

Simmons College

Reporting of Suspected Financial Impropriety

Effective Date: July 2016

Application

This Policy applies to all Simmons College Trustees, Overseers, officers, faculty, staff members, and students charged with responsibility for College assets (all and any of whom will be referred to, for purposes of this Policy, as "Simmons Representatives.")

Purpose

In compliance with Simmons College's policies and practices, Simmons Representatives must observe high standards of organizational and personal ethics in the conduct of their duties and responsibilities, particularly when dealing with the College's finances. Simmons Representatives are expected to practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations. To the extent that a Simmons Representative has a good faith concern about a possible financial impropriety at Simmons, the College has adopted this policy to encourage and facilitate reporting of such concerns. The following are examples of activities about which a Simmons Representative should make a report:

- Questionable accounting, internal accounting controls, auditing and financial reporting matters;
- Misappropriation and/or misuse of Simmons funds, intellectual property or other assets;
- Failure to comply with legal and/or regulatory requirements involving the assets of the College; Violation or suspected violation of Simmons's policies on Conflicts of Interest (available in the "Simmons College Employee Handbook;" <http://internal.simmons.edu/faculty-staff/general-information/employee-information>)
- Any other suspected financial irregularity involving the College.

Scope

This Policy does not govern complaints about human resources concerns. Those complaints should continue to be reported to your supervisor or the College's Office of Talent and Human Capital Strategy.

Procedures

When a Simmons Representative uncovers or becomes aware of an instance of suspected or documented financial impropriety as noted above, he or she should report such conduct promptly. The preferred method for making this report is through the College's third-party vendor, EthicsPoint at <http://www.simmonscollege.ethicspoint.com> or 1-800-260-5947. Simmons College has engaged EthicsPoint to provide a simple way for Simmons Representatives to anonymously and confidentially report financial irregularities. Written reports also may be sent directly to the Chair of the College's Audit Committee or to the College's General Counsel. The Contact Information section below provides reporting addresses.

Persons making reports may, but are not required to, provide their names. EthicsPoint will not ask for a reporter's name or other identifying information. Reports submitted to EthicsPoint will be forwarded to the Chair of the College's Audit Committee.

When a report is received, the Chair of the College's Audit Committee or his/her designee, working with Trustees, management and outside counsel or auditors, as considered necessary, shall determine the appropriate actions to be taken. The Chair of the College's Audit Committee also shall notify, as appropriate, other College officials with a "need to know," provided that such notification will not compromise any investigation of the matter.

Any person who is the subject of an investigation shall be notified of its existence within a reasonable time and will be permitted to respond to the allegations, unless such notification would interfere with the investigation, recovery of College assets, or possible criminal prosecution.

As soon as practicable under the circumstances, the Chair of the Audit Committee shall issue a report to the Executive Committee of the Board of Trustees regarding any complaints made pursuant to this Policy as well as the result of any investigations of such complaints. The report shall include a summary of findings and a recommendation for any action deemed appropriate. Where disciplinary action is recommended, such action shall be consistent with the Employee, Faculty, or Student handbooks, other applicable policies, and the Bylaws of Simmons College. Any recommendation for discipline is to be made in consultation with the Vice President Talent and Human Capital Strategy and is a faculty member, the Provost. If the accused is a student, the Dean of Student Life will be consulted.

Confidentiality

Reporting and investigation of suspected financial irregularities must be handled by all parties in a confidential manner to the fullest extent practicable. If a person charged with responsibility under this policy is suspected of wrongdoing, that person shall be excluded from participating in the processes detailed above.

Protections to Persons Reporting Suspected Irregularities and Fraud

Persons reporting suspected financial irregularities in good faith or otherwise seeking guidance on dealing with such matters shall not be subject to discipline, reprisal, retaliation or other adverse action.

Law Enforcement Activities by the Department of Public Safety

This policy shall not be construed as placing limits upon the Department of Public Safety's traditional on-campus law enforcement role.

Claims of Unlawful Harassment or Discrimination

Claims of unlawful harassment or discrimination should be reported to the Manager of Employee Relations & Benefits in the College's Office of Talent and Human Capital Strategy.

Contact Information

EthicsPoint

www.ethicspoint.com

1-888-260-5947

Please note that if you wish to remain anonymous, you must file your claim via the EthicsPoint website or hotline.

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