



## University Policies and Procedures

<b>Policy Title:</b>	Code of Ethics and Whistleblower Protection Policy
<b>Policy Number:</b>	UPP-2020-03-18
<b>Replacing Policy:</b>	Code of Conduct & Business Ethics
<b>Date Approved:</b>	March 18, 2020
<b>Effective Date:</b>	March 18, 2020
<b>Date of Amendments:</b>	May 17, 2025
<b>Issuing Authority:</b>	Board of Trustees*
<b>Responsible Office:</b>	Vice President of Finance and Administration
<b>Related Policies:</b>	All Referenced Policies Herein

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### I. Reason for this Policy

University of Redlands prides itself on maintaining high ethical standards in all dealings with the business community, the public, the community, students, employees and alumni. In order to formalize the institution's commitment to these critical ethical standards and to allow for safe reporting of potential violations, the Board of Trustees has adopted the following Code of Ethics Policy and Whistleblower Protection Policy (formally referred to as Code of Conduct & Business Ethics).

This Code of Ethics Policy does not summarize all the University's policies. Every employee must also comply with all other policies set out in the Employee Handbook, Faculty Handbook and other policy documents, as appropriate.

### II. The Code of Ethics

- 1) **Individual Responsibility.** University of Redlands employees have an individual responsibility to deal ethically in all aspects of work and to comply fully with all laws, regulations, and University policies, standards of professional responsibility, and behavioral standards. Employees are expected to assume the responsibility for applying these standards of ethical conduct and for acquainting themselves with the various laws, regulations, and policies applicable to their assigned duties, including in the Faculty Handbook and the Employee Handbook. University administration, department heads, and others in supervisory positions must assume responsibility for ensuring that their conduct and the conduct of those they supervise complies with this Code. For any questions about the appropriate legal course of action, please request assistance from the Office of the General Counsel.<sup>1</sup> No one at the University of Redlands is authorized to instruct any other employee to engage in any illegal activities under any circumstances.

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\* Amended policy approved by the Audit & Risk Management Committee on March 18, 2025. Final Board of Trustees' approval was obtained at the May 2025 Board meetings.

<sup>1</sup> Please refer to the University's Policy on the Role of the Office of the General Counsel.



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- 2) **Confidentiality.** The University is entrusted with many kinds of confidential, proprietary, and private information regarding members of the Redlands community, the University, and its business dealings. It is imperative that those who have access to this information do not make any unauthorized disclosures of the information, either during or after employment.

Records containing personal data on employees and students are confidential. They are to be carefully safeguarded and kept current, relevant, and accurate. They should be disclosed only to authorized personnel having a “need to know” and in compliance with applicable University policies.<sup>2</sup>

- 3) **Honesty and Fairness.** University of Redlands expects from each of its employees honesty and fairness in dealing with others. Employees are expected to accept responsibility for their actions and to report information accurately to fellow employees and supervisors. Supervisors have a responsibility to set examples of honesty and fairness in their relationships with their employees.
- 4) **University Records.** All University records and other essential data must be prepared accurately. Preparing an intentionally false or misleading report or record of measurement is considered a serious offense and can result in discipline including termination.<sup>3</sup>
- 5) **Government Corrupt Practices.** Employees are strictly prohibited from giving governmental officials business gratuities or gifts. Employees should be aware that the U.S. government can and has imposed criminal sanctions on individuals and entities that have improperly given gifts to U.S. government personnel, and the promise, offer, or delivery to an official or employee of the U.S. government of a gift or other gratuity would not only violate our policies, but might also be a criminal offense.
- 6) **Anti-Competitive Behavior.** University of Redlands seeks to meet its goals honestly and fairly, and we seek advantages through superior performance, hard work, and intellectual skill. We believe that strong competition is the cornerstone of our economy and that unethical or illegal business practices have no part in this competition. We strive in all instances to deal fairly with our customers, suppliers, alumni, competitors, officers, employees, students and their families.<sup>4</sup>
- 7) **Research and Academic Integrity Policies.** Academic honesty stands at the center of intellectual pursuits in the academic community. Faculty and student scholarship in all

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<sup>2</sup> Please refer to the University’s Policy on Privacy of Education Records.

