Western Illinois University Foundation, Inc. Policy on Fraud

Policy#
Effective Date: 03/11/2015
Responsible

An employee who discovers or suspects fraudulent activity will contact the Internal Auditing Office immediately. If the suspect is a member of the Internal Auditing Office, the President and Ethics Officer/Legal Counsel will be notified. Independent auditors will investigate any allegations against Internal Auditing staff. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Investigations Team or Legal Counsel. No information concerning the status of an investigation will be given out. The proper response to any inquiries is, "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific references.

The reporting individual should be informed of the following:

• Do not contact the suspected individual in an effort to determine facts or demand restitution.
• Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to
do so by Legal Counsel or the Internal Auditing Office.

6. DISCIPLINARY ACTION

If warranted, disciplinary action as a result of an investigation may be recommended by the Internal Auditing Office. This could vary from written reprimand to time off without pay and, if warranted, a recommendation of termination and prosecution to the fullest extent of the law. The recommendation will be reviewed for approval by the designated representatives from Human Resources/the Provost Office,
Legal Counsel and, if necessary, by outside counsel, before any such action is taken. The Internal Auditing Office does not have the authority to implement the recommendation unless it relates to a specific employee within their office. The implementation for disciplinary action is made by the employee's management. Should the Internal Auditor believe the management decision inappropriate for the facts
presented, the facts will be presented to executive level management or the Audit Committee for a decision.

7. FRAUD RISK ASSESSMENT

Every year the Foundation Accounting Office will assess fraud risk relating to the Foundation. The risk assessment will be provided to external auditors on an annual basis, and it will identify areas of risk potential, indicate the probability or likely incidence of fraud, and quantify exposure to areas of risk. After analysis of those items, an overall estimate of risk on each area presented is determined.

8. ADMINISTRATION

The Foundation Accounting area under the direction of the Vice President for Advancement and Public
Services is responsible for the administration, revision, interpretation, and application of this policy. The
policy will be reviewed every three years and revised as needed.

Certified as approved by the Executive Committee of the Western Illinois University Foundation Board of Directors
on:

Date ~j,(/\ s-

Marlin France, Secretary

References:
5 ILCS 430- Ethics Act- Article I 0 -Gift ban

Review schedule: Every three years

Revision history: I 0/08