ARMSTRONG STATE UNIVERSITY

Reporting Wrongdoing

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<tr>
<th>Functional Area: President’s Office</th>
<th>Number: TBD</th>
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<td>Applies To: All Faculty, Staff and Students</td>
<td>Date First Issued: July 2010</td>
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<td>Policy Reference(s): Armstrong’s Harassment Policy; Board of Regents’ Policy, Section 8.2.20: University System of Georgia Ethics Policy; Board of Regents’ Business Procedures Manual, Section 16.4: Reporting Wrongdoing</td>
<td>Date Last Reviewed: March 22, 2016</td>
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Responsible Person

The Internal Auditor is responsible for maintenance of this policy, and for responding to questions posed regarding this policy.

Purpose / Rationale

Armstrong State University is committed to the highest standards of excellence, integrity and accountability throughout all of its operations, and recognizes that an ethical, efficient and effective work environment is essential. Armstrong has always placed a high priority on ensuring that each member of the university community has the opportunity and means to convey any matter than could compromise that environment. Armstrong both expects and requires its employees to report suspected wrongdoing on the part of any University employee or member of the University community.

This policy and the related procedures for the reporting, investigation, and resolution of wrongdoing are established as an integral part of Armstrong’s efforts to ensure that faculty and staff conduct themselves in accordance with high ethical standards, and that actions taken with respect to these matters are consistently applied.

Definitions

The following definitions are provided solely for purposes of this policy:

Wrongdoing – Fraud, waste, abuse, or violation of University or Board of Regents policies, state or federal law, or ethical or professional codes of conduct, to include harassment, academic misconduct or sexual misconduct.
Fraud – An act of intentional or reckless deceit to mislead or deceive. Examples include, but are not limited to, the following:
  - Fraudulent travel reimbursement.
  - Falsifying financial records or payroll information to cover up theft.
  - Intentionally misrepresenting the costs of goods or services provided.
  - Conducting a business on university time for personal gain.

Waste – A reckless or grossly negligent act that causes funds to be spent in a manner that was not authorized or represents significant inefficiency and unneeded expense, whether intentional or unintentional. Examples include, but are not limited to, the following:
  - Purchase of unneeded supplies or equipment.
  - Purchase of goods at inflated prices.
  - Failure to reuse major resources or reduce waste generation.

Abuse – The intentional, wrongful, or improper use or destruction of university resources, or seriously improper activity that does not involve prosecutable fraud. Examples include, but are not limited to, the following:
  - Improper hiring practices.
  - Significant use of university time for personal business or unauthorized time away from work.
  - Receipt of favors for awarding contracts to vendors.
  - Falsification of time records to include misuse of overtime or compensatory time.
  - Misuse of funds, equipment, supplies and/or other materials.

Corruption – An intentional act of fraud, waste or abuse or the use of one’s position for personal, pecuniary gain for oneself or another. Examples include, but are not limited to, the following:
  - Accepting kickbacks.
  - Bid rigging.
  - Contract steering.

Conflict of Interest – A situation in which a person is in a position to exploit his/her professional capacity in some way for personal benefit, which may occur when a person has completing professional obligations and private interests. A conflict of interest may exist even if no unethical or improper act results from it, as it may be evidenced by the appearance of impropriety. Examples include, but are not limited to, the following:
  - Purchasing goods from vendors who are controlled by or who employ relatives.
  - Nepotism.
  - Accepting gifts from vendors.
  - Outside employment with vendors.
  - Inappropriately using one’s position to influence the selection of vendors with whom one has a personal interest or relationship.
  - Using confidential information for personal profit or to assist outside organizations.
Retaliation – Any action or behavior that is designed to punish an individual for reporting wrongdoing, cooperating in an investigation, participating in a grievance or appeal procedure, or otherwise objecting to conduct that is unlawful, unethical, or violates policy. Examples include, but are not limited to, the following:

- Dismissal from employment.
- Demotion, suspension, transfer, or reassignment.
- Denial of salary, benefits, or leave.
- Denial of promotion or renewal that otherwise would have been received.

Policy

All suspected or known acts of wrongdoing committed by employees shall be reported to appropriate avenues for reporting, as described below.

Related Procedures

How Should Incidents Be Reported?

Events presenting an immediate threat to life or property or that are obvious criminal acts should be reported to University Police. An employee with any other concerns regarding possible unethical behavior or noncompliance with University or Board of Regents policy should discuss these concerns with his or her supervisor, department head, or any other University personnel with whom he or she feels comfortable. Additional reporting avenues have been and continue to be readily available, including, but not limited to, the following offices:

- Human Resources
- Equity, Diversity, and Inclusion
- Internal Audit
- Legal Affairs

Notification to any of these offices can be made at any time without fear of retaliation.

If an employee is uncomfortable speaking directly with any of the University personnel mentioned above, he or she can voice his or her concerns anonymously. Armstrong, in conjunction with the University System of Georgia (USG), has retained the services of NAVEX Global, a third-party hotline provider. This service allows anyone to communicate concerns via telephone or internet report at any time. All information will remain confidential.

**Toll-free phone number:** 877-516-3417  
**Link to reporting via internet:** https://armstrong.alertline.com/gcs/welcome

How Will Reported Incidents Be Handled?

A triage committee has been established to handle investigations into allegations of improper activity. The committee is comprised of the Vice President of Business and Finance, the Internal Auditor, and University Counsel. If an employee reports suspected improper activity to his or her supervisor, the supervisor should forward these reports to the triage committee, who will perform all investigations. The supervisor should not confront the individual under suspicion or initiate in-depth investigations on
his or her own, as such actions could compromise any ensuing investigation.

All University employees are required to cooperate fully with those individuals performing investigations. While an investigation is pending, the committee will determine if it is necessary to take immediate personnel and administrative action to protect University faculty, staff, students, and property.

Once the investigation is complete, the committee will take appropriate actions to minimize the likelihood of recurrence. **Employees are subject to disciplinary action, up to and including dismissal, as a result of participation in or commission of any fraudulent act.**

Administrators at all levels of management are responsible for preventing and detecting irregularities or improprieties. In addition, administrators are expected to recognize risks and exposures inherent in their area of responsibility and to be aware of indications of unacceptable behavior. In order to establish and maintain proper internal controls that provide security and accountability for the resources, administrators should ensure that they and their staff members receive adequate management training for their level of responsibility.

Armstrong is required to report suspected employee wrongdoing in a timely manner to the USG Office of Internal Audit and Compliance. Additionally, violations of policies and procedures must be reported to the appropriate USG office. For example, incidents involving computer or network security breaches must be reported to the USG Office of Information Security, while incidents involving violation of environmental compliance requirements must be reported to the Office of Real Estate and Facilities Compliance & Operations Program.