

REED COLLEGE

WHISTLEBLOWER POLICY

Reed College ("Reed") strives to conduct all of its activities in a responsible, legal, and accountable manner. In furtherance of that goal, all employees of Reed are encouraged to report either orally or in writing to their immediate supervisor, or alternate line of authority as hereinafter described, all evidence of activity by a Reed department or employee that may constitute:

- financial fraud;
- unethical business conduct;
- a violation of state or federal law; or
- substantial and specific danger to the employee's or public's health and safety.

Any employee of Reed who in good faith reports such incidents as described above will be protected from threats of retaliation, discharge, or other types of discrimination, including, but not limited to, compensation or terms and conditions of employment that are directly related to the disclosure of such reports. In addition, no employee may be adversely affected because the employee refused to carry out a directive, which, in fact, constitutes fraud or is a violation of state or federal law.

Insofar as reasonably possible, the identity of the whistleblower will remain confidential. However, Reed reserves the right to disclose the identity of the whistleblower if, in Reed's absolute discretion, identity may have to be disclosed for the following reasons, among others: to conduct a thorough investigation, to comply with applicable laws and/or to provide accused individuals their legal rights of defense, and to respond to claims or complaints by or relating to the whistleblower.

Any employee who wants to report evidence of alleged improper activity as described above should contact his or her immediate supervisor, or the supervisor's manager. In instances where the employee, is uncomfortable for any reason addressing such concerns to their supervisor or the manager of such supervisor, or is not satisfied with the supervisor or manager's response, the employee may contact Edwin O. McFarlane, Vice President and Treasurer of Reed; John Kroger, President of Reed; Michelle Valintis, Director of Human Resources of Reed; or Margaret Hill Noto, Chair of Reed College Board of Trustee Audit Committee. The contact information for Mr. McFarlane, Mr. Kroger, Ms. Valintis, and Ms. Noto are provided below. Employees are encouraged to provide as much specific information as possible including names, dates, places, and events that took place, the employee's perception of why the incident(s) may be a violation, and what action the employee recommends be taken. Employees will receive a reply to their report within twenty business days or as soon as practicable thereafter.

CONTACTS:

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