# LIBERTY UNIVERSITY

## The Compliance Program Charter

### MISSION

Liberty University is committed to the highest standards of ethical and lawful conduct in all academic and business activities. Established within the Ethics & Compliance division, the Office of Institutional Compliance is responsible for developing and monitoring the enforcement of an institution-wide compliance program. The Compliance Program has a clear mission to promote a culture of ethical behavior and compliance among all the members of the Liberty community in carrying out the University's mission with integrity and in accordance with our legal, regulatory, and ethical responsibilities.

### AUTHORITY

The Compliance Program, administered through the Office of Institutional Compliance, maintains independent oversight over the adequacy of compliance activities at the University. With stringent regard for information safekeeping and confidentiality, and subject to the applicable policies of this institution, the Office of Institutional Compliance will have access to all institutional activities, records, property, and employees as may be necessary to fulfill their responsibilities. The Senior Vice President ("SVP") for Ethics & Compliance, or their designee, is authorized to have full, free, and unrestricted access to all of the University's records, physical properties, and personnel pertinent to carrying out investigations and reviewing and monitoring compliance issues.

The Office of Institutional Compliance will seek advice from the Office of Legal Affairs to ensure institutional compliance with applicable federal, state, and local laws, and before accessing or disclosing University records protected by attorney-client privilege (e.g., communications between University attorneys and client representatives intended to seek, obtain, or provide legal advice) or attorney work product privilege.

Functional Compliance offices within the University retain authority and responsibility for administering their respective compliance functions and will participate in the Compliance Program as appropriate. Additionally, the Office of Internal Audit retains its authority and independence through a separate charter as approved by the Board of Trustees. Nothing in this Charter limits or alters Internal Audit's authority to audit the Office of Institutional Compliance, or the Compliance Program.

### INDEPENDENCE AND OBJECTIVITY

To ensure impartial and unbiased judgment, the Compliance Program will remain free from interference by any element in the University regarding matters of meeting compliance standards, including implementation of corrective actions and reporting of violations. The Office of Intuitional Compliance will conduct thorough and objective evaluations of Liberty's programs for compliance with relevant federal, state, and local laws. The SVP for Ethics & Compliance will regularly report the goals and standards of the compliance program to the President and Board of Trustees and will,

at a minimum, provide progress reports to the Audit Committee of the Board of Trustees on a bi-annual basis.

## RESPONSIBILITY

The Compliance Program, through the Office of Institutional Compliance, is responsible for activities that include, but are not limited to:

- Providing feedback on the University's strategic planning process, including short- and long-term compliance plan development, review, approval, implementation, and evaluation.
- Assisting with internal reviews to assess University compliance with applicable laws and regulations in coordination with other support departments like Internal Audit, the Strategic Analysis Team, Legal Affairs, and Risk Management.
- Assisting with targeted compliance reviews.
- Leading the University-wide compliance network, creating, and supporting the University Compliance Council, and maintaining a University Compliance matrix encompassing functional specialists throughout the University that oversee areas of compliance.
- Assisting institution-wide in researching and implementing new and existing policies and procedures related to regulatory compliance areas including but not limited to Title IV and state regulations.
- Assisting in mitigating risks the institution may incur by accurately recording and reporting on areas of compliance.
- Developing regular compliance reports, including official annual reports, related to areas of oversight.
- Ensuring the efficient use of University systems to support adequate recordkeeping related to compliance. Recommending solutions for adequate record maintenance and processes and ensuring the right policies and systems are in place to document compliance efforts and to provide related audit support.
- Recommending training for Liberty University departments related to areas of oversight and compliance.
- Coordinating the development, administration, and processing of the University's "climate assessment" in areas of oversight and subsequent implementation of recommended actions.
- Providing support to leadership advocating for regulatory reform impacting key areas of the University's operations, including Student Financial Services, State Approvals, Risk Management, Internal Audit, Title IX, and Athletics.

## ORGANIZATION AND COMPLIANCE PARTNERS

The SVP for Ethics & Compliance, serving as the Chief Compliance Officer, reports directly to the President of the University and provides leadership and oversight of the University's Compliance Program. The Office of Institutional Compliance administers the Compliance Program as described in the United States Sentencing Commission *Standards of an Effective Compliance and Ethics Program* and supports the SVP in compliance initiatives. Leadership within the Office of Institutional Compliance is accountable to the SVP for the effective implementation of the Compliance Program.

