

CALIFORNIA STATE UNIVERSITY NORTHRIDGE FOUNDATION

POLICY ON REPORTING AND INVESTIGATING ALLEGATIONS OF SUSPECTED IMPROPER GOVERNMENTAL ACTIVITIES (WHISTLEBLOWER POLICY)

Purpose

In accordance with California State University Executive Order #929, this policy sets forth the procedures and guidelines when the Foundation accepts any written complaints regarding its operation as an auxiliary of the California State University. It is the intention of this policy to also outline the Foundation's compliance with federal and state laws and regulations, including but not limited to the California Whistleblower Protection Act, in reference to suspected improper governmental activities.

The California State University Northridge Foundation requires directors, officers, and other affiliated personnel to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. It is expected that all Foundation representatives practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. It is also the responsibility of all directors, officers, and other affiliated personnel to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, or other affiliated personnel who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. A director, officer, or other affiliated personnel who retaliate against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Reporting Violations

The Foundation's Board of Directors strongly encourages an open door policy and suggests that concerned individuals share their questions, concerns, suggestions, or complaints with the Foundation President and/or Chief Financial Officer. However, if the concerned individual is not comfortable speaking with those individuals, communication with the Foundation's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations, is strongly encouraged.

Complaints must be in writing and be directed to the Foundation's Compliance Officer and should include the following:

1. The name and mailing address of the complainant, the complainant's working title, or the position applied for.
2. A detailed description of the specific actions that constituted the alleged improper governmental activity or condition that may significantly threaten the health or safety of employees or the public, including the name(s) and title(s) of CSU

- employee(s) or official(s) allegedly engaged in the improper governmental activity or responsible for the health or safety condition.
3. The date(s) the alleged improper activities occurred or the condition developed.
 4. Other potential witnesses to the alleged improper activities or condition.
 5. Any documentation that supports the allegations of improper activities or of a threatening condition.
 6. Descriptions of documents that support the allegations of improper activities or of a threatening condition, if the actual documents are not in the possession of the complainant.
 7. The protected disclosure must be signed, dated, and contain a sworn statement under penalty of perjury that its contents are believed to be true.

Compliance Officer

The Foundation's Compliance Officer is designated as the University's Associate Vice President for Human Resources. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning improper governmental activity and, at his/her discretion, shall advise the Foundation President, Chief Financial Officer, and/or the Audit Committee. The Compliance Officer is required to report to the Audit Committee at least annually on compliance activity.

Accounting and Auditing Matters

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

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates improper governmental activity. 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 disciplinary offense.

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, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.