



Whistleblower Protection Policy

The USC Educational Foundation requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the USC Educational Foundation must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the USC Educational Foundation can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of the USC Educational Foundation's code of ethics or suspected violations of law or regulations that govern the USC Educational Foundation's operations.

No Retaliation

It is contrary to the values of the USC Educational Foundation for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the USC Educational Foundation. 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.

Reporting Procedures

The USC Educational Foundation has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If someone is not comfortable speaking with their supervisor or is not satisfied with their supervisor's response, they are encouraged to speak with the USC Educational Foundation's President & CEO or the USC Educational Foundation's Governance Committee. Concerns and complaints involving the President & CEO should be directed to the Governance Committee. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the President & CEO or the Governance Committee, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the President & CEO.

Accounting and Auditing Matters

The USC Educational Foundation's President & CEO shall immediately notify the Governance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The USC Educational Foundation's President & CEO or Governance Committee will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Policy Oversight

This Whistleblower Policy is intended for the administrative convenience of the Board of Directors and has been approved by the Board of Directors. The Board of Directors has the authority and discretion to interpret, amend, modify, and/or terminate this Whistleblower Policy. This Whistleblower Policy does not create, nor should it be viewed as creating a contractual obligation between the Foundation and any members of the governing body, officers, volunteers, employees, or other persons.

Policy adopted: April 24, 2024

Source: Significant portions of this Policy were adopted from the National Council of Nonprofits (2023).