

Baton Rouge Community College Foundation (BRCCF)

Whistleblower Policy

General

The Baton Rouge Community College Foundation ("Foundation") Code of Conduct (Code) 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.

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 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 BRCCF prior to seeking resolution outside the Foundation.

Reporting Violations

The Code addresses BRCCF'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 someone in the Human Resources Department or anyone in management with 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. For suspected fraud, or when you are not satisfied or uncomfortable with following BRCCF's open door policy, individuals should contact the Foundation's Compliance Officer directly.

Compliance Officer

BRCCF's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the Executive Director and/or the audit committee. 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. The Foundation's Compliance Officer is the President of the Board of Directors.

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 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

BATON ROUGE COMMUNITY COLLEGE FOUNDATION

Executive Summary

The heightened focus on nonprofit accountability in recent years has spurred calls for foundations and public charities to have adequate policies and procedures in place to ensure sound governance. In order for the Baton Rouge Community College Foundation to be fully compliant with the new Form 990 requirements, a Whistleblower Policy needs to be adopted.

Resolution

It is recommended that the Board of Directors of the Baton Rouge Community College Foundation adopt the following motion:

NOW, THEREFORE LET IT BE RESOLVED that the Board of Directors of the Baton Rouge Community College Foundation hereby approve and implement the Whistleblower Policy.

Chairman

Date