<sup>3</sup> Please refer to the University’s Policy on Governing Records, Retention and Destruction.

<sup>4</sup> Please refer to the University’s Antitrust Policy.



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forms, individual and collaborative, expresses our understanding and esteem for intellectual honesty. Nurturing and sustaining a climate of honesty are the responsibilities of every member of the community. The policy statement found in the Academic Catalog ([catalog.redlands.edu](http://catalog.redlands.edu)) includes standards of academic honesty, obligations and responsibilities of the members of the academic community for cultivating a climate of academic honesty, violations of academic honesty, and the procedures for addressing academic dishonesty.

- 8) **Reporting Requirements.** From time to time, the University of Redlands is required to report matters to public or government agencies.
- Depending upon their position, the University may ask an employee to provide information to ensure that our reports are complete, fair, and understandable. We expect employees to provide prompt, accurate answers to inquiries related to our public disclosure requirements.
  - All University accounts, financial reports, tax returns, expense reimbursements, time sheets, and other documents, including those submitted to government agencies, must be accurate, clear, and complete. All entries in University's records, including departmental accounts and individual expense reports, must accurately reflect each transaction. Our books, records, accounts, and financial statements must conform to generally accepted accounting principles, to applicable legal requirements, and to the University's system of internal controls. Any funds or assets under the University control must be recorded in the books of account. Additionally, records should always be retained or destroyed consistent with our current record retention practices.<sup>5</sup> In accordance with our policies, in the event of litigation or governmental investigation, please contact the Office of General Counsel immediately.
  - Our public reports should fairly and accurately reflect the state of our University. If employees believe they do not, employees have a responsibility to bring their concerns to the University's attention by reporting concerns as provided in this policy.

Due to the importance of this issue, the University requires every employee who has any concerns about the manner in which the University's financial statements or public reports are prepared, the sufficiency of its internal financial controls, the honesty or competence of its financial management or independent auditors to report the matter promptly as provided herein.

- 9) **Conflict of Interest.** Each employee should be sensitive to situations that could raise questions of potential or apparent conflicts between personal interests and the

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<sup>5</sup> Please refer to the University's policy on Governing Records, Retention and Destruction.



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University's interests. Conflicts of interest are handled in accordance with the University's Policy on Conflicts of Interest. If employees become aware of an unapproved conflict of interest on the part of anyone at the University, they must report it, as provided herein.

- 10) **Discrimination, Harassment, Sexual Misconduct, and Retaliation.** The University of Redlands does not unlawfully discriminate in its employment, enrollment, programs, or activities on the basis of age, color, race (including hair texture and protective hair styles), ethnicity, national origin, ancestry, sex, marital status (including domestic partner status), pregnancy and related conditions, sexual orientation, gender, gender identity or expression, physical or mental disability, genetic information, religion/creed (including religious dress and grooming practice), citizenship status (except to comply with legal requirements for employment), military/veteran status, status as a domestic violence victim, or any other characteristic protected by law.<sup>6</sup> Employees have a duty to uphold this Policy and to report suspected violations.<sup>7</sup>
- 11) **Use of University Resources.** Employees have a responsibility to use University resources, including time, materials, and equipment, for business purposes only. Employees may not use University property (such as grounds, buildings, office equipment and systems, tools, materials, assets, and facilities) for anything other than University purposes. University property shall not be sold, loaned, given away, intentionally damaged, destroyed, or otherwise disposed of, regardless of condition or value, without proper authorization. Copyright or otherwise licensed material (including books, articles, computer software programs and tapes) should not be infringed, and the University reserves all rights to its intellectual property.

