

The Public Education Foundation Whistleblower Policy

The Public Education Foundation requires directors, officers and employees to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of The Public Education Foundation, 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 The Public Education Foundation 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 in terms of ethics or suspected violations of law or regulations that govern Foundation's operations to the President & CEO or the Vice President of Human Resources.

No Retaliation It is contrary to the values of The Public Education Foundation for anyone to retaliate 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 The Foundation. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure The Public Education Foundation 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 Vice President of Human Resources. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Vice President of Human Resources, who has the responsibility to investigate all reported complaints. The Vice President of Human Resources will advise the President & CEO of all complaints and their resolution unless the complaint involves the President & CEO. At that time, the Vice President of Human Resources will advise the Vice Chair of Administration of the complaint. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, President & CEO or Vice President of Human Resources.

Accounting and Auditing Matters The Public Education Foundation's Vice President of Human Resources shall immediately notify the independent auditors and/or Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and is subject to discipline, including termination.

Confidentiality Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations The Public Education Foundation's Vice President of Human Resources will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.