



Whistleblower Policy of Randolph Community College Foundation Inc.

Randolph Community College Foundation, Inc. (the "Foundation") exists to serve its charitable mission and purposes. The Foundation's assets and activities must be directed toward the accomplishment of educational and charitable purposes, and not diverted or manipulated to serve private interests. To these ends, the Board of Directors adopts this Whistleblower Policy in order to encourage and empower the Foundation's directors, officers, employees, and volunteers to report misuse, inappropriate allocation or diversion of the Foundation's charitable resources, including, but not be limited to, the following:

- Theft;
- Unauthorized reimbursement of personal expenses;
- Misallocation of federal, state or philanthropic grant proceeds (i.e., use for a purpose other than as stated in the grant agreement);
- Financial reporting that is knowingly or intentionally misleading;
- Improper or undocumented financial transactions;
- Improper destruction of records;
- Improper use, including unauthorized or undocumented personal use, of assets;
- Any other improper occurrence regarding cash, financial procedures, or reporting;
- Violations of the Foundation's Conflict of Interest policy; and
- Any other violations of the Foundation's policies and procedures or federal, state or local law,

each, a "Misuse."

Obligation to Report

Actual, suspected, or threatened Misuses shall be promptly reported to the Executive Director or her/his designee, or in the case of a report concerning the Executive Director, to the President of the Board of Directors (each a "Responsible Officer"). If the person making the report (the "Whistleblower") so requests, the Whistleblower's identity shall be kept confidential. Furthermore, a Whistleblower may submit a report anonymously, in writing. Anonymity will be maintained to the extent possible. However, the Whistleblower should be aware that, in some instances, preserving anonymity could make it more difficult to investigate the report and ensure appropriate resolution of the reported Misuse.

The Responsible Officer shall take the following steps:

1. Take appropriate action to investigate the reported Misuse;
2. If, after such investigation, the Responsible Officer reaches the conclusion that no Misuse has occurred, the Responsible Officer shall forward a final written report to the Board of Directors and meet with the Whistleblower (unless the report was made anonymously) for the purpose of providing a copy of the Responsible Officer's report and discussing the report, including decisions regarding the report and recommended resolutions;

3. Any reported Misuse that is believed to be credible and does not exceed \$1,000 may be resolved by the Executive Director, with a report to the Board of Directors as outlined in Section 2 above; and
4. Any reported Misuse that is believed to be credible and exceeds \$1,000 shall be forwarded to the Board of Directors. The Board of Directors shall afford the person accused of the Misuse an opportunity to defend the accusation in a proceeding that is fair and reasonable. Thereafter, the Board of Directors may further investigate the reported Misuse, as it deems appropriate.

The Board of Directors shall determine whether a Misuse has occurred, with an affirmative finding requiring a two-thirds majority vote of the disinterested directors. If the Board of Directors determines that a Misuse has occurred, it shall consider and take appropriate action which may include, but not be limited to: (a) requiring the return of any misappropriated assets or funds; (b) removal or dismissal of the person who committed the Misuse; and (c) reporting the Misuse to the appropriate legal and law-enforcement authorities.

No Retaliation

Every director, officer, employee, or volunteer who has a reasonable belief or suspicion that a Misuse has occurred should feel free to raise the concern, in good faith, without fear of retaliation. It shall be considered a violation of this Policy for any director, officer, employee, or volunteer to retaliate, encourage, or permit retaliation against a person for reporting an actual, suspected, or threatened Misuse. Employees will not be disciplined, demoted, terminated, or otherwise face retaliation for bringing concerns, in good faith, to the attention of the Foundation and providing the Foundation a reasonable opportunity to investigate and take appropriate action. Any director, officer, employee, or volunteer who engages in retaliation will be subject to disciplinary action, which may include, but not be limited to, removal and/or dismissal. Reports of retaliation should be made pursuant to the reporting procedures of this Policy.

This Policy is intended to be used in good faith and in a judicious manner. Reports that are not made in good faith, or are otherwise made for purposes of harassing or annoying another party, may result in disciplinary action.

Contact Information

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**ACKNOWLEDGMENT OF RECEIPT OF
WHISTLEBLOWER POLICY OF
RANDOLPH COMMUNITY COLLEGE FOUNDATION, INC.**

To: Board of Directors, Randolph Community College Foundation, Inc.

I, the undersigned, associated with the above-captioned foundation (hereinafter the "Foundation") in a capacity of director, officer, employee, or volunteer represent that as of the date specified below, I have received and reviewed a copy of the Whistleblower Policy of the Foundation. In accordance with the Whistleblower Policy, I understand that the Foundation's assets and activities must be directed toward the accomplishment of educational and charitable purposes, and not diverted or manipulated to serve private interests. Furthermore, I understand that the Foundation has adopted this Whistleblower Policy in order to encourage and empower me to report misuse, inappropriate allocation or diversion of the Foundation's charitable resources.

I declare that I will report misuse, inappropriate allocation or diversion of the Foundation's charitable resources in accordance with this Whistleblower Policy. Furthermore, I declare that I will not retaliate, encourage, or permit retaliation against a person for reporting an actual, suspected, or threatened misuse, inappropriate allocation or diversion of the Foundation's charitable resources.

Signed: _____

Printed Name: _____

Dated: _____