THE CHINESE UNIVERSITY OF HONG KONG

Whistleblowing Policy

Scope of the Policy

1. The Chinese University of Hong Kong (**University**) strives to be a collegial and transparent institution which values the active participation of all Stakeholders of the University. The University is committed to achieving high ethical standards that comply with all applicable laws, rules and regulations. It is in the interest of the University to ensure that inappropriate behavior or institution malpractice that compromises the interests of its Stakeholders and the wider public does not occur.

2. In the interest of good governance, this Policy sets out the framework that enables Stakeholders of the University to report, in good faith and without fear of retribution, irregularities or misconduct occurring in the University to the Senior Management or the University Council, as the case may be, and the procedure for following up on any such report by the University. Such irregularities or misconduct should be non-trivial and could cause damage to the well-being of or bring disrepute to the University. In general, the whistleblowing framework is not intended to entertain issues that can be dealt with under the existing University mechanism governing dispute resolution, appeals or complaints on personnel or resource allocation matters.

3. This Policy applies to all units of the University and its joint ventures or companies over which the University has an effective control.

Interpretation

4. Questions on the scope or interpretation of this Policy can be raised with the Secretary of the University (who is also the Secretary of the University Council) on a confidential basis electronically via a dedicated email address (whistleblow@cuhk.edu.hk) or by letter c/o the University Secretary's Office, Room 109, University Administration Building, The Chinese University of Hong Kong.

Submission of Report in Writing with Name of the Whistleblower

5. Stakeholders, including current and former employees, students and other persons who deal with the University (e.g. business partners, contractors, suppliers, volunteers and visitors), may report in writing to the Chairman of the Audit and Risk Management Committee (**ARMC**) on a confidential basis, with a copy to the Secretary of ARMC, via dedicated e-mail addresses (whistle-report@cuhk.edu.hk). Reports made should contain as much specific information as possible and include any supporting evidence. Whistleblowing reports received elsewhere within the University should be forwarded immediately to the Chairman of ARMC, with a copy to the Secretary of ARMC, for handling under this Policy. All whistleblowing reports shall be handled in accordance with the established procedures of the University.

6. If the subject of the alleged irregularities involves a member of the Senior Management [1], the report should be referred to the Chairman of the University Council, who may consult the Senior Executive Affairs Committee for decision on whether, and if what, follow up actions should be taken.

7. To ensure the credibility and authenticity of the whistleblower's report, the report submitted should bear the name, title and contact details of the whistleblower. Also, the University may need to contact the whistleblower requesting additional information or providing updates on the progress of the follow up inquiry, if any. Normally, anonymous reports would not be entertained unless there are prima facie reasons to pursue them, e.g. seriousness of the alleged irregularities or sufficient details/evidence are provided to support the allegation(s) etc.

Protection and Good Faith

8. In the interest of enabling whistleblowing on irregularities or misconduct that would otherwise be suppressed, the University will endeavour to protect the identity of the whistleblower if he/she so wishes. Moreover, the University should advise the whistleblower if there will be follow-up actions and, where appropriate, keep him/her informed of the progress or the final outcome of the inquiry. However, it should be understood that:

   (a) where the University has reason to believe that some criminal element may be involved, it is obliged to report the case to the relevant law enforcement agency, which will decide whether or not an investigation is warranted. In some cases, the University may be asked not to pursue its own follow up inquiry in order not to impede the pending criminal investigations. In certain circumstances, the University may be prohibited by law to reveal to the whistleblower that the matter is being investigated by the law enforcement agency or any matter in relation to the whistleblowing report;

   (b) the University will endeavour to protect the identity of the whistleblower, but it may not be practical to ensure the follow up inquiry can be undertaken entirely on a covert basis as many parties, especially the person(s) who are the subjects of the alleged irregularities, are involved. Under certain circumstances, the identity of the whistleblower may need to be disclosed according to the applicable laws; and

   (c) while the University takes the Whistleblowing Policy seriously as it may help to uncover significant irregularities or misconduct that would otherwise be suppressed, the whistleblower must use this channel in good faith. Any attempts to abuse the system in the form of frivolous reports or with malicious intent are not acceptable and may result in legal or disciplinary liabilities.

Report to the Executive Committee of the Council

9. A summary report in tabular format containing the investigation findings and recommendations of all whistleblowing reports, which shall be fully anonymized to preserve confidentiality and protect the identities of all individuals involved, will be submitted biannually to the Executive Committee of the Council for information.

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[1] Senior Management is defined to include the Vice-Chancellor, Provost, Pro-Vice-Chancellors/Vice-Presidents, Associate Vice-Presidents, College Heads/Masters, Faculty Deans, Dean of the Graduate School, the Secretary, the Registrar, the Librarian, the Bursar and the University Dean of Students of the University.