

Yale University

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Date: February 2006
To: Yale Employees
From: Andrew Hamilton, Bruce Alexander
Subject: Yale University Fraud or Illegal Activity Hotline

Last year, Yale began operating a Fraud or Illegal Activity Hotline. As we begin the Hotline's second year of operation, we would like to reacquaint you with it and answer some frequently asked questions about its operation. The University takes compliance with laws, regulations, and University policy seriously, and has put this Hotline in place as an additional means of ensuring that suspected fraud and other illegal activity are brought to the attention of appropriate University officials, so it can be investigated and, when verified, appropriate action can be taken. Persons raising compliance issues in this way should be assured that University policy prohibits retaliation against those who make such complaints in good faith.

What is the Hotline phone number?

The toll-free Hotline phone number is: 1-866-358-3806.

Why does the University have a Fraud or Illegal Activity Hotline?

Yale University is committed to conducting business ethically and complying with applicable federal and state laws and regulations. The Yale University Standards of Business Conduct, introduced by President Levin in 2003, articulate the ethical and legal principles that govern business dealings by Yale faculty and staff. [<http://www.yale.edu/provost/html/standards.html>]

Typically, a possible violation of the Standards of Business Conduct is resolved by an employee's referring the concern to a supervisor or to a person of greater authority within the University's organizational structure. [<http://www.yale.edu/resources/pyramid.html>] Alternatively, an employee may choose to report an issue to a central University department such as Human Resources, General Counsel, Controller or University Auditing. [http://www.yale.edu/resources/call_list.pdf]

When these or other normal contacts are not successful in addressing an issue that an employee believes may involve fraud or illegal activity, or where an employee desires anonymity, the Fraud or Illegal Activity Hotline is available to the employee to bring the concern to the University's attention.

Again, any employee who brings an issue to the University's attention through the Hotline or otherwise should be aware that University policy prohibits retaliation against employees who in good faith report possible compliance issues.

What should I do if I suspect a violation of the Standards of Business Conduct?

- Review the Standards of Business Conduct and determine whether in your view there is a potential violation. [<http://www.yale.edu/provost/html/standards.html>]
- Bring the potential violation to the attention of a supervisor or administrator within your organization.
- If the supervisor or administrator is unable to address the issue to your satisfaction, refer the matter to the head of your organization (*e.g.*, chair, dean, director or divisional head).
- If the issue is not able to be resolved within your organization, contact an appropriate central University department. [http://www.yale.edu/resources/call_list.pdf]
- If you believe an issue concerning possible fraud or illegal activity remains unresolved after making the above contacts, or if for any other reason you'd prefer to use this option (*e.g.*, to preserve anonymity), call the Fraud or Illegal Activity Hotline at **866-358-3806**.

When should I call the Fraud or Illegal Activity Hotline?

Call the Fraud or Illegal Activity Hotline if other mechanisms are not successful in addressing an issue that you believe may involve fraud or illegal activity, or if you desire anonymity or for any other reason prefer to use the Hotline.

What happens when I call the Fraud or Illegal Activity Hotline?

The Fraud or Illegal Activity Hotline is answered by an independent, third-party vendor, not a University employee. When you call the Hotline, a trained Communication Specialist will gather information regarding the issue being reported. The vendor will then promptly forward a detailed report to University Auditing and the University's General Counsel, who will coordinate a review of the issue by the appropriate University officials. The University will investigate and take appropriate action regarding all issues reported to the Hotline.

Do I have to give my name when I call the Hotline?

No. If you wish to remain anonymous, the Communication Specialist will provide you with a unique report ID number, a PIN number, and a follow-up date. You will be asked to call the Hotline again on the follow-up date to receive any response or feedback from the University. (This enables communication between you and the University while maintaining your anonymity.) You are free to call the Hotline back at any time, however. If you provide the unique report ID number and PIN number that were assigned to you, you will be able to communicate additional information relevant to the reported issue.

Key characteristics of the University's Fraud or Illegal Activity Hotline

- The toll-free Hotline (**866-358-3806**) is available to University employees 24 hours a day, seven days a week, every day of the year.
- Calls to the Hotline are answered by a third-party vendor, not by a University employee.
- The employee may provide his or her name and contact information, or may choose to remain anonymous.
- To ensure confidentiality, calls to the Hotline are not recorded or traced.