

FINANCIAL REPORTING COMPLAINT AND WHISTLEBLOWER PROTECTION POLICY

It is the policy of Liberty University to encourage employees to report improper accounting, improper financial reporting or internal fraud that impacts the financial reporting function. This is further defined as concerns over questionable accounts or auditing matter, violations or any rule or regulation, or any provision of Federal and State law relating to fraud or non-compliance.

Employees who believe there have been questionable or improper acts regarding accounts or auditing manners or possible violations of any rule or regulation of Federal or State law, regulation or rule involving fraud shall contact the Chairperson of the Executive Committee. The Executive Committee is comprised of members of the Board of Trustees who are independent of management. This committee is charged, among its other duties and responsibilities, with receiving and handling inquiries and complaints of this nature from our employees. All matters reported to the Executive Committee shall be kept confidential and anonymous, unless and until the reporting individual authorizes otherwise.

This complaint procedure should only be used for the specific items listed above. All other matters, such as personal or customer issues, should be handled through a different channel.

All reports should be reported in writing to the Chairperson of the Liberty University Executive Committee of the Board of Trustees.

The University shall not discharge, demote, suspend, threaten, harass, or take any other adverse action against an employee in the terms and conditions of employment because of any lawful act of the employee in the terms and conditions of employment because of any lawful act of the employee to provide information, cause information to be provided, or otherwise assist in an investigation concerning (1) questionable or improper accounting or auditing matters that are reported to the Executive Committee; or (2) any conduct which the employee reasonable believes constitutes a violation of the Federal statutes governing mail fraud (18 USC 1341), wire fraud (18 USC 1343), or bank fraud (18 USC 1344).