

## **UNIVERSITY OF WEST FLORIDA BUSINESS ENTERPRISES, INC. (BEI)**

**POLICY #:** BEI 1.03 – 4/13

**EFFECTIVE DATE:** April 12, 2013

**POLICY/PURPOSE:** **WHISTLEBLOWER PROTECTION** – To protect employees from retaliation or the fear of retaliation in reporting illegal or unethical conduct.

**RESPONSIBLE OFFICE:** BEI

**1. APPLICABILITY:** BEI employees.

### **2. POLICY**

BEI strives to maintain the highest level of stewardship. Employees are expected to observe the applicable provisions of the Code of Ethics Policy, BEI 1.01 – 4/13. Fraudulent and other wrongful acts will not be tolerated. Should any person know of, or have a suspicion about, illegal or unethical conduct or fraud in connection with the finances or any other aspect of BEI operations, that person should inform the BEI Chief Executive Officer or the Vice President for Business, Finance, and Facilities. Such concerns may involve employees, members of the Board, consultants, vendors, contractors, or outside agencies. If the alleged wrongdoing concerns the BEI Chief Executive Officer or the Vice President for Business, Finance, and Facilities, then the President of the University, Associate Vice President, Internal Auditing and Management Consulting, or any member of the UWF General Counsel's Office may be notified instead.

BEI will establish a prominent Whistleblower contact page on its website providing the contact information for UWF Associate Vice President for Internal Audit and Management Consulting to insure availability to the public and/or all persons wishing to remain anonymous. Details of the allegations against an individual employee received through this website contact shall be forwarded to the Associate Vice President for Human Resources who shall follow established university protocols for coordinating the investigation of all credible allegations.

If the BEI Chief Executive Officer, the Vice President for Business, Finance, and Facilities, any officer or director working on behalf of BEI, or any manager or employee in a supervisory role receives information regarding alleged illegal or unethical conduct in connection with the finances or any other aspect of BEI operations, that person shall promptly inform the UWF Associate Vice President for Internal Auditing and Management Consulting, who shall follow established university protocols and state law for coordinating the investigation and response as appropriate.

At all times respecting the privacy and reputation of individuals involved, the UWF AVP of Internal Auditing and Management Consulting shall inform the BEI Chief Executive Officer and the Vice President for Business, Finance, and Facilities (or the University President if the BEI Chief Executive Officer or the Vice President for Business, Finance, and Facilities is involved). The BEI Chief Executive Officer and the Vice President for Business, Finance, and Facilities shall inform the BEI Board of Directors if any material allegation is confirmed and it is believed the Board of Directors should be made aware of the situation.

BEI will not retaliate against an employee who in good faith, has made a protect or raised a complaint against some practice of BEI, the Chief Executive Officer thereof that the person reasonably believes is in violation of law, or a rule, or regulation mandated pursuant to a law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, of BEI or the University. There will be no punishment or other retaliation for the reporting of conduct pursuant to this policy. If the person providing the information requests anonymity, this request will be respected to the extent that doing so does not impede any investigation.