

3.3 WHISTLEBLOWER PROTECTION FOR STAFF EMPLOYEES

PAU has a responsibility for the stewardship of resources and the public and private support that enables it to pursue its mission. It is the intent of PAU to adhere to all laws and regulations that apply to the organization, and to observe high standards of business and personal ethics. However, intentional and unintentional violations of laws, regulations, policies, and procedures may occur, and the purpose of these guidelines is to describe the procedure for reporting and investigating suspected improper activities, as well as to protect employees from retaliation for raising such issues. It is the responsibility of all directors, officers, and employees of PAU to comply with all relevant laws and regulations and to report violations or suspected violations in accordance with this policy.

3.3.1 No Retaliation. PAU and its employees will not retaliate against any director, officer, or employee who has in good faith disclosed or threatened to disclose any activity, policy, or practice of PAU that is a violation or apparent violation of law or of PAU's policy. Employees of PAU will not interfere with the right of someone to make a protected disclosure. Any employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to, and including, termination of employment.

3.3.2 Reporting Violations. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within PAU prior to seeking resolution outside the organization. Employees are encouraged to share their concerns, suggestions, and 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 the Equal Employment Opportunity Officer, the Vice President for Academic Affairs, or the President. In the case of a retaliation or perceived retaliation, employees are encouraged to contact the Equal Employment Opportunity Officer, the Vice President for Academic Affairs, or the President.

3.3.3 Compliance Officer. All reports of violations of policy may also be instead reported to the Compliance Officer, who is the chair of the Audit Committee of the Board of Trustees. The Compliance Officer is responsible for conducting an assessment of the complaint and keeping the Board informed of investigations. The Compliance Officer will also be responsible for dealing with cases of retaliation or suspected retaliation.

3.3.4 Handling of Reported Violations. All reports of violations will be kept confidential to the fullest extent possible, unless the identity must be shared in order to conduct the investigation. Any report of a violation or suspected violation will be acknowledged and promptly assessed. If allegations have been verified or substantiated by the investigation, corrective action will be taken.