

Whistleblower Protection

Approved 5.21.2012

Purpose

The School's **Code of Ethics and Conduct** (hereinafter "Code") requires directors, officers, agents, volunteers, employees, and all other individuals involved with the School and its operations (hereinafter collectively referred to as "Staff") to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All Staff must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this **Whistleblower Protection Policy** (hereinafter "Policy").

No Retaliation

No member of the Staff, who in good faith reports a violation of the Code, shall suffer harassment, retaliation, or adverse employment consequence. Any Staff who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Policy is intended to encourage and enable Staff and others to raise serious concerns within the School prior to seeking resolution outside the School.

Reporting Violations

Per the School's **Open Door Policy**, as detailed in the **School Policy Manual**, the School has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the Staff member's supervisor is in the best position to address an area of concern. However, if a member of the Staff is not comfortable speaking with their supervisor or is not satisfied with their supervisor's response, they are encouraged to speak with the Director or anyone in management whom they are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Policy to the School's Director, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when Staff is uncomfortable or not satisfied with following the School's **Open Door Policy**, Staff should contact the School's Director directly.

No Staff or student may interfere with the good faith reporting of suspected or actual wrongful conduct. Should any individual attempt to do so, notify the Director immediately.

Compliance Officer

The School's Director holds the title of Compliance Officer. Thus, the Director is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Policy and, at their discretion, shall advise the Board of Trustees (hereinafter "Trustees"). The Director has direct access to the Trustees and is required to report to the Trustees at least annually on compliance activity.

Accounting and Auditing Matters

The Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Director shall immediately notify the Trustees of any such complaint and work with the Trustees until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Policy. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and the reporting party may be subject to: 1) disciplinary action up to and including immediate termination, and/or 2) all available legal action.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the reporting party or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Director will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.