WHISTLEBLOWER PROTECTION POLICY

Application
This Whistleblower Protection Policy applies to all of Our Lady of Good Counsel High School, Inc.'s ("Good Counsel" or "School") staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and directors, each of whom shall be entitled to protection.

Good Counsel requires its employees and representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Good Counsel, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility
This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Good Counsel can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Good Counsel's code of ethics or suspected violations of law or regulations that govern Good Counsel's operations. A protected person shall be encouraged to report information relating to illegal practices or violations of policies of Good Counsel (a "Violation") that such person in good faith has reasonable cause to believe is credible.

No Retaliation
It is contrary to the values of Good Counsel for anyone to take action against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Good Counsel. No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this Policy. Any individual within Good Counsel who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

Reporting Procedure
Good Counsel has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the President. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to Good Counsel's President, who has the responsibility to investigate promptly all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the President.

Information shall be reported to the President, unless the report relates to the President, in which case the report shall be made to the Chair of the Board of Directors who shall be responsible to provide an alternative procedure.

Compliance Officer
The School's Compliance Officer is the President. The Compliance Officer will advise the Chair of the Board of Directors of all complaints and their resolution.

Accounting and Auditing Matters
Good Counsel's President shall immediately notify the Audit Committee/Finance Committee of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved. The President will report in writing at least annually to the Board's Executive Committees on compliance activity relating to accounting or alleged financial improprieties.

Confidentiality
Good Counsel encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted anonymously by: 1) completing an online form at the website www.olgchs.org/whistleblower; or 2) mailing a Whistleblower Report Form (available at www.olgchs.org/whistleblower) in an envelope marked "Confidential" to: John Ciccone, Compliance Officer for Whistleblower Matters, Our Lady of Good Counsel High School, 17301 Old Vic Blvd., Olney, MD 20832. Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable Good Counsel or law enforcement to conduct an adequate investigation.

Dissemination and Implementation of Policy
This Policy shall be disseminated in writing to all affected constituencies. Good Counsel shall adopt procedures for implementation of this Policy, which include:

(1) Documenting reported Violations;
(2) Working with legal counsel to decide whether the reported Violation requires review by the Compliance Officer or should be directed to another person or department;
(3) Keeping the Board of Directors informed of the progress of the investigation;
(4) Interviewing employees;
(5) Requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate the complaint; and
(6) Preparing a written record of the reported violation and its disposition, to be retained for a specified period of time.

The procedures for implementation of this Policy shall include a process for communicating with a complainant about the status of the complaint, to the extent that the complainant's identity is disclosed, and to the extent consistent with any privacy or confidentiality limitations.

WHISTLEBLOWER REPORT FORM

INSTRUCTIONS:

Our Lady of Good Counsel High School , Inc. ("OLGCHS") accepts and investigates allegations of improper violations of OLGCHS's code of ethics or suspected violations of laws or regulations that govern OLGCHS operations ("Violations") by OLGCHS employees or where OLGCHS is potentially a victim of wrongdoing.

OLGCHS Policy on Reporting and Investigating Allegations of Violations is located at: www.olgchs.org/whistleblower.

Because we do not undertake investigations without adequate cause, we need as much evidence as possible to corroborate the allegation(s) such as documents, witnesses, and other specific and relevant information. Investigating Violations is more difficult if complaints are filed anonymously because of the difficulty of obtaining evidence to corroborate the alleged improper activity before we begin an investigation. If you choose to file your complaint anonymously, be sure to provide specific and relevant information including the first and last names of any individuals mentioned, their contact information, and the location address at which the improper activity occurred.

When describing the Violation, please provide as much of the following information for each of your allegations and number each allegation, if there is more than one. Use additional pages if necessary.

Who? Who is involved? If outside businesses or contractors are involved, what are the names of the businesses, who owns them, and where are they located? Who else knows about the improper activities? Who can and would confirm that they occurred? How can we reach these witnesses?

What? What specifically did the suspect do? What is wrong with it? Are there laws or regulations that govern what the suspect did? What kinds of documents would provide evidence of the improper activities? Where are the documents located? Who controls them?

Where? Which division, unit, or campus location did the action happen? When? When did the improper activity occur? Is it ongoing? How frequently has it occurred?

Why? What are the suspect(s) motives? For example, how does the suspect benefit? If others benefit from the activities, who are they and how do they benefit?

How? How did the wrongdoing occur? Was there a lack of controls, circumvention of controls, or collusion with other individuals?

There are two ways to submit a report. Reports may be made anonymously or with identification.

- Complete an online form at www.olgchs.org/whistleblower
- Mail this form in an envelope marked "Confidential" to: John Ciccone, Compliance Officer for Whistleblower Matters, Our Lady of Good Counsel High School, 17301 Old Vic Blvd., Olney, MD 20832

REPORTER'S CONTACT INFORMATION (Not Required)

NAME: ……..…… POSITION: ……..…….

HOME ADDRESS: …….

……..

HOME: ……..…….. MOBILE: ……..…….…… WORK: ……..……..……..

BEST TIME/PLACE T REACH YOU: ……..

SUSPECT'S INFORMATION

NAME: ……..…… POSITION: ……..…….

HOME ADDRESS (if NON-EMPLOYEE): ……..……..…….

……..

HOME: ……..…….. MOBILE: ……..…….…… WORK: ……..……..……..

WITNESS(ES) – Please provide witnesses that can confirm your allegation

NAME: ……..…… POSITION: ……..…….

HOME: ……..…….. MOBILE: ……..…….…… WORK: ……..……..……..

NAME: …… POSITION: …….

HOME: ……..…….. MOBILE: ……..…….…… WORK: ……..……..……..

COMPLAINT

Briefly describe the improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation. Use as many pages as necessary.

What wrongdoing occurred?
Who did the wrongdoing?
When did this occur?
Where did this happen?
What enabled this to happen?

EVIDENCE

Please describe how an OLGCHS investigator could locate supporting documentation or attach a copy of evidence that you already have in your possession. You should NOT ATTEMPT TO OBTAIN evidence for which you do not have a right of access.