

Ethics and Integrity Hotline Policy
Effective 2023.11.01

I. Introduction

The Mission of the Universidad del Sagrado Corazón (“Sagrado” or “University”) is to educate persons in intellectual freedom and moral conscience who willing to engage in the construction of a more authentically Christian Puerto Rican society--a community of solidarity, in justice and peace.

We are guided by Christian principles and, as members of the Sagrado community, we have a shared responsibility to advance our mission by holding ourselves and other community members to the highest standards of ethical and lawful conduct in all our academic, student support, and institutional activities.

We must be aware of and follow the policies, standards, laws, and regulations that apply to our activities, report concerns, and work together to resolve them. We are responsible for our actions and our decisions not to act and be accountable to further the University's Mission.

II. Scope

The purpose of this policy is to encourage and promote members of the University Community and private individuals to report concerns about possible inappropriate conduct in good faith and confidentiality so that the University can address the situation and take appropriate actions. It also aims to protect from retaliation members of the University Community who, in good faith, provide information, cooperate, or participate in the evaluation or investigation conducted by Internal Audit in compliance with this policy.

This policy applies to all members of the University Community, including employees (faculty and administrative staff), students, trustees, and suppliers or representatives. The procedures outlined in this policy may be used by private individuals who wish to submit confidential disclosures or allegations of possible inappropriate conduct to Internal Audit for investigation.

III. Policy

Sagrado is committed to maintain the highest levels of ethic and integrity standards in its operations and relationships with employees and other organizations it does business with. It is the responsibility of all members of the University Community to maintain an environment characterized by high ethical behaviors and compliance policies and all applicable federal, state, and local laws and regulations.

The University encourages all community members to report unethical and inappropriate behavior, whether related to financial reporting, misappropriation of assets, conflicts of interest, retaliation, or other matters that may go against the policies and procedures of the Institution, including the Code of Ethics.

IV. Reporting Inappropriate Conduct

Members of the community are encouraged to report acts that they perceive in good faith, are or could constitute inappropriate conduct. To address these reports, the University established the appropriate reporting channels designed exclusively for these purposes. Details of the channels and related procedures are available to all members of the University Community on the University website (<https://politicassagrado.edu/wp-content/uploads/Formulario-de-Notificacion-de-Confidencias>) and portal (<https://mi.sagrado.edu/ICS/Confidencias/>).

When reporting inappropriate conduct, providing the most detailed information about the facts and submitting available evidence will facilitate the assessment or investigation and the determination of the course of action. It is expected that reporters and all persons involved in the evaluation and investigation will provide accurate and truthful information for the best interest of the Institution.

V. Evaluation

Internal Audit will assess the facts received and establish the processes or mechanisms it deems relevant and appropriate to carry out the corresponding evaluation and investigation, which may vary depending on the type of report submitted. This process is governed by the Ethics and Integrity Hotline Procedures.

VI. Anonymity and Confidentiality:

The information reported will be managed on a confidential and anonymous basis if the reporter choose. Whether by calling the toll free number or by accessing the web report online, the reporter will always have the right to remain anonymous. To the extent permitted by law and University policy, Sagrado will maintain and protect both individuals' privacy and the confidentiality of information stored in its information technology system and all other official repository.

If the contact information of the reporter is voluntarily provided, Internal Audit will keep it confidential unless authorized to disclose it by the reporter; such disclosure is necessary for the staff to carry out the appropriate assessment of the report, or not disclosing it would contravene a legislative, judicial, or administrative mandate.

Protection Against Retaliation

Sagrado prohibits retaliation against any person who reports, in good faith, possible inappropriate conduct, cooperates, or participates in the evaluation or investigation conducted by Internal Audit, in compliance with this policy. If it is demonstrated that retaliatory conduct has occurred, Sagrado will take measures that it deems appropriate and necessary at its discretion, including but not limited to disciplinary action that may include expulsion from the University (students); termination of employment relationship (employees); termination of contractual relationship (suppliers or representatives); and/or corresponding administrative or legal actions. If you believe you are being retaliated against, you can notify Internal Audit through the channels mentioned in this policy. The process related to retaliation concerns is governed by the Ethics and Integrity Hotline Procedures.

VII. Interpretation of this Policy

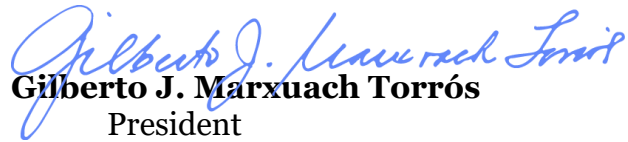
This Policy is approved by the President of the University with the advice and counsel of the office of the General Counsel. Questions about the scope and interpretation of this Policy should be directed to the Office of Internal Audit at 787.728.1515, ext. 5459, or by email at auditoriainterna@sagrado.edu.

If there is any ambiguity in any provision of this Policy, the University reserves the discretion to interpret it in accordance with the purpose for which it was established, the impact to the University's operations and good faith, unless otherwise provided by law.

VIII. Violations of this Policy

Any violation of this policy by a member of the University Community will lead Sagrado to take appropriate and necessary measures at its discretion, including but not limited to disciplinary action that may include expulsion from the University (students); termination of employment relationship (employees); termination of contractual relationship (suppliers or representatives); and/or corresponding administrative or legal actions.

Violations to this Policy should be directed to the office of Compliance, Internal Audit and Institutional Integrity at cumplimiento@sagrado.edu. Any violations to this Policy will be addressed in accordance with the University's policies and procedures.


Gilberto J. Marxuach Torrós
President

Definitions

The following terms and phrases will have the indicated meanings:

1. **Inappropriate conduct-** A broad, non-legal term that encompasses all actions, behaviors, or activities that are unethical, illegal, or impermissible, carried out by members of the University Community during the performance of their duties, responsibilities, and official obligations or on behalf of Sagrado.
2. **Retaliation-** A broad term that includes unjustified disciplinary actions, acts of punishment, threats, or discrimination for providing information about possible inappropriate conduct, refusing to engage in such possible inappropriate conduct, or collaborating with the investigation of possible inappropriate conduct.
3. **University Community** - is a broad term that includes any person or legal entity who has an interest in the University's Mission, institutional activities and/or operations (e.g., trustees, faculty, administrative staff, student support services staff, students, stakeholders, third-party, suppliers and vendors).
4. **Reporter-** is a person member of the University Community who submits a report or a concern through any of the communication channels and methods available at the Institution and as explained in the Ethics and Integrity Hotline Procedures.