

WHISTLEBLOWER POLICY

Molloy College (“College”) has a responsibility for the stewardship of the College’s resources and the public and private support that enables it to pursue its mission. As members of the Board of Trustees, employees and representatives of the College, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Therefore, any suspected intentional fraudulent activity, violations of laws, regulations, policies and procedures of the College must be reported in accordance with this policy.

Reporting

All members of the College community, including the Board of Trustees, employees, directors, officers, students, vendors and alumni, may report instances of suspected improper conduct existing within the College that they reasonably believe constitutes a suspected intentional or unintentional fraudulent activity, violation of laws, regulations, policies, and procedures of the College. Allegations of improper activities shall be made in writing to the College’s designated Compliance Officer. Such reports shall contain as much detail and specific information including names, dates and times as possible. You can also report your allegations orally or in writing through either of the following: Molloy College Whistleblower Confidential Hotline: (844)719-2851 or www.molloy.ethicspoint.com .

When there is a potential conflict of interest or if the College’s designated Compliance Officer is the subject of the report, such report may be made to the Vice President for Finance and Treasurer. All reports will be investigated promptly, thoroughly and with discretion. At the conclusion of the investigation, remedial and/or disciplinary action will be taken where the allegations are substantiated.

Acting in Good Faith

Anyone filing a 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 to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Compliance Officer

The Director of Human Resources serves as the College’s Compliance Officer. The College’s Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the President and/or Vice President. The Compliance Officer is also required to report to the Fiscal Affairs and Audit Committee at least annually on compliance activity.

Accounting and Auditing Matters

The Fiscal Affairs and Audit Committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls over financial reporting or auditing. The Compliance Officer shall immediately notify the Fiscal Affairs and Audit Committee of any such complaint and work with the committee until the matter is resolved.

Confidentiality

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

No Retaliation

No member of the College community including a trustee, employee, director, officer, student, vendor, volunteer or alumnus, who in good faith reports any action or suspected action taken by or within the College that is illegal, fraudulent or in violation of any adopted policy of the College shall suffer intimidation, harassment, discrimination or other retaliation or additionally, in the case of employees, adverse employment consequence. An individual who retaliates against someone who has reported a violation in good faith are subject to the standard disciplinary procedure set forth by procedures specified in the Disciplinary Policy and Procedure section of the Employee Handbook, and the Dismissal Policy section of the Faculty Handbook and the Due Process Procedure for Student Discipline in Non-Academic Areas as defined in the Student Handbook.

Retention

The Compliance Officer will maintain a log of all reports of suspected violations, tracking their receipts, investigation, and resolution, and shall prepare a periodic summary report thereof for the Fiscal Affairs and Audit Committee. Copies of reports of suspected violations and such log will be maintained in accordance with the College's document retention policy.

Distribution of Policy

A copy of this policy will be distributed to all members of the Board of Trustees, employees, directors, officers, students, alumni and vendors who provide substantial services to the College. The Whistleblower Policy will also be posted on the College's website.

This Whistleblower Policy is intended to ensure that Molloy College is compliant with all regulations, laws and standards in all that it does to encourage and enable individuals of the College community to raise serious concerns within the College prior to seeking resolution outside of the College.