



THE CATHOLIC UNIVERSITY OF AMERICA
Compliance and Ethics Program

Washington, DC 20064

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COMPLIANCE AND ETHICS PROGRAM CHARTER

The mission of the University's *Compliance and Ethics Program* is to establish and maintain a centralized organizational structure that promotes a culture of ethical behavior, reduces the risk of non-compliance with laws, regulations, and University policies, and supports the University's mission. The University's Compliance Officer is responsible for the vision and execution of the *Compliance and Ethics Program* and will:

- Establish an Executive Compliance Committee consisting of senior officials that will provide regular guidance and input on the implementation of the *Compliance and Ethics Program*.
- Establish an Enterprise Risk Management Committee to coordinate the ongoing entity-wide assessment of all aspects of the risk environment and in the implementation of initiatives to mitigate risk.
- Assist compliance partners across the University in understanding and fulfilling their compliance responsibilities.
- Communicate and promote the University's Code of Conduct to the University community.
- Coordinate the development, review, and approval of University policies and communicate and promote those policies to the University community.
- Establish a mechanism for the University community to report compliance concerns anonymously and free from fear of retaliation. Establish a formal process for reviewing reports of potential non-compliance, overseeing corrective action for instances of non-compliance, and documenting outcomes.
- Implement a Compliance Awareness Training program to communicate key compliance risks to the University community, and to communicate and promote the *Compliance and Ethics Program* resources available to assist members of the University community in addressing those risks.
- Establish ongoing monitoring activities to identify emerging compliance risks, assess the effectiveness of controls to prevent and detect non-compliance, coordinate implementation of new controls and mitigations, and measure the effectiveness of the *Compliance and Ethics Program*.

The Compliance Officer reports to the Office of the President and to the Audit Committee of the Board of Trustees regarding the status of the *Compliance and Ethics Program* and ongoing compliance issues and initiatives.