As all employees of the University share responsibility for maintaining an environment of accountability and integrity, the Office of Institutional Compliance will work with other

departments to create and implement a comprehensive compliance program. The Office of Institutional Compliance oversees the Compliance Council, which is comprised of compliance representatives with wide-ranging compliance touchpoints throughout the University. Members of the Compliance Council will be assigned by the President and/or Executive Leadership to ensure all areas of compliance are represented.

The Compliance Council is responsible for:

- Developing appropriate policies and procedures to meet compliance standards.
- Providing education to the University on compliance risks, as applicable to each department.
- Maintaining documentation related to compliance measures created and implemented.
- Recommending corrective action for areas not meeting compliance standards or ethical expectations.
- Submitting required reports as they pertain to compliance oversight and reporting of violations.

**PROFESSIONALISM**

The objective of the Compliance Program is to establish and promote an effective compliance and ethics program as outlined in the U.S. Sentencing Guidelines for administering an *Effective Compliance and Ethics Program*. The Office of Institutional Compliance will strive to follow the seven elements of an effective compliance program, outlined below, ensuring compliance standards and procedures are in place to prevent and detect criminal activity, and to promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

1. **Policies and Procedures**: Implementation of written policies, standards, and procedures that guide the organization's commitment to legal and ethical conduct. These documents shall define expectations, outline processes, and serve as the foundation for compliance activities. Ethics & Compliance, with advice from the Office of Legal Affairs, shall adopt policies and procedures designed to ensure Ethics & Compliance teams do not engage in the unauthorized practice of law.

2. **Oversight:** Compliance oversight will be fulfilled by the SVP for Ethics & Compliance, with periodic reporting responsibilities to the Chair of the Audit Committee and/or the Board of Trustees. This oversight will include assigning responsibility to individuals or committees to ensure compliance efforts are implemented effectively, and that issues are escalated and resolved appropriately. Individuals with operational responsibility within Ethics & Compliance will report matters relating to the compliance program to the SVP for Ethics & Compliance.

3. **Governance:** Due care will be given to creating an organizational structure that supports a culture of compliance. It will include roles, responsibilities, and accountability

mechanisms that ensure compliance is integrated into decision-making and operations across the institution. Additionally, the selection of personnel and the delegation of substantial discretionary authority will not include, to the best of our knowledge, individuals with a known history of illegal activities or other conduct inconsistent with an effective compliance and ethics program.

4. **Training and Awareness:** Employees and stakeholders will be educated about compliance policies, risks, and responsibilities. Targeted, ongoing training, and communication to build a culture of compliance and ethical behavior will be provided.

5. **Reporting, Auditing, and Monitoring:** Regular monitoring will be completed to ensure that compliance standards are being maintained and will involve mechanisms for detecting and preventing non-compliance. This will include internal reporting systems, regular audits, and continuous monitoring to identify risks, assess program effectiveness, and ensure corrective actions are taken.

6. **Enforcement:** Disciplinary actions and consequences for noncompliance will be consistently enforced in accordance with Liberty's Code of Business Conduct and student, faculty, and staff codes of conduct, as applicable.

7. **Response:** Efficiently address detected issues and prevent recurrence. This includes investigating concerns, implementing corrective actions, and updating policies or processes to mitigate future risks — including whistleblower protections and retaliation safeguards.

Additionally, Ethics & Compliance will work in conjunction with Human Resources to ensure employees maintain ethical standards as set forth in University policy through the Employee Handbook:

- Code of Business Conduct
- Conflict of Interest and Commitment
- University Ethics

## COMPLIANCE MATRIX FOR REPORTING AND MONITORING

The Office of Institutional Compliance maintains a tool, commonly referred to as a compliance matrix, which enhances centralized oversight in a decentralized environment. The matrix designates subject matter experts to serve as compliance partners who understand and report on specific regulatory issues that affect the operations of the University. The compliance matrix is used as a guide for consistent monitoring and will be reviewed and updated at least annually.

**Initial Approval Date:** 03/26/2024
**Date of Last Approval:** 09/25/2026
**Review Cycle: (Must be within three years of the date of last approval)**