



WHISTLEBLOWER POLICY

**Adopted by the ESU Foundation Board November 20, 2013
Amended/Updated November 20, 2025**

It is the intent of the East Stroudsburg University Foundation (the “Foundation”) to adhere to all applicable laws and regulations. This policy is designed to encourage directors, officers, employees, and volunteers to come forward with credible information on suspected illegal practices or violations of the Foundation’s policies and to facilitate cooperation in any official inquiry or investigation by any court, agency, or other law enforcement or governmental body. The Foundation will protect any person who has in good faith raised a concern or reported any such violation from retaliation or threats of retaliation. The purpose of this policy is to support the Foundation’s goal of legal compliance and to identify where information regarding suspected violations can be reported.

Reporting unlawful activity

The Foundation encourages its directors, officers, employees, and volunteers to raise good faith concerns about suspected illegal practices and violations of the Foundation’s policies, including illegal or improper conduct by the Foundation itself, by its leadership, or by others on its behalf, and to provide truthful information in official inquiries or investigations. Appropriate subjects to be raised under this policy include:

- Conflicts of interest
- Incorrect financial reporting
- Unlawful activity
- Activities that are not in line with Foundation policy
- Any other activities that constitute serious improper conduct

Protection from retaliation

The Foundation prohibits retaliation by or on behalf of the Foundation against directors, officers, employees, or volunteers for making good faith complaints, reports or inquiries under this policy or for providing information in any official inquiry or investigation. This protection extends to those individuals whose allegations are made in good faith but proven to be mistaken. The Foundation reserves the right to discipline individuals who report false allegations that are both unsubstantiated and made with malice or who otherwise abuse this policy. Individuals who self-report their own misconduct are not afforded protection by this policy; however, early disclosure may be considered in disciplinary decisions.

Where to report

Complaints, reports or inquiries made under this policy shall be kept confidential and anonymous to the extent possible. Complaints, reports, and inquiries should describe in detail the specific facts demonstrating the basis for the belief that illegal or improper conduct has occurred. Complaints, reports, and inquiries should be directed to the Foundation’s Executive Director, Chairman of the Board of Directors, Vice President of the Foundation Board of Directors, or the Senior Director of Finance and Administration. If multiple individuals listed are implicated in the complaint, report or inquiry, it should be directed to the remaining appropriate party.

Procedure

The appropriate officers will conduct a prompt, discreet, and objective review or investigation and provide a report to the Board of Directors. The investigation shall be initiated within 30 days of receiving the complaint and completed within 60 days unless extended for good cause. The Board of Directors shall determine an appropriate response to a complaint, report, or inquiry. Any officer, director, employee, or volunteer who may be implicated in the complaint, report, or inquiry shall not participate in any deliberation of the Board of Directors regarding the complaint, report, or inquiry, except to present information on his or her own behalf. Directors, officers, employees, and volunteers must recognize that the Foundation may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

Recordkeeping

The Foundation shall maintain secure records of all complaints, investigations, and outcomes under this policy. These records shall be retained in accordance with applicable laws and internal record retention policies.

Training and Awareness

At the beginning of each fiscal year, the Foundation shall provide a copy of the Foundation's Whistleblower Policy to each director, officer, employee, and volunteer for review. In addition, the Foundation shall conduct annual training or briefing sessions to reinforce understanding and encourage use of the policy.

Policy Review Cycle

This policy shall be reviewed and updated at least every two years or as needed based on legal or Organizational changes.