

III. REPORTING

of fraudulent, illegal or improper activity, or does not otherwise allege a violation of this Policy, the Responsible Administrator will advise the reporter that no further action will be taken. If the report does contain sufficient credible information and an investigation is warranted, the Responsible Administrator shall refer the report for investigation and shall notify the Office of General Counsel.

If circumstances warrant, the Chancellor, President, the VSC Chief Financial & Operating Officer, or the Chair of the Audit Committee, in consultation with General Counsel or with outside counsel, shall notify appropriate external authorities (such as law enforcement, federal granting agencies, the NCAA, etc.) of the allegations.

Effective August 8, 2017: In responding to allegations of suspected fraudulent, illegal or improper activities where the allegations involve any misuse of federal grant funds, VSC will comply with appropriate federal requirements, as described in Appendix B to these Procedures.

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IX. RECORD-KEEPING

All records of reports, anonymous or not, including any investigations and subsequent actions, shall be retained in accordance with the schedule set forth in VSC Policy 209: *Records Retention* governing student records, personnel records, financial records, and legal records, as applicable.

Effective October 3, 2023.

Signed by:



Sophie Zdatny, Chancellor

Appendix A to VSC Policy 211:

- x By dialing the toll-free EthicsPoint phone number: 1-866-215-4016. Phone lines are open 24/7 and multilingual operators are available.

4. Where do the reports go? Who is notified about reports?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint will notify the Chair of the Audit Committee of the Board of Trustees, the Chancellor, General Counsel, and Associate General Counsel of all reports filed with EthicsPoint. In addition, EthicsPoint will notify the VSC Chief Financial & Operating Officer of any reports involving alleged financial irregularities and the VSC Director of Human Resources of any reports alleging employment (in)2 a t. 11

7. What if a reporter does not want to be anonymous?

There is a section in the report allowing reporters to identify themselves if they wish.

8. What if a reporter is not sure whether something he or she has seen or heard is a violation of VSC policy or involves unethical conduct?

If in doubt, file a report. EthicsPoint can help a reporter to prepare and file a report so it can be properly understood. The VSC would prefer that a situation that turns out to be harmless be reported rather than let possible unethical behavior go unchecked. Reporters may have useful knowledge of an activity that could be a cause for concern. Early reporting may minimize the potential negative impact of the suspected activity on the VSC, its students, and employees.

9. What happens after a report has been filed with the EthicsPoint hotline?

Typically, a reporter will receive confirmation within 2-3 business days that the Office of the Chancellor has received the report and that it will be reviewed. Then the Office of the Chancellor will make a preliminary evaluation of the report. If further investigation is merited, the Office of the Chancellor will appoint an investigator or, if appropriate, refer the report to a member institution for further handling.

institution's chief business officer. If the incident of suspected fraud, abuse, or criminal conduct occurs within the Office of the Chancellor