

The Public Education Foundation Whistleblower Policy

The Public Education Foundation (PEF) requires all Board members, officers, and staff to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of The Public Education Foundation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

This Whistleblower Policy of PEF (1) encourages Board members, officers, and staff to come forward with credible information on illegal practices or serious violations of adopted policies of PEF; (2) specifies that PEF will protect the person from retaliation; and (3) identifies where such information can be reported.

1. **Encouragement of reporting.** PEF encourages complaints, reports or inquiries about illegal practices or serious violations of PEF's policies, including illegal or improper conduct by PEF itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which PEF has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via PEF's human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.
2. **Protection from Retaliation.** PEF prohibits retaliation by or on behalf of PEF against Board members, officers, and staff for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. PEF reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports, or inquiries or who otherwise abuse this policy.
3. **Where to report.** Complaints, reports, or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the basis of the complaints, reports, or inquiries. They should be directed to PEF's Chief Administrative Officer (CAO). If that person is implicated in the complaint, then reporting should be directed to the CEO or Chairman of the Board of Directors. PEF will conduct a prompt, discreet, and objective review or investigation. Staff must recognize that PEF may be unable to fully evaluate a vague or general complaint, report, or inquiry that is made anonymously.