

# KANSAS STATE UNIVERSITY FOUNDATION

Title	Whistleblower Policy	Version	6
Approved By	Kansas State University Foundation Board of Directors	Approval Date	06/16/2023
Approved By	Governance Committee	Approval Date	06/15/2023
Liaison to the Committee	Greg Lohrentz (Senior Vice President of Operations and Finance - COO/CFO)		

**Printed copies are for reference only. Please refer to the electronic copy for the latest version.**

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## **Rationale**

The Board of Directors (hereinafter the "Board") for the Kansas State University Foundation (hereinafter the "Foundation") has adopted a formal mission statement, vision statement and values statement. All board members, officers and employees of the Foundation are expected to be diligent in conducting all activities in a manner consistent with the Foundation's values of respect, diligence and integrity which should guide interactions, decisions and work. It is therefore the responsibility of all board members, officers and employees to report wrongful conduct in the form of violations or suspected violations of the Foundation's policies in accordance with this Whistleblower Policy.

## **Applies To**

All Board Members, Officers and Employees of the Foundation.

## **Policy**

It is the purpose of this policy to protect persons who, in good faith, report suspected incidents of illegal conduct, including but not limited to: theft; financial reporting that is intentionally misleading; improper or undocumented financial transactions; improper destruction of records; improper use of assets; violations of the Foundation's conflict-of-interest policy; and any other improper occurrences related to the Foundation's handling of cash, financial procedures, accounting or financial reporting.

Should any board member, officer or employee know or have a reasonable belief that persons associated with the Foundation plan to engage or have engaged in any of the conduct identified above, that person should immediately file a complaint in accordance with this policy. Reports of violations or suspected policy violations are kept confidential to the extent possible, as is consistent with the need to conduct an adequate investigation.

This policy is intended to encourage and enable employees and others to raise serious concerns within the Foundation. No board member, officer or employee who makes a report under this policy shall suffer harassment, retaliation, or adverse employment consequences as a result of the report. An employee who retaliates against someone who has made a report under this policy is subject to disciplinary action, up to and including termination of employment.

Anyone making a report under this policy must act in good faith and have reasonable grounds for believing the matter raised implicated the conduct identified above. Any board member, officer or employee who knowingly or with reckless disregard for the truth gives false information or knowingly makes a false report of wrongful conduct or a subsequent false report of retaliation will be subject to disciplinary action, up to and including termination.

This policy will be distributed annually to all board members and officers in conjunction with the completion of the conflict-of-interest statement. Foundation employees will receive this policy as a part of their new employee orientation. Additionally, the policy will be distributed electronically to employees in a manner that provides for documentation that the employee has had the opportunity to read and understand the policy as well as ask questions about the policy.

## **Reporting**

Board members and officers should report conduct identified above to the Foundation's CEO unless the CEO is the implicated person. If that is the case, the Chairman of the Board of Directors should be notified. Employees may report wrongful conduct by talking with his/her immediate supervisor, to the Vice President of Culture & Engagement, the Sr. Director of Compliance Services or the Foundation's CEO. Additionally, the Foundation has partnered with EthicsPoint to provide an easy-to-use external pathway for employees to report, misconduct implicated by this policy. EthicsPoint is accessed through a web portal at [www.k-statefoundation.ethicspoint.com](http://www.k-statefoundation.ethicspoint.com) or the toll-free hotline at 855-446-5251. Reports of wrongful conduct may be submitted on a confidential basis by the complainant or may be submitted anonymously. Please note, however, that submitting an anonymous complaint may limit the Foundation's ability to investigate and ultimately remedy the reported conduct.

If the reported concerns or complaints are with regards to corporate accounting practices, internal controls or auditing and taxation, the Sr. Director of Compliance Services is responsible for investigating and resolving complaints and allegations. The Sr. Director of Compliance Services will notify the appropriate committee of any such complaint and work with the committee until the matter is resolved. The Vice President of Culture & Engagement is responsible for investigating all other types of complaints. As appropriate the complainant will be notified of the resolution of the investigation. See the [Whistleblower Procedure](#) and the EthicsPoint web portal for specific information regarding reporting a complaint.

The Foundation shall take appropriate action in response to any complaint, including, but not limited to, disciplinary action (up to and including termination) against any person who, in the

Foundation’s assessment, has engaged in misconduct. In addition, the Foundation shall report such misconduct to the relevant civil and criminal authorities as required by law.

### Definitions

Term	Definition
None Defined	

### References & Links

[Disciplinary Policy](#)

[Disciplinary Procedure](#)

EthicsPoint web portal: [www.k-statefoundation.ethicspoint.com](http://www.k-statefoundation.ethicspoint.com)

[Whistleblower Procedure](#)

### Contact

Department or Person	Phone Number
Vice President of Culture & Engagement	785-775-2011
Associate Vice President of Compliance Services	785-775-2103
Ethics Point Toll-free	855-446-5251