

Whistle Blower Policy

ICI's Board of Directors approved a Whistle Blower Policy on April 13, 2010, effective on July 1, 2010. The policy is outlined below. To report a suspected violation or other behavior prohibited by this policy please see the "*Contact Information for Reporting*" section below.

Policy:

1. Purpose:

To provide a mechanism for ICI employees, board members and/or suppliers to raise good faith concerns regarding suspected violations of law, policies or ethics, or to report suspected fraudulent activity on the part of the ICI staff and/or Board of Directors, to cooperate in an inquiry or investigation regarding same, and to protect employees who take such actions from retaliation.

2. Reportable Behavior and Path:

- A. Independent Colleges of Indiana is committed to maintaining a workplace where employees, members of the Board of Directors, and suppliers are free to raise good faith concerns regarding ICI ethical conduct and/or business practices, specifically:
 - (1) Reporting suspected violations of law on the part of ICI, including but not limited to federal laws and regulations;
 - (2) Providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body;
 - (3) Identifying potential violations of ICI policy.
 - (4) Reporting fraudulent activity.
- B. Any person paid by ICI, whether part-time or full time, who wishes to report a suspected violation of law, unethical behavior, suspected fraudulent activity or violation of ICI policy may do so confidentially by contacting the Chair of the ICI Audit Committee; see paragraph 4 below.
- C. Any supplier who wishes to report a suspected violation of law, unethical behavior, suspected fraudulent activity or violation of ICI policy may do so confidentially by contacting the Chair of the ICI Audit Committee; see paragraph 4 below.
- D. Any board member who wishes to report a suspected violation of law, unethical behavior, suspected fraudulent activity or violation of ICI policy by ICI staff or other board member may do so confidentially by contacting the Chair of the ICI Audit Committee; see paragraph 4 below.
- E. In the event that a report of a suspected violation of law, policy, ethics, fraudulent activity or retaliation involves the Chair of the ICI Audit Committee, the report should be directed to the Chair of the ICI Board of Directors, and, with the remaining members of the Executive Committee, the Board Chair will conduct any required investigation. See paragraph 4 below.

3. Retaliation Protection:

- A. ICI expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against staff or Board members who raise suspected violations of law, cooperate in inquiries or investigations, or identify potential violations of ICI policies. Any staff or Board member who engages in retaliation will be subject to discipline, up to and including termination.
- B. Any staff or Board member who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of law or policy should immediately report the retaliation to the Chair of the ICI Audit Committee. Anyone who receives complaints of retaliation must immediately inform the Chair of the ICI Audit Committee. See paragraph 4 below.
- C. Reports of suspected violations of law or policy and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality, consistent with a full and fair investigation. The investigating parties, the Executive Committee of the ICI Board, will notify the concerned individual(s) of their findings directly. A summary of all such reports will be presented to the ICI Board of Directors.
- D. In the event that a report of a suspected violation of law, policy, ethics or retaliation involves the Chair of the ICI Audit Committee, the report should be directed to the Chair of the ICI Board of Directors and, with the remaining members of the Executive Committee, the Chair will conduct any required investigation.

4. Contact information for reporting under this policy for the fiscal year beginning July 1, 2010: The name and affiliation of the chair and other officers of ICI shall be posted on the ICI website as follows:

Web address: www.icindiana.org
Click on: “About ICI” button on the left side
ICI telephone: 317-236-6090

Contact Information for Reporting

For reporting a suspected violation or other behavior prohibited by the policy please contact the appropriate party listed below:

- Chair of the ICI Audit Committee: Dr. Patrick E. White
 President, Wabash College
 P.O. Box 352
 Crawfordsville, IN 47933
 Telephone: 765-361-6100

- Chair of the ICI Board of Directors: Dr. Jo Young Switzer
 President, Manchester College
 604 E. College Ave.
 North Manchester, IN 46962
 Telephone: 260-982-5000

- For the list of the ICI Board Directors: website: www.icindiana.org
 Click on: “About ICI” (left side of page)
 Click on: “Board of Directors and Officers”