

Whistleblower Policy

Approved 9 June 2007 by Kalamazoo College Board of Trustees

Every member of the Kalamazoo College community has a responsibility for the stewardship of College resources and the private support that enables it to pursue its mission. The College is committed to compliance with the laws and regulations to which it is subject. In addition, the College seeks to maintain policies and procedures that support the highest standards of honesty, openness and accountability.

The College's internal controls and operating procedures are intended to detect and to prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities. Intentional and unintentional violations of laws, regulations, policies and procedures may occur. The College has a responsibility to investigate and report to appropriate parties allegations of suspected improper activities and to report the actions taken by the College.

The Audit Subcommittee of the Board of Trustees shall address all reported concerns or complaints regarding College accounting practices, finances, internal controls or auditing. Relevant concerns may include, but are not limited to:

- Any misrepresentation of the true financial state of affairs of the College
- Financial irregularity, fraud, theft, corruption or bribery
- Failure to comply with a fiduciary obligation
- The deliberate concealment of any of the above

It is the responsibility of all College employees, students, parents, alumni, and other individuals to report violations or suspected violations in accordance with this "whistleblower policy." No individual who in good faith reports a violation or suspected violation shall suffer harassment, retaliation or adverse employment or academic or educational consequence.

Individuals wishing to report violations or suspected violations may do so by sending a sealed envelope addressed to the Chair of the Audit Subcommittee, Kalamazoo College Board of Trustees, c/o President's Office, 1200 Academy Street, Kalamazoo, MI 49006. Sealed envelopes will be delivered intact to the Chair of the Audit Subcommittee for evaluation. Reports of unlawful or unethical conduct should contain pertinent details to allow an appropriate inquiry into the matter to begin.

Anonymous reports will be handled in the same manner as signed reports. A file will be maintained by the Assistant Secretary of the Board for the purpose of documenting resolution to reported violations or suspected violations.