



SNU Policy: Whistleblower Policy

SNU Policy ID: Work Performance – E-6

Policy Reviewed by: Director of Human Resources

Approval Authority: Vice President for Business and Finance

Approval Date: September 21, 2026

Next Review Date: September 21, 2031

POLICY: The purpose of this whistleblower policy is to provide procedures for reporting unlawful or fraudulent activities and to protect Southern Nazarene University trustees, administrators, faculty and staff who make such reports. Southern Nazarene University requires its trustees, administrators, faculty and staff to observe a high standard of personal, business, and academic ethics. In observing those high ethical standards, all SNU personnel associated with SNU must act with honesty and integrity in carrying out their duties and responsibilities to ensure compliance with all applicable federal, state and local laws and regulations.

PROCEDURE:

Reporting

To ensure an impartial and independent process, individuals may also report concerns, unlawful or fraudulent activities, harassment, discrimination, or major policy violations directly through **Work Shield**, Southern Nazarene University's third-party reporting platform. Work Shield manages the intake and independent investigation of reports to recommend appropriate action without administrative interference from the University. You may file a confidential or anonymous Incident Report Form online at **snu.workshieldportal.com** or by calling the 24/7 toll-free hotline at **866-946-5558**. Please note that filing a formal Incident Report Form through Work Shield is required for claims to be officially investigated and resolved through this third-party system. Refer to All Encompassing Reporting, SNU Policy ID: General Information A-10 for more information on reporting incidences.

Nothing in this policy limits any right to report concerns to, communicate with, or participate in an investigation or proceeding conducted by a governmental, regulatory, or law-enforcement agency, or to engage in activity protected by applicable law.

No Retaliation

This policy is intended to encourage individuals to make reports of known or suspected unlawful or fraudulent activities. Any retaliation by SNU toward the initiator of any report made in good faith will not be tolerated. This includes harassment of any kind including threat of or action involving an adverse employment consequence. Any individual who retaliates against another individual as a result of a disclosure is subject to appropriate disciplinary action. Concerns about retaliation should be reported promptly through any reporting channel identified above.



Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law, regulation, or University policy. A person will not be disciplined merely because a good-faith report is unsubstantiated or mistaken. Any allegations that are knowingly false or made with reckless disregard for their truth or falsity may be viewed as a serious disciplinary offense.

Confidentiality

Reports of violations or suspected violations may be submitted on a confidential basis or anonymously. SNU will protect the confidentiality of the reporting person and investigation information to the extent reasonably practicable and permitted by law. The need to conduct an adequate investigation may require disclosure to certain persons.