

**INDIAN HILLS COMMUNITY COLLEGE FOUNDATION, INC.**  
Whistleblower Protection Policy

**General**

The Code of Ethics (Code) of the Indian Hills Community College Foundation, Inc., (the Foundation) for Board members and staff members, approved on March 12, 2009, requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Foundation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. The Whistleblower Protection Policy is being implemented to comply with the 2008 IRS Form 990 entitled *Return of Organization Exempt from Income Tax*.

**Reporting Responsibility**

It is the responsibility of all directors, officers, and employees to comply with the Code and to report violations or suspected violations in accordance with the Whistleblower Protection Policy.

**No Retaliation**

No director, 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 Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Foundation prior to seeking resolution outside the Foundation.

**Reporting Violations**

The Code addresses the Foundation's open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with anyone in management whom you are comfortable in approaching.

Supervisors and managers are required to report suspected violations of the Code of Conduct to the Foundation's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. The Foundation's Compliance Officer is the Indian Hills Community College Dean of Human Resources.

If a complainant suspects fraud or is not satisfied or uncomfortable with following the Foundation's open-door policy, the individual should contact the Foundation's Compliance Officer directly.

## Compliance Officer

The Foundation's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his/her discretion, shall advise the Executive Director and/or the audit committee. The audit committee shall consist of the president of the Foundation and two members of the Board of Directors elected by said Board at its annual meeting. The Compliance Officer has direct access to the audit committee of the Board of Directors and is required to report to the audit committee at least annually on compliance activity.

## Accounting and Auditing Matters

The audit committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

## Acting in Good Faith

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

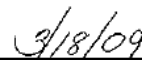
Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## Handling of Reported Violations

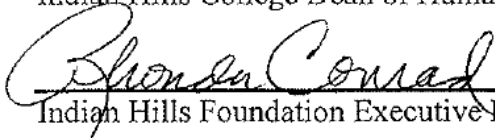
The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation



Indian Hills College Dean of Human Resources/Compliance Officer



Date



Indian Hills Foundation Executive Director



Date