

United Academics Whistleblower Protection Policy

The Sarbanes-Oxley Act of 2002 prohibits a company or organization from retaliating against “any person” who reports an actual or possible violation of federal law or regulation to federal law enforcement agencies. Accordingly, United Academics of the University of Oregon (“United Academics”) hereby implements the following whistleblower protection policy, which is intended to encourage and enable Executive Council members, officers, employees, and volunteers of United Academics (hereinafter, “United Academics representatives”) to raise serious concerns within the organization prior to seeking resolution outside United Academics.

United Academics requires Executive Council members, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of United Academics, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that United Academics can address and correct inappropriate conduct and actions. It is the responsibility of all United Academics representatives to report concerns about ethical violations or suspected violations of law or regulations that govern United Academics operations.

No Retaliation

It is contrary to the values of United Academics for anyone to retaliate against a United Academics representative who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of United Academics. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Accounting and Auditing Matters

The United Academics President shall immediately notify the Treasurer of any concerns or complaint regarding accounting practices, internal controls, or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written 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. Any allegations that prove not to be substantiated and which prove

to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The United Academics President will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation within one week. The Executive Vice President will work with the President of United Academics to ensure that all reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.