

**University of Florida Foundation, Inc. (UFF)
Whistleblower Protection**

Policy #: 1.04
Effective Date: March 2, 2018
Responsible Department: Legal

1. PURPOSE

To discourage illegal or unethical conduct, encourage employees to report possible wrongdoing, and protect reporting employees from retaliation or the fear of retaliation.

2. APPLICABILITY

All UFF and Advancement employees and operations.

3. POLICY

UFF is committed to the highest standards of legal and ethical conduct in its operations. Should any person know of, or have a reasonable suspicion about, illegal or unethical conduct or fraud in connection with the finances or any other aspect of the Foundation's operations, that person is expected to promptly report the conduct orally or in writing as set forth below. Such concerns may involve employees, members of the Board, consultants, vendors, contractors, or outside agencies. All credible allegations will be investigated in accordance with UFF and University policies.

Reports may be made to any of the following: Executive Vice President, Executive Director of Legal, Executive Director of Talent Management, or any other UFF officer or director. Alternatively, notification of an alleged wrongdoing may be made through the University's Office of Internal Audit Hotline Service at 1-877-556-5356 or www.compliance.ufl.edu.

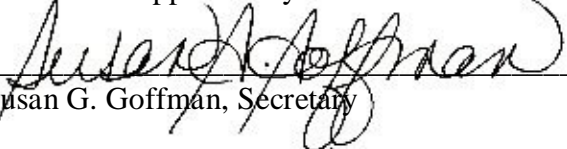
At all times respecting the privacy and reputation of individuals involved, the Executive Vice President (or the University President or Foundation legal counsel if the Executive Vice President is involved) and the Associate Vice President/COO shall be informed, as well as other appropriate members of senior management depending on the substance of the report. The Executive Director of Legal will maintain a confidential log of all reports and their disposition. If any material allegation is confirmed, the Executive Vice President (or Foundation legal counsel if the Executive Vice President is involved) shall inform the Chair of the UFF Audit Committee. A general report (not identifying any parties) of all complaints, investigations, and actions taken will be made annually to the Audit Committee in conjunction with the regular reporting on the internal audit.

No employee may interfere with the right of an individual to report fraud or misconduct and may not retaliate against another employee who has reported fraud or misconduct. There will be no punishment or other retaliation for the reporting of conduct pursuant to this policy. If the person providing the information requests anonymity, this request will be respected to the extent that doing so does not violate any law or impede any investigation.

4. **CLARIFICATION**

Requests for clarification of this policy should be sent to the Executive Director of Legal (sgoffman@uff.ufl.edu).

Certified as approved by the UFF Executive Board on March 2, 2018.



Susan G. Goffman, Secretary

Revision history: Original version
Revised February 25, 2009
Revised March 2, 2018