


THE COLLEGE OF
WOOSTER

OFFICE OF THE VICE PRESIDENT FOR FINANCE & BUSINESS
OFFICE MEMORANDUM

TO: All Faculty and Staff

FROM: John W. Sell 

DATE: 16 October 2008

RE: Ethics Hotline

In 2002, Congress passed the Sarbanes-Oxley Act, which established new rules to protect investors in for-profit, publicly traded companies by improving the accuracy and reliability of corporate disclosures. As a non-profit, The College of Wooster is not subject to Sarbanes-Oxley. The College's Board of Trustees, however, has decided voluntarily to adopt some measures contained in the Act, including the establishment of a mechanism for reporting the sort of fraudulent activity targeted by Sarbanes-Oxley, as well as other important sensitive issues.

Therefore, the College has created an Ethics Hotline to receive calls concerning suspicions of accounting or auditing fraud, theft, misappropriation of assets, conflict of interest, unethical behavior, and other serious issues. Callers may remain anonymous or identify themselves, at their discretion. The hotline, which is available 24 hours a day, is provided by an independent, third-party service, ComplianceLine, which will document the caller's concerns and forward them to the appropriate College entity.

The Ethics Hotline number is 800-729-1420.

It is important to note that neither the board nor the administration believes that Wooster has a problem in these areas. Rather, they feel that the establishment of this anonymous reporting system will strengthen the safeguards already in place for the College and all its stakeholders. *For normal business issues that are less serious than the ones described above, please continue to contact the Human Resources Office so that they can direct you appropriately.*

The College of Wooster

Ethics Policy

INTRODUCTION

The College of Wooster is committed to the highest possible standards of ethical and legal business conduct. In keeping with that commitment, the College desires to provide an avenue for officers, trustees, and employees (including student employees) to raise concerns about the College's conduct with the assurance that they will be protected from reprisals for good faith reports about unethical or illegal conduct on the part of a member of the College community.

POLICY

The College of Wooster officers, trustees, and employees have a responsibility, in the discharge of their college duties, to abide by federal and state laws and regulations as well as College policies. Any officers, trustees, and employees who have knowledge of specific acts which he or she reasonably believes violates the law or College policy should disclose those acts to an appropriate College official. The College has a responsibility to investigate any alleged improper activities and may discipline any individual found to have engaged in such conduct, up to and including termination of employment. The College reserves the right to refer such conduct for civil and criminal prosecution.

REPORTING PROCEDURE

Reports of unethical or illegal conduct may be made to the appropriate Vice President to whom the individual engaging in such improper activity reports. If, for any reason, an individual finds it difficult to report her/his concerns to the relevant Vice President, The College has established an Ethics Hotline ensuring the individual's anonymity. The Ethics Hotline number is 800 749-1820. For additional Ethics Hotline information go to the Human Resources webpage at <http://www.wooster.edu/humanresources/>. No individual who makes a report in good faith or participates in an investigation in good faith shall suffer retaliation or reprisals for being involved. The College will take the necessary action to assure that retaliation does not occur. An individual who believes that she/he has been retaliated against may file a written complaint in a sealed envelope addressed to The College of Wooster, Chair of the Board of Trustees, President's Office, Galpin Hall, Wooster, OH 44691. The sealed envelope will be delivered intact to the Chair of the Board of Trustees.

INVESTIGATION RESPONSIBILITIES

The Administration, in consultation with the Chair of the Board of Trustees, has the primary responsibility for the investigation of all suspected unethical or illegal conduct. The investigation may utilize whatever internal and/or external resources considered necessary. To the extent feasible, the investigation will protect the privacy interests of all affected parties. If an investigation substantiates that unethical or illegal conduct has occurred, appropriate correction action will be taken. In addition, the President or Chair of the Board of Trustees will issue a report to appropriate designated personnel and, if appropriate, to the Board of Trustees.

BAD FAITH REPORTS

This policy shall not be used to bring a complaint in bad faith. Disciplinary action shall be taken against any individual found to have made a false report of unethical or illegal acts in bad faith.