

Academy 360 Whistleblower Protection Policy

- 1. **General:** This Whistleblower Protection Policy is intended to encourage and enable each of Academy 360's directors, officers, employees, volunteers, family and community members to raise concerns internally so that Academy 360 can investigate and take appropriate action. Academy 360 requires all directors, officers, employees, volunteers, family and community members to observe high standards of business and personal ethics in performing their responsibilities for the school. As representatives of Academy 360, we must practice honesty and integrity and comply with our charter contract and applicable laws and regulations.
- 2. **Reporting Responsibility:** As a director, officer, employee or volunteer of Academy 360, it is your obligation to report concerns about violations of Academy 360's code of conduct, charter contract, applicable laws or regulations or questionable or improper accounting or auditing practices. As a family or community member of Academy 360, you are encouraged to report concerns about violations of Academy 360's code of conduct, charter contract, applicable laws or regulations or questionable or improper accounting or auditing practices.
- 3. **No Retaliation:** No director, officer, employee, volunteer, family and community members who, in good faith, reports a concern or suspected violation will be subject to retaliation. Any director, officer, employee, volunteer, family or community member who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination of employment or service with Academy 360.
- 4. **Reporting Procedure:** Academy 360 has an open door policy. Academy 360 encourages reporting any concerns about violations of Academy 360's code of conduct or charter contract, illegal or improper conduct, questionable accounting or any other ethical or compliance concerns. Employees, volunteers, family or community members should share their concerns with their immediate supervisor. If you are not comfortable speaking with your immediate supervisor, are not satisfied with your supervisor's response or your supervisor is a subject of your concerns, you are encouraged to discuss your concerns with the Director of Wellness and Operations, Principal or Executive Director. The Director of Wellness and Operations and the Principal are required to report complaints or concerns about suspected ethical, legal, accounting or financial violations to the Board President. Concerns or complaints, may also be reported directly to the Board President instead of school leadership. Any report or compliant of

suspected fraud or improper accounting or financial practices must be promptly reported to the Board President. The Board President is responsible for investigating and making appropriate recommendations to the board for all concerns reported to the Board President. The name and email address of the Board President are posted at http://academy-360.org/who-we-are/board-members/.

- 5. **Acting in Good Faith:** Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to be unsubstantiated or have been made maliciously or knowing to be false will be viewed as a serious disciplinary offense.
- 6. **Confidentiality:** Reports and investigations of concerns will be kept confidential to the extent possible, subject to Academy 360's need to conduct an adequate investigation and resolve the complaint.
- 7. **Handling of Reported Violations:** All reported concerns will be promptly investigated by Academy 360. Appropriate corrective action will be taken by Academy 360 if warranted by the investigation.