

BLUFFVIEW MONTESSORI SCHOOL POLICY 750 WHISTLEBLOWERS

I. PURPOSE

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

II. GENERAL STATEMENT OF POLICY

It is the responsibility of all directors, officers, and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

III. DEFINITIONS

- A.** The term *whistleblower* refers to a director, officer, or employee who in good faith reports an ethics violation.

IV. ACTIVITIES

A. No Retaliations

No whistleblower shall suffer harassment, retaliation, or adverse employment consequence. 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. The Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Bluffview Montessori School prior to seeking resolution outside Bluffview Montessori School.

B. Reporting Violations

Bluffview Montessori School has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with a supervisor or if the employee is not satisfied with the supervisor's response, the employee is encouraged