University of Redlands is a nonprofit organization under the Internal Revenue Code, and as such it is not organized or operated for the benefit of private interests. No part of its net earnings may inure the benefit of any private individual.

Moreover, as a nonprofit, the University receives donations from a wide variety of individuals, corporations, and foundations. All University personnel have a responsibility to use such funds prudently, ethically, and for the purposes for which they are designated. In order to honor donors' intentions, and to protect the University's not-for-profit status, employees and student organizations using student activity fees and/or profits from University-related student-operated business may not:

- Make donations with University funds or assets to other nonprofit and/or charitable organizations;

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<sup>6</sup> Please refer to the University's [Notice of Nondiscrimination](#).

<sup>7</sup> Please refer to the University's Policy Prohibiting Discrimination, Harassment, Sexual Misconduct, and Retaliation.



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- Use University funds (from budgets, student fee allocations, “profits” from University-sponsored, student-operated businesses) for fund-raising purposes for other nonprofits/charities.

University of Redlands enthusiastically encourages its employees to directly support charities or non-profit organizations of their own choice. However, employees should not engage in fund-raising for other nonprofit and/or charitable organizations during working hours.

### III. Reporting Alleged Violations of the Code of Ethics or Other Illegal or Unethical Behavior

**Reporting Violations.** The University encourages complaints, reports, or inquiries about illegal or unethical practices or violations of the code of conduct, including illegal or improper conduct by the organization itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting, or audit matters, donations or grants mismanagement, contract noncompliance, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which the organization has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

If employees have any reason to believe that anyone connected with the University may have taken, or is about to take, any illegal or unethical behavior, or has otherwise violated this Code, they should promptly report. There are a variety of ways they can report suspected illegal or unethical behavior, or any other conduct required to be reported under this policy. They may report the matter to their supervisor, to any member of the President’s Cabinet, to the Office the General Counsel, or the University’s Confidential Reporting System, EthicsPoint at [www.redlands.edu/ethicsreporting](http://www.redlands.edu/ethicsreporting) or by calling (866) 384-4277. The EthicsPoint Confidential Reporting System will keep the name of the person reporting the potential issue confidential.

**No Retaliation.** This policy is intended to encourage trustees, employees and volunteers to raise concerns within the organization for investigation and appropriate action. With this goal in mind, no one who in good faith, reports a concern shall be subject to retaliation for making a report under this policy. Moreover, anyone who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination of employment. Retaliation is any adverse action taken against an individual because that individual has, in good faith: (1) personally complained of, or opposed, actual or perceived violations of this Code, other illegal or unethical conduct or other University policy; (2) testified, assisted, or participated in (or refused to participate in) a related investigation, proceeding, hearing, or legal action; or (3) exercised legal rights under a relevant statute, regulation, or policy that involves a protected characteristic. “Retaliation” also includes adverse actions or threats or other actions that are intended to, or



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would, dissuade a reasonable person from engaging in the above-protected activities, including indirectly encouraging retaliation on one's behalf.

**Response to Reports.** All reports will be forwarded to the appropriate personnel for review and, where appropriate, investigation. Where a process for review and investigation are applicable to a report already exist, they will be followed. The Office of the General Counsel will advise on the appropriate process where no procedure exists. The Administration will notify the Audit & Risk Management Committee of the Board of reports and investigations on a regular basis.

**Consequences for Violations.** Employees are responsible for ensuring that their own conduct and the conduct of anyone reporting to them fully comply with this Code and with the University of Redlands policies. Violations will result in the taking of appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the procedures applicable to faculty or staff, as the case may be. Conduct representing a violation of this Code may, in some circumstances, also subject employees to civil or criminal charges and penalties.

If employees are ever unsure about whether some action or situation would be consistent with this Code of Ethics, or if employees encounter a situation and they are unsure what to do, employees should discuss it with their supervisor or an appropriate officer of the University before taking further action.