PURPOSE OF POLICY

This policy establishes guidelines for reporting suspected or actual wrongful conduct at Morehouse College (“the College”) and describes the College’s principles and practices for the confidential, anonymous submission by employees of concerns regarding the manner in which the College conducts its business, including violations of law, rules, regulations, policies and procedures or the College’s Code of Conduct (“the Code”).

SCOPE OF POLICY

This policy is applicable to all staff employees and faculty of the college.

POLICY STATEMENT

The College is committed to protecting individuals from interference with making a protected disclosure, from retaliation for having made a protected disclosure, or for having refused to participate in wrongful conduct. It is, therefore, the responsibility of all directors, officers, and employees, to comply with the Code of Conduct (“the Code”) and to report suspected violations in accordance with the Whistleblower Policy.

PROTECTION FROM RETALIATION

The College will use its best efforts to protect whistleblowers against any form of retaliation. No director, officer, employee, or student who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.
Although the College encourages employees to report concerns to their immediate Supervisor, Manager or other official, there are times when an employee may feel it is necessary to report a concern outside of the traditional reporting mechanism. The College has adopted this Whistleblower Policy for these instances.

**REPORTING VIOLATIONS**
The Code addresses the College’s open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee’s Supervisor or Manager is in the best position to address concerns. However, if you are not comfortable speaking with your Supervisor or Manager, or if you are not satisfied or feel uncomfortable with their response to your complaint, or for suspected fraud, you are encouraged to speak with the Ethics and Compliance Officer or the Chief Audit Officer as outlined in the College’s Non-Retaliation Policy. In addition, should you wish to report your concerns anonymously, you may contact the College’s EthicsLine 24/7 by calling 1-888-299-9540 or by reporting on-line at www.tnwinc.com/Morehouse.

The Ethics and Compliance Officer and the Chief Audit Officer are responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at their discretion, will advise the President and the Audit Committee of the Board of Trustees (“Audit Committee”). The Ethics and Compliance Officer and the Chief Audit Officer have direct access to the Audit Committee Chair and are required to report to the audit committee at least semi-annually on compliance activity.

**ACTING IN GOOD FAITH**
Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense subject to disciplinary action up to and including termination of the individual’s employment from the College.

**CONFIDENTIALITY**
Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. The College will keep the whistleblower’s identity confidential, unless (1) the person agrees to be identified; (2) identification is necessary to allow the college or law enforcement officials to investigate or respond effectively to the report; (3)
identification is required by law; (4) the person accused of illegal or improper activities is entitled to the information as a matter of legal right in disciplinary hearings. In addition, a whistleblower’s right to protection from retaliation does not extend to immunity from any complicity in the matters that are the subject of the allegations or an ensuing investigation.