

Chapter Name: **Compensation and Fiscal Affairs**

Policy 5-22

Policy Title: **Financial Whistleblower Policy**

Date Approved: 10/09

Date Revised: 02/16

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5-22 Financial Whistleblower Policy

The College of The Albemarle is committed to facilitating open and honest communications relevant to its governance, finances, and compliance with all applicable laws and regulations. It is important that the College be apprised about unlawful or improper behavior including, but not limited to, any of the following conduct:

- theft;
- fraud;
- financial reporting that is intentionally misleading or in error;
- improper or undocumented financial transactions;
- improper destruction of records;
- improper use of College assets;
- violations of the COA's conflict-of-interest policy; and
- any other improper misrepresentation or false statements made by management regarding cash, financial procedures, or reporting

We request the assistance of every employee who has a reasonable belief or suspicion about any improper transaction. The College values this input and each employee should feel free to raise issues of concern, in good faith, without the fear of retaliation. Employees will not be disciplined, lose their jobs, or be retaliated against for asking questions or voicing concerns about conduct of this sort.

We encourage any employee who has a concern regarding an action concerning the College's governance, finances, or compliance with all applicable laws and regulations to raise the concern with a supervisor, the President, the chair of the Board of Trustees or any other Board member.

If for any reason the employee does not believe these channels of communication are adequate or safe, the concern should be reported immediately to Mr. John Leidy. Mr. Leidy has been retained to be an independent agent to collect any such reports and to assure that they are looked into and that corrective action is taken when appropriate. Anonymous reports or phone calls will also be accepted, and all reporting will be handled on a confidential basis.

His contact information is:

Hornthal, Riley, Ellis & Maland, L.L.P.

ATTN: John Leidy

301 East Main Street

Elizabeth City, NC 27909

(252) 335-0871

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Mark envelope:

"TO BE OPENED BY ADDRESSEE ONLY: PERSONAL AND CONFIDENTIAL"

Mr. Leidy and designated members of the Board of Trustees will coordinate the investigation and the College will then take appropriate action as it deems justified by the circumstances.