

FLINTRIDGE PREPARATORY SCHOOL WHISTLEBLOWER POLICY

Flintridge Preparatory School (the “School”) is committed to the highest standards of financial reporting and lawful and ethical behavior. Additionally, the School is committed to full compliance with all applicable state and federal statutes, rules and regulations by all School representatives, including Administrators, all other employees, and members of the Board of Trustees (the “Board”).

Reporting

All Administrators, other employees, Board members, volunteers, or other representatives of the School have an obligation to report misconduct in accordance with this Whistleblower Policy. For the purpose of this Policy, misconduct includes, but is not limited to, engaging in conduct with the intention of causing damage to the material interest of the School, or otherwise failing to practice honesty and integrity or to act ethically. See Appendix A for a full list of conduct that constitutes misconduct for the purpose of this Policy.

Should any person know or have a reasonable, good faith belief that persons associated with the School plan to engage or have engaged in misconduct as defined above, that person should immediately report his or her concerns (the “Complaint”) pursuant to the following guidelines:

1. The individual shall make the Complaint to the Head of School. Subsequently, the individual shall also report to the anonymous Suspicious Activities, Abuse, Fraud, Ethics Violations (SAFE) Hotline (dial 855-662-7233 or visit safehotline.com and include Flintridge Preparatory School’s company code: 7084408360). If the individual believes the Head of School would have a conflict of interest with respect to the subject of the Complaint or the Complaint pertains to alleged conduct by the Head of School, then the individual may make the Complaint to the Chair of the Board. If the Complaint pertains to alleged conduct by the Chair of the Board as well, the individual may make the Complaint to the Chair of the Audit and Risk Committee.
2. Upon receipt of a Complaint, the Head of School shall immediately apprise the Chair of the Board or the Chair of the Audit and Risk Committee of the Complaint and respond to the individual filing the Complaint. The Head of School shall also conduct an initial screening of the Complaint to assess its nature, legitimacy and significance. If in the course of the Head of School’s initial screening or at any time thereafter, it appears that the Complaint may implicate the Head of School, he or she shall notify the Chair of the Board or the Chair of the Audit and Risk Committee of the Board of that fact, and the Chair of the Board and/or the Chair of the Audit and Risk Committee of the Board shall determine whether the Head may continue with the initial screening or any subsequent investigation or appoint another person(s) to assume the initial screening or any subsequent investigation instead.
3. The Head of School (or the Chair of the Board or Chair of the Audit and Risk Committee, if applicable) shall report all Complaints (and their resolution, if applicable) to the Executive Committee of the Board at the Executive Committee’s next regularly scheduled or specially called meeting. The Executive Committee shall

advise the Board of the Complaint, as appropriate, except to Board members who may be the subject of the Complaint. The Executive Committee shall determine whether it is necessary to conduct a further investigation. If the Executive Committee determines that an investigation is necessary, the Head of School (or the Chair of the Board of Trustees and/or the Chair of the Audit and Risk Committee of the Board, in the event of a conflict) and the Director of Human Resources, as appropriate, shall be responsible for coordinating the investigation.

4. In conducting any investigation, the School will strive to respect any person's request for confidentiality and/or anonymity and to keep the identity of other complainants as confidential as possible, consistent with the need to conduct a thorough review and investigation. All records of Complaints and subsequent investigations shall be maintained in a confidential manner for at least seven years following the final disposition of the matter.
5. The School will take appropriate action in response to any Complaints, including, but not limited to, disciplinary action (up to and including termination) against any person who, in the Head of School's or the Board's assessment, has engaged in misconduct as defined above. Such misconduct shall be reported to the relevant civil or criminal authorities as may be required by law and/or in the School's discretion.

No Retaliation

Individuals acting in good faith who submit a Complaint pursuant to this Policy, or to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant, will be protected from retaliation or, if employed by the School, an adverse employment action such as discharge, compensation decreases, or poor work assignments and threats of physical harm. Likewise, individuals will be protected from retaliation for providing information regarding a Complaint in good faith to, or otherwise assisting in any investigation regarding a Complaint conducted by, the School, law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant.

An individual who has made a Complaint or who provided information regarding a Complaint and who subsequently believes he or she has been subjected to retaliation should immediately report it to the Head of School, the Chair of the Board, or the Chair of the Audit and Risk Committee.

Complaints that are proven to have been made maliciously or with knowledge of falsity will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination.

Posting of this Policy

This Policy will be posted in the School's office, on its website and shall be provided to all employees upon commencement of their employment with the School. The name and contact information of the Head of School, Chair of the Board and the Chair of the Audit and Risk Committee shall accompany the posting or giving of this Policy.

APPENDIX A

The following conduct constitutes “misconduct” for the purpose of the Flintridge Preparatory School Whistleblower Policy.

S - Suspicious Activities

Anti-Social Behavior	Identity Theft
Bullying	Misuse of Company Property
Character Assassination	Security of Personal Property
Defamation, Libel or Slander	Suspicious Activities
Gaslighting	Whispering Campaign

A - Abuse

Abuse of Authority and/or Power	Humiliation
Abuse of Information	Intimidation
Abuse of Trust	Sexual Harassment
Abusive Supervision	Drug Abuse
Alcohol Abuse	Taunting / Threats
Cyber Abuse or Cyber Bullying	Verbal Abuse

F - Fraud

Accounting Errors or Misrepresentations	Misappropriation of Assets
Accounting Omissions	Sabotage
Bribery	Corruption
Embezzlement	Theft
Falsification of Documents	Kickbacks

E - Ethics Violations

Conflict of Interest or Self-Dealing	Misconduct
Discrimination	Prejudice
Privacy and HIPAA Compliance	Unfair Labor Practices
Violation of Law	Unsafe Working Conditions
Violence	Vandalism

Source: safeline.com