Composition and Purpose
The University Executive Compliance Committee (ECC) is a standing committee at Princeton University chaired by the Executive Vice President. The ECC also includes the Vice President and Secretary, the General Counsel, the Vice President for Finance and Treasurer, the Vice President for Human Resources, the Vice President for Information Technology and Chief Information Officer, the Dean of the Faculty, the Chief Audit and Compliance Officer, the Dean for Research, and the Vice President for the Princeton Plasma Physics Laboratory.

The ECC is an integral component of the Institutional Compliance Program. The ECC assists the University in fulfilling its internal control, risk management and compliance oversight responsibilities and regularly reports to the University’s Trustee Committee on Audit and Compliance (ACC). The ECC may also complete tasks/functions as assigned by the ACC. The ACC may, without in any way compromising or inhibiting its independence, empower or otherwise direct the ECC, or individual members thereof, to assist the Committee on specific matters as it discharges its responsibilities.

Meetings and Reporting
The ECC meets regularly during the academic year, and shall meet as necessary during the summer. The ECC may invite members of University management, auditors, or others to attend meetings and provide pertinent information, as necessary. Meeting agendas are prepared and provided in advance to members, along with appropriate briefing materials. Minutes of the meetings are prepared, distributed, and approved by the ECC at the next ECC meeting.

The ECC reports to the ACC at its regularly scheduled meetings and on an ad hoc basis as issues arise that warrant its immediate attention. The ECC distributes a memorandum twice a year to the ACC in advance of its meetings to summarize the efforts addressed within the ECC throughout the year that were not previously reported to the ACC.

Responsibilities
The ECC has the following responsibilities:

- Assist the Chief Audit and Compliance Officer solicit audit and compliance ideas, determine priorities, review and comment on the annual internal audit and compliance work plan, review and comment on proposed approaches to audits and compliance monitoring, review and discuss results of completed audits and compliance projects,
and help ensure general follow up of recommendations in audit and compliance reports.

- Encourage University-wide cooperation and work to make sure that the importance/purpose of the audit and compliance functions and independence of the internal audit function are well publicized and understood throughout the University.

- Review and comment on broad institutional efforts or issues relating to institutional risk and compliance, and recommend and approve corresponding policy where appropriate.

- Discuss institutional barriers to compliance and identify appropriate response/corrective action.

- Review and discuss reports from the external auditors, including recommendations for enhancing internal controls and compliance mechanisms and adequacy of management action plans to mitigate the identified risks and follow up to ensure implementation.

- Review and discuss results of audits/reviews performed by regulatory agencies, and review any necessary corrective action.

- Receive, as appropriate, reports on compliance monitoring activities and/or regulatory proposals that have potential impact on University policies and procedures.

- Monitor and discuss reports, complaints, investigations, and similar inputs alleging acts or omissions that, if proven, would result in significant reputational harm, legal exposure, or monetary expense to the University. Such acts or omissions may include violations of laws and/or regulations, behavior that contravenes University ethical norms, or violations of University policies, and may be identified through audits, the University Hotline, the Office of the Dean of the Faculty, the Office of Human Resources, the Office of the General Counsel, and other University offices.

- Ensure that the cognizant University Committee or official takes appropriate disciplinary and corrective actions in response to proven misconduct and/or non-compliance, and in the absence of a University Committee or cognizant official, determine appropriate actions and ensure such actions are taken.