BUSINESS ETHICS	
Policy Number: ADMIN-020	**Responsible Department: Finance-Administration [Vice President of Finance & Administration and Business Office]**
Effective Date: 04/28/2017	**Last Revision Date: 03/02/2017**

PURPOSE:

To facilitate CWI's commitment to oversight, strong internal controls and clear fiscal procedures in its business functions by providing guidance regarding CWI's expectations of its employees in the conduct of CWI's business.

SCOPE:

This policy applies to all administration and employees of CWI.

DEFINITIONS:

Conflict of Interest: Any official action or any decision or recommendation by a person acting in a capacity as a public official, the effect of which would be to the private pecuniary benefit of the person or a member of the person's household, or a business with which the person or a member of the person's household is associated.

Fraud: A false representation of a matter of fact, whether by words or by conduct, by false or misleading representations, or by concealment of what should have been disclosed, that deceives or is intended to deceive another so that the individual will act upon it to her or his legal injury.

POLICY

The purpose of CWI's business ethics policy is to provide guidance to its employees and departments in the conduct of business, both internally and with the general public. Ethics are the rules, standards, or code of conduct that govern our decisions on a daily basis. The business ethics policy establishes the proper environment of internal controls, fiscal responsibility and clear procedures so that CWI conducts its business functions in an ethical manner.

CWI requires all employees to act in accordance with all federal, state and local laws and regulations. Employees are expected to be of high moral character and utilize judgment to avoid the appearance of impropriety.

GUIDELINES

ETHICS OVERSIGHT

CWI shall maintain proper business policies and best practices to meet fiscal objectives in an ethical framework. Oversight shall include but not be limited to the following:

- CWI shall have adequate internal controls which will be periodically reviewed and updated.
- Fiscal objectives, procedures, and constraints shall be documented and communicated to the Board of Trustees and CWI employees.
- CWI shall maintain an enterprise resource management system (ERP) to provide accurate, reliable, timely fiscal data.
- CWI shall prepare and present statements and financial information pursuant to applicable law and generally accepted practices and guidelines.
- In order to maintain the public trust, CWI shall utilize a transparent and open format for all financial dealings.
- CWI shall provide a clear description of responsibility for all college staff who are responsible for fiscal management and maintaining records.
- CWI employees shall exercise prudence and integrity in the management of funds in their custody and in all financial transactions.
- CWI employees shall not knowingly sign, subscribe to, or permit the issuance of any statement or report which contains any misstatement or which omits any material fact.
- CWI employees shall not engage in any activity which may give rise to a conflict of interest.
- CWI employees shall actively avoid the appearance of impropriety or conflicts of interest.

FRAUD AND ABUSE

CWI's administration, employees and students are prohibited from engaging in any activities that may be considered to be fraudulent under federal, state or local law. Employees are required to report known or suspected fraudulent activity; including prohibited activity by vendors, contractors or consultants.

Violations of any of CWI's business procedures, or instances of fraud, misappropriation or fiscal irregularity by any employee will be brought to the immediate attention of the Administration. Examples of such violations include, but are not limited to the following:

- Taking college funds, securities, supplies, inventory, or other assets (including furniture, fixtures, equipment, intellectual property, private personal information, etc.).
- Forgery or alteration of documents (checks, time sheets, contractor agreements, purchase orders, reimbursement requests, other financial documents, or electronic files).
- Falsification or alteration of college financial statements or records.
- Improprieties in the handling or reporting of money or financial transactions.
- Authorizing or receiving payment for goods not received or services not performed.
- Authorizing or receiving payment for hours not worked.
- Making personal purchases with college funds.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment.
- Acceptance or seeking gifts or anything of material value in exchange for official college action.

- Directing another employee to perform an action that may be considered fraudulent.

External independent auditors may be brought in to investigate any issue at the discretion of the President or the Board. Interference with a review or investigation of ethics violation or fraud is prohibited and is also subject to disciplinary action. Interference includes, but is not limited to, failing to cooperate with auditors or investigators, and the destruction, alteration, or removal of documentation relating to the review or investigation.

ETHICS HOTLINE

Although employees reporting possible violations of this policy in good faith are protected by CWI's whistleblower policy, employees may choose to remain anonymous when making a report. Therefore, CWI has established a hotline to serve as an additional mechanism to report suspected compliance violations. (Ethics Hotline)

CWI takes all reports regarding ethics and compliance matters seriously and will investigate each report. Employees may submit a report about a compliance or ethics concern or ask for guidance related to a compliance or ethics matter. The information provided via CWI's Hotline may be relayed to CWI in a format that protects the employee's anonymity.

VIOLATIONS OF POLICY

Employees who violate this policy may be subject to disciplinary action up to and including termination and possible restitution.