



Trinity-Pawling School

The Board of Trustees adopted the following policy as a means to further safeguard the assets of the School. It is posted here on the website so that alumni who make contributions to the School can feel confident that their gift is being administered as intended. This policy allows for individuals (employees and vendors) to report inappropriate activity in the following areas: accounting, financial, fraud, theft, donor stewardship, discrimination or harassment, and other activity that may damage the public trust.

Policy On Reporting Possible Financial Misconduct And/or Illegal Activities

Under the provisions of the Sarbanes Oxley Act of 2002, business organizations must adopt a policy whereby there is a mechanism for an employee to report illegal or fraudulent activities without fear of reprisal. Whereas this provision is not mandatory for Not-For-Profit organizations, Trinity-Pawling School wishes to operate in a legal, ethical manner and concurs with this provision of the law. Trustees, administrators, teachers, all other employees, and volunteers of Trinity-Pawling School are expected to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

This policy is intended to encourage and enable each trustee, administrator, teacher, employee, and volunteer of the school to report concerns about illegal or dishonest activity or other misconduct involving the school's financial or business affairs. Such activity may include but is not limited to:

- Fraud or deliberate misrepresentation in the preparation, review or audit of the school's financial statements;
- Fraud or deliberate misrepresentation in the recording and maintaining of financial records of the school;
- Deficiencies in or noncompliance with the school's internal accounting controls;
- Misrepresentation or false statement regarding a matter contained in the financial records, financial reports, or audit reports of the school;
- Theft or flagrant misuse of the school's funds or other assets.

Any trustee, employee, or volunteer who, in good faith, reports a concern shall not be subject to adverse employment consequences or retaliation. An individual with knowledge or concern about illegal or dishonest financial misconduct is encouraged to communicate such concern to his/her immediate supervisor, to the Headmaster of the school, the Business Manager, the Chair of the Audit Committee, or the President of the Board of Trustees. If an individual wishes to address his/her concerns via email, they may do so by sending it to the Chair of the Audit Committee at auditchair@trinitypawling.org. Emails sent to this address go directly to the Chair of the Audit Committee and will not be accessible accessed by Trinity-Pawling staff.

Concerns may be made either verbally or in writing. In order to permit a thorough and complete investigation of the charge, the letter and report must contain as much specific information as possible as to the time, date, and nature of the reported activity, but need not be signed by the employee. Reports of concerns shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

All reports will be promptly investigated by, or under the direction of, the Audit Committee, and appropriate corrective action will be recommended to the Board of Trustees, if warranted by the investigation.

The Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Anyone reporting a concern must act in good faith and have reasonable grounds for suspicion of illegal or dishonest financial activity. Allegations that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false will be viewed as a serious disciplinary offense and may result in disciplinary actions, up to and including termination of employment or dismissal. Disclosure of reports of concerns to individuals not involved in the investigation will also be viewed as a serious disciplinary offense.

President of the Board of Trustees

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