SAN MARCOS UNIVERSITY CORPORATION
WHISTLEBLOWER PROTECTION POLICY

I. INTRODUCTION
This Whistleblower Protection Policy is intended to encourage and enable the raising of serious concerns internally so that the San Marcos University Corporation (hereinafter “University Corporation”) can address and correct inappropriate conduct and actions. It is the responsibility of all University Corporation board members, and any committee members, officers, employees, volunteers or other individuals acting for or on behalf of the University Corporation to report concerns about conflicts with the University Corporation’s Conflict of Interest/Standards of Conduct Policies or suspected violations of law or regulations that govern the University Corporation’s operations.

II. POLICY STATEMENT
San Marcos University Corporation requires it’s Board of Directors and members of standing committees or other similar sub-boards, officers, any employees, volunteers or individuals acting for or on behalf of the San Marcos University Corporation, to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The University Corporation’s reputation and credibility depends in large measure upon the consistent practice of honesty and integrity in all operations and matters.

III. TERMS AND DEFINITIONS
Compliance Officer – The Compliance Officer designated to receive, investigate and respond to complaints is the University Corporation’s Executive Director. The Chair of the San Marcos University Corporation’s Board of Directors serves as the alternate point of contact for receiving and processing complaints under this policy.

Retaliation – to return like for like, reprisal.

Good Faith Actions – Honesty or sincerity of actions.

IV. POLICY GUIDELINES AND PROCEDURES
Guidelines

A. No Retaliation – It is contrary to the values of the University Corporation for anyone to retaliate against those who in good faith report a suspected conduct of standards violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, or suspected breaches of organization policy. Retaliation against someone who has reported a violation in good faith shall be considered a serious breach of the University Corporation’s Conflict of Interest and Standards of Conduct Policies.

B. Acting in Good Faith – Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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 misconduct.

C. Responsibility of Compliance Officer – The Compliance Officer is responsible for ensuring that all complaints about suspected unethical or illegal conduct are investigated and resolved. The Compliance Officer will advice the University Corporation’s officers and Board of Directors of all complaints and their resolution and will report at least annually to the Board of Directors through the officers on compliance activity relating to any complaints, including any accounting or alleged financial improprieties.

Procedures

A. Reporting Procedure – Complaints or concerns about suspected ethical and legal violations should be reported to the University Corporation’s Compliance Officer who has the responsibility to investigate all reported complaints.

B. Handling of Complaints – The Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly
investigated and appropriate corrective action will be taken if warranted by the investigation.

C. Accounting and Auditing Matters – The Compliance Officer shall immediately notify the University Corporation’s officers of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the University Corporation’s Board of Directors until the matter is resolved.

D. Confidentiality - Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

V. ADOPTION AND REVIEW

A. The San Marcos University Corporation’s Board of Directors has adopted this Whistleblower Protection Policy, dated December 7, 2012.

B. This policy shall be evaluated periodically to determine its effectiveness and appropriateness. The policy may be evaluated as necessary to reflect substantial organizational, financial, or physical change(s) at the University Corporation or any change required by law or by other governing policy.

Any proposed amendments or variations of this policy would require a majority approval by the San Marcos University Corporation Board of Directors.

Adopted by Board Action 12.7.2012