

ETHICS AND WHISTLEBLOWER POLICY

Oral Roberts University (“ORU”) requires its trustees, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of ORU must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. The purpose of this Ethics and Whistleblower Policy is to foster an ethical and open work environment, to ensure that ORU has a governance and accountability structure that supports its mission, and to encourage and enable trustees, officers, employees and volunteers to raise serious concerns about the occurrence of any actual or suspected improper actions prior to seeking resolution outside of the University.

This Ethics and Whistleblower Policy is not an employment contract and does not modify the employment relationship between ORU and any of its officers or employees, nor does it change the fact that officers and employees of ORU are employed at-will. Nothing contained in this Ethic and Whistleblower Policy provides any trustee, officer, employee or volunteer of ORU with any additional rights or causes of action not otherwise available under applicable law.

Reporting Responsibility: All trustees, officers, employees and volunteers of ORU have a responsibility to report any knowledge or information of conduct or communications which are illegal, unethical or violate any adopted policy of ORU ("Report"). An individual submitting a Report must act in good faith, without malice to the organization or any individual in the organization and have reasonable grounds for believing that the information contained in the Report discloses conduct or communications in violation of these standards. A person who makes a Report does not have to prove that a violation has occurred. However, any Report made maliciously or without a reasonable basis will be viewed as a serious disciplinary offense.

No Retaliation: No one who submits a Report in good faith or who, in good faith, cooperates in the investigation of a Report shall suffer harassment, retaliation or any adverse employment consequence. Any individual, who retaliates against another individual because that person has submitted a Report or cooperated in the investigation of a Report, is subject to disciplinary action including termination of employment or volunteer status.

Reporting Process: All trustees, officers, employees, and volunteers should present a Report to any person within ORU who can properly address the identified issues. In most cases, the direct supervisor is the individual best suited to address the issues raised in the Report. However, if an individual is not comfortable disclosing a Report to their supervisor (i.e. the supervisor is the subject matter of the Report), Reports can be submitted to any individual within the supervisory line of authority. If submission of a Report through ORU’s management structure is not practical, a Report may also be submitted to ORU’s Human Resources Department, Dr. Karen Adams, the Chair of ORU’s Audit Committee or to any other Officer or Trustee of ORU.

Investigation: The individual receiving the Report shall take appropriate and necessary action to address and respond to the issues identified in the Report. In the event an individual receives a Report that involves fraud, theft, substantial and willful misconduct, illegal conduct or any other matter falling outside the scope of their supervisory responsibility, the individual should immediately contact the CFO, Neal Stenzel. The CFO is responsible for promptly

communicating the Report to the Audit Committee. Following the receipt of any Report, the Audit Committee will oversee an investigation into the matter and take any necessary remedial action. The Audit Committee may enlist committee members, ORU employees, general counsel, accounting or other advisors, as appropriate, to assist in any investigation.

Confidentiality: Reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The amount of contact between the individual submitting the Report and the body investigating the concern will depend on the nature of the issues and the clarity of information provided.

In order to assist ORU in the investigation and in addressing any issues, employees are encouraged to disclose their identity when making a Report. Reports may also be submitted anonymously, however, and will be subject to an appropriate investigation. The Audit Committee shall retain as a part of the records of the Committee any such Reports or concerns for a period of at least seven years.

Reportable Events: For purposes of this policy, reportable events of misconduct, dishonesty, and fraud include but are not limited to:

- Theft or other misappropriation of ORU assets
- Misstatements or other irregularities in ORU records
- Financial reporting that is inaccurate or intentionally misleading
- Misuse of ORU asset or resources
- Activities that are illegal or jeopardize ORU's tax-exempt status
- Forgery or alteration of documents or any other form of fraud
- Violation of ORU's conflict of interest policy