

ROLLINS COLLEGE

Policy for Reporting Possible Financial Misconduct

General

In keeping with our desire to maintain the highest possible standards in safeguarding the College's financial resources and the integrity of its financial reporting systems and internal controls, the College has formalized a reporting procedure for faculty and staff who observe or suspect financial misconduct. This action flows from our desire to achieve voluntary compliance with the federal Sarbanes-Oxley Act's best practices that apply to public corporations.

Reporting Suspected Misconduct

Any knowledge or concern about possible financial misconduct, including theft, fraud, kickbacks or questionable financial practices, should be reported promptly to your immediate supervisor or department head. If the matter is not satisfactorily resolved at this level or if the supervisor or department head is involved in the suspected misconduct, the concerns should be reported to the appropriate dean, director, vice president or the president. In all cases the individual to whom a matter is reported is to promptly notify the Human Resources Department which will be responsible for providing guidance and confidential record keeping.

In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you do not feel comfortable reporting through normal College channels, you may convey your concerns anonymously by letter to the designated College attorney. Mr. James (Trippe) Cheek III at Winderweede, Haines, Ward & Woodman, P.A., 329 N. Park Avenue, Second Floor, Winter Park, Florida 32789 is currently serving in this capacity. The responsibility of the attorney is to pass information received on to the chair of the College's Audit Committee of the Board of Trustees.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the *Code of Financial Ethics* must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code.

No Retaliation

No manager, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This *Policy for Reporting Possible Financial Misconduct* is intended to encourage and enable employees and others to raise serious concerns within the College prior to seeking resolution outside the College.
