completed within 45 days of the receipt of the question or concern unless more time is necessary to thoroughly investigate.
(4) Upon completion of an investigation, UT can take appropriate disciplinary action based on the report, up to and including termination.

(5) The outcome of the investigation is communicated to the complainant. The means of communicating the outcome depends on the means in which the complaint was communicated (i.e., in writing, phone, etc.) The outcomes of the investigations received via the anonymous reporting line are documented in the anonymous reporting line database.

All members of the UT community (including students) seeking to raise concerns should speak directly with the responsible UT office. Student employees who have concerns regarding their UT job can use the reporting options listed above.

(D) Confidentiality and good faith disclosures/reports

UT will attempt to maintain confidentiality of an individual who makes a protected disclosure or report of suspected compliance violations or concerns. Protected disclosures and reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, and in accordance with the Ohio Public Records Act.

Any individual making a protected disclosure concerning a suspected violation of UT policies must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policies. There is no retribution or discipline for anyone who reports a concern in good faith even if the report be unsubstantiated.

Individuals, who knowingly or with reckless disregard for the truth give false information, knowingly make a false report of wrongful conduct, or knowingly make a subsequent false report of retaliation will be subject to disciplinary action, up to to and including termination.

(E) Compliance

All UT employees, students, volunteers, agents or contractors are expected to understand and follow UT policies and/or federal, state, and local laws and regulations. Individuals are encouraged to report compliance concerns to maintain the mission of UT.
UT, in compliance with Ohio Revised code (ORC) §4113.52, is committed to protecting individuals from interference with making a protected disclosure and from retaliation for having made a protected disclosure. See the Non-Retaliation Policy: 3364-15-04.

Individuals who wish to be protected by the Ohio Whistleblower Protection Act must provide a written report, as referenced in section (C)(1)(e) of this policy, that provides sufficient detail to identify and describe the alleged violation.

(F) Definitions

(1) Protected disclosure. Reports about actual or suspected wrongful conduct engaged in by a UT employee, student, volunteer, agent or contractor (who is not the disclosing individual) based on a good faith and a reasonable belief that the conduct has both occurred and is wrongful under applicable law and/or UT policy.

(2) Wrongful conduct. A serious violation of UT policy; a violation of applicable state and federal laws; or the use of UT property, resources or authority for personal gain or other non-university-related purposes except as provided under UT policy.

(3) Retaliation. Disciplinary or adverse action taken against an individual because she or he has made a protected disclosure or has participated in an investigation, proceeding, or hearing involving a protected disclosure.

(4) Anonymous reporting line. The anonymous reporting line is an external service provider that collects and documents information provided on the call. It operates seven days a week, twenty four hours a day, and three hundred sixty five days a year.
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<tr>
<th>Approved by:</th>
<th>Policies Superseded by This Policy:</th>
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<tr>
<td>Sharon L. Gaber, Ph.D. President</td>
<td>• Previous 3364-15-05, Anonymous reporting line, effective date November 19, 2009</td>
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<tr>
<td>May 10, 2016 Date</td>
<td>Initial Effective Date: August 1, 2008</td>
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<tr>
<td>Review/Revision Completed by: Director of Internal Audit and Chief Compliance Officer</td>
<td>Review/Revision Date: November 19, 2009; June 1, 2016</td>
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<td>Next Review Date: June 1, 2019</td>
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