

Ethics and Integrity Internal Reporting Process

Gettysburg College is committed to ethics, integrity and high standards in all of its business practices ("Conduct Standards"). Individuals associated with Gettysburg College are expected to act in a manner that reflects these Conduct Standards. For purposes of this policy, the term "associated with Gettysburg College" means faculty, employees, students, and visitors (collectively "College Associate(s)"). The Conduct Standards are more specifically expressed in the Faculty Handbook, Employee Handbook, Student Rights and Responsibilities Handbook, and other policies that are part of the College's Ethics and Integrity Program.

This policy has been approved by the Board of Trustees, the Audit, Compliance and Risk Committee, and the President's Council. The College's Ethics and Integrity Officer oversees this policy, in coordination with the Designated Authorities (as defined below).

Policy Statement:

- Any College Associate with a question or concern relating to potential illegal or dishonest activity or other misconduct involving the College's business affairs or the use and management of College resources and information (a "Concern") is encouraged to report the Concern using the process described below under the section on "Ethic and Integrity Internal Reporting Process."¹
- The College will not tolerate retaliation against any College Associate reporting a concern. Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment. Any College Associate who believes he/she is being retaliated against should contact the Ethics and Integrity Officer. If retaliation is found to have occurred, immediate and appropriate action will be taken to stop the retaliation, prevent its recurrence, and correct its effects. The College may take disciplinary action (up to and including termination) against any employee who has engaged in retaliatory conduct in violation of this policy.
- Confidentiality will be maintained throughout the investigation, to the extent permitted by law, and as otherwise may be reasonably required to conduct an investigation.

Ethics and Integrity Internal Reporting Process

Any College Associate with a Concern is encouraged to report it by calling the Gettysburg College Ethics and Integrity Hotline (1-844-362-9797). These reports will then be automatically directed to the College's Ethics and Integrity Officer, who will forward the information to one of the following individuals, depending on the nature of the Concern

¹ The Standards of Conduct Policy includes the process to report concerns related to sexual misconduct, harassment, and discrimination.

(identified collectively as Designated Authorities):

Designated Authorities are:

- Vice Provost
- Executive Director of Human Resources
- Director of Student Rights and Responsibilities

In the alternative, Concerns may also be reported to an immediate supervisor, Human Resources, or directly to the Ethics and Integrity Officer.

Concerns about the Ethics and Integrity Officer or the President should be directed to the Chair of the Audit, Compliance and Risk Committee or the Chair of the Board of Trustees.

Reports should contain as much factual information as possible, including dates, names and any other information that can be corroborated to support the investigation.

Concerns filed in good faith that prove to be unfounded will not be subject to disciplinary action. A College Associate who knowingly files a false or materially misleading Concern is subject to disciplinary action.

Investigation Procedure

The College Associate who reports the Concern is not responsible for, nor is the College Associate the appropriate party to, investigate the activity or for determining fault or the need for corrective measures. All Concerns reported under this policy will be promptly, thoroughly, and impartially investigated.

The Ethics and Integrity Officer will oversee and coordinate any investigations undertaken pursuant to this policy.

The Ethics and Integrity Officer will review the Concern with the Designated Authority, determine the level of investigation the Concern warrants, identify the appropriate party to perform the investigation, determine if the facts do or do not support the Concern, and recommend any corrective actions. Designated Authorities will coordinate action with the Ethics and Integrity Officer.

The College will take appropriate corrective action to ensure that the Conduct Standards are upheld. If an investigation determines that corrective action is necessary, the corrective action will be implemented in accordance with the applicable Conduct Standards, e.g., the Faculty Handbook, Employee Handbook, and/or the Student Rights and Responsibilities Handbook.

Questions regarding this policy should be directed to the Ethics and Integrity Officer.