

**OXNARD UNION HIGH SCHOOL
DISTRICT RETIREE HEALTH BENEFITS TRUST
Whistleblower Policy**

Oxnard Union High School District Retiree Health Benefits Trust (the "Trust") expects the members of its Board of Trustees and service providers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities on behalf of the Trust.

The objective of this Policy is to establish policies and procedures for:

- The submission of concerns regarding violations of federal or state law, its Trust agreement, or questionable accounting or auditing matters by employees, Board members, or Trust service providers, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the Board as described in the preceding paragraph.
- Protection from retaliatory actions against individuals who report concerns to the Trust or its third party administrator.

I. Definitions

"Improper Conduct" shall mean any conduct that is in violation of proper accounting or auditing procedures, state or federal law, the Trust Agreement or Trust Policies.

"Concern" shall mean a reasonable belief that a Trustee or other individual authorized to act on behalf of the Trust may have engaged in Improper Conduct.

"Trust Agreement or Fund Policies" shall mean the Agreement and Declaration of Trust or similar document establishing the Trust, as may be amended from time to time and any policies, interpretations, rules or regulations adopted by the Board of Trustees.

II. Reporting Responsibility

Each Trustee and any individual engaged by the Board on behalf of the Trust is expected to report all Concerns of Improper Conduct.

All reported Concerns will be forwarded to the Chair of the Board of Trustees. In all instances where this policy requires reporting to the Chair, if the Chair is involved in the Concern, then the Concern is to be reported to the Co-Chair or Trust Counsel. If both the Chair and Co-Chair of the Board are involved, the Concern shall be reported to Trust counsel.

The Board shall be responsible for hiring a neutral third-party investigator to make appropriate

recommendations with respect to all reported Concerns. The Board shall ensure that the individual (or individuals) appointed to investigate are not involved in the conduct giving rise to the reported Concern.

III. No Retaliation

This Policy is intended to encourage the raising of Concerns for investigation and appropriate action. No one who in good faith reports a Concern shall be subject to retaliation.

IV. Procedure for Reporting Concern

Concerns not requiring immediate corrective action should be submitted in writing to the Chair or Co-Chair for consideration at the next regularly scheduled meeting of the Board of Trustees. Alternatively, the Concern may be raised orally provided it is reported in the minutes of the meeting of the Board of Trustees.

V. Investigation of Reported Concerns

All non-frivolous reports will be promptly investigated by neutral third-party investigator hired by the Board. The investigator will make recommendations to the Board at the conclusion of the investigation. The Board has the authority to request advice of legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations. At the conclusion of the investigation a brief written report will be provided to the Board.

VI. Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for the Concern. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious offense and grounds for termination of contract with a service provider or request to the appointing authority for removal of a Trustee.

VII. Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and grounds for termination of contract with a service provider or request to the appointing authority for removal of a Trustee.