



Georgia Tech Foundation

POLICY ON SUSPECTED FRAUD, MISCONDUCT AND DISHONESTY

Purpose

The purpose of this document is to communicate Georgia Tech Foundation (GTF) policy regarding the investigation of suspected fraud, misconduct or dishonesty by employees, officers, and trustees, and to provide specific instructions regarding appropriate action to report suspected violations.

Applicable Definitions

Fraud, Misconduct and Dishonesty:

Any conduct by an employee, officer or trustee that is in violation of GTF policy, in violation of local, state or federal laws, or inconsistent with ethical behavior. Examples of fraud, misconduct and dishonesty include, but are not limited to, the following:

- Theft or misappropriation of GTF assets.
- Misstatements and other irregularities in GTF records, including the intentional misstatement of results of operations.
- Forgery or alteration of documentation.
- Unlawful acts.
- Improperly benefiting from undisclosed conflicts of interest (see conflict of interest policy).

Responsibilities and Protections

- It is the responsibility and obligation of every GTF employee, officer and trustee to immediately report suspected fraud, misconduct or dishonesty directly to the GTF Chair.
- No employee, officer or trustee who, in good faith, reports a violation shall suffer harassment, retaliation or adverse employment consequences. An employee, officer or trustee who retaliates against any such individual is subject to discipline up to and including termination of employment.
- Likewise, anyone making allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be subject to disciplinary action.

Reporting Procedures and Investigation

Employees, officers and trustees must immediately report suspected violations to the GTF Chair. The individual must be acting in good faith when reporting a violation and must provide all details of the suspected fraud, misconduct or dishonesty. The individual also must make the report only to the Chair, and must take special care not to alert the individual suspected of the violation. The Chair is responsible for ensuring that any individual reporting a potential violation will not be subject to any adverse employee action. The Chair is also responsible for seeking advice from Foundation legal counsel as necessary.

The Chair will determine whether this matter should be brought to the attention of the board or executive committee. Having deemed that the incident potentially constitutes a violation, the Chair will then be responsible for follow up and investigation of the incident. Neither the existence nor the results of investigations will be disclosed or discussed with anyone other than those persons who have a legitimate need to know. The incident and any subsequent findings of the investigation will be reported to the board or executive committee, and further action in response to the violation, including disciplinary action, will be determined. A record of all complaints and investigations into potential violations will be kept on file by the office of the President.

Questions or Clarifications Related to This Policy

All questions or other clarifications of this policy and its related responsibilities should be addressed to the Chair, who shall be responsible for the administration, revision, interpretation and application of this policy.