

**WHISTLEBLOWER POLICY – REPORTING SUSPECTED  
MISCONDUCT**

*Approved by Administrative Council 4/23/10; Renamed 6/25/18*

*Effective date 6/25/18*

Roseman University requires its employees, directors and officers to perform their duties and responsibilities in accordance with applicable laws and regulations, University policy and procedures and high ethical standards. The University is committed to compliance with all applicable laws and regulations through the promulgation and administration of policies that faithfully apply them. A culture of compliance strengthens and promotes ethical practices and respectful treatment of all members of the University community and those who conduct business with the University.

Each member of the University community shares responsibility for stewardship of University resources and compliance with applicable laws and policies. Therefore, University faculty, staff and students have a responsibility and are encouraged to submit a report in accordance with this Policy, describing in detail any conduct by University employees, directors, officers, students, or other parties that may result in financial loss or other harm to the University. The University shall thereupon have a duty to investigate.

This Policy is not intended to supplant, but rather to complement and supplement, existing University policies. It thus does not affect any rights, responsibilities or procedures set forth in other University policies addressing misconduct. For example, complaints or grievances regarding discrimination, sexual harassment, academic and disciplinary matters, academic freedom, and other matters as to which there are specific University policies, should ordinarily be made and addressed in accordance with the University policies applicable to such matters and applicable law.

Any employee who has a question about the propriety of any practice under University policies or procedures should ordinarily seek guidance from his or her supervisor, Unit Head, or from the Office of Human Resources.

Instances of suspected misconduct should be reported to the Director of Human Resources, except as follows:

<u>Person Suspected of Misconduct</u>	<u>Report Incident to</u>
Academic Program Directors, Deans, and University Vice Presidents.....	Director of Human Resources or University President
Director of Human Resources.....	President

University President and  
Chief Operating Officer/Treasurer.....Chair, Roseman University  
Board of Trustees  
c/o Ronald Reynolds, Attorney-at-Law  
823 Las Vegas Boulevard South, Suite 280  
Las Vegas, NV 89101  
(702) 445-7000

**IN THE EVENT THE REPORTING PERSON HAS A LEGITIMATE CONCERN WITH SUBMITTING THE REPORT AS DIRECTED ABOVE, THE REPORT MAY BE SUBMITTED TO THE CHAIR OF THE BOARD OF TRUSTEES, C/O RONALD REYNOLDS, ATTORNEY-AT-LAW, AT THE ADDRESS AND TELEPHONE NUMBER LISTED ABOVE.**

A Reporting Person may request that a report made under this Policy be handled as confidentially as possible under the circumstances. Although the University will endeavor to handle all such reports with discretion and due regard for privacy, other obligations and considerations may preclude the University from maintaining confidentiality in all circumstances. No individual who in good faith reports a violation or suspected violation shall there by suffer harassment, retaliation or adverse employment and/or academic or educational consequence. An employee who retaliates against someone who has made a report in good faith under this Policy is subject to disciplinary action, up to and including dismissal from the University. Individuals who believe they have suffered retaliation may report it to one of the reporting venues identified above.

This policy is intended to encourage and enable those in the University Community to raise serious concerns within the University prior to seeking outside resolution. Reports made in bad faith or with knowledge of their falsity may subject individuals to disciplinary or other appropriate action. Making a report under this Policy shall not insulate an individual from personnel or other actions that are warranted based on performance or other factors and are not caused by the making of a complaint under this Policy.