

**East Carolina University Foundation, Inc.
East Carolina Real Estate Foundation, Inc.
and Green Town Properties, Inc.**

Whistleblower Policy

I. Purpose

The Whistleblower Policy of East Carolina University Foundation, Inc., East Carolina University Real Estate Foundation, Inc., and Green Town Properties, Inc. (collectively the “Foundation”): (1) encourages all Board members, staff, and volunteers, acting in good faith, to report suspected or actual occurrences of illegal, unethical, or inappropriate events; (2) specifies that the Foundation will protect the individual from retaliation; and (3) identifies where such information can be reported. East Carolina University employees assigned to the Foundation are covered by State Statutes and subject to East Carolina University policies.

II. Guidelines

A. Encouragement of Reporting

The Foundation encourages reports of suspected or actual occurrences of illegal, unethical, or inappropriate events, including illegal or improper conduct by the Foundation itself, by its leadership, or by others on its behalf. Appropriate subjects to be raised under this policy would include financial improprieties, accounting or audit matters, ethical violations, misappropriation or misuse of Foundation resources, or other similar illegal or improper practices or policies. Other subjects on which the Foundation has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via the Foundation’s human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to interfere with legitimate employment decisions.

B. Protection from Retaliation

The Foundation prohibits retaliation by or on behalf of the Foundation against individuals for making good faith disclosures under this policy or for participating in a review or investigation under this policy. This protection extends to those individuals whose allegations are made in good faith, but prove to be mistaken. The Foundation reserves the right to discipline individuals who report false

allegations that are both unsubstantiated and made with malice, or who otherwise abuse this policy. Individuals who self report their own misconduct are not afforded protection by this policy.

C. Where to Report

Complaints, reports, or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in sufficient detail the specific facts demonstrating the basis for the disclosure and should be directed to the Director of the University Internal Audit. The Foundation will conduct a prompt, discreet, and objective review or investigation. An investigation of unspecified improprieties or broad allegations will not be undertaken without verifiable evidentiary support.

It is the intent of the Foundation to take whatever action may be needed to prevent and correct activities that violate this policy and to protect individuals against false allegations of illegal or improper conduct.

Updated and approved by ECU Foundation, Inc., Executive Committee November 20, 2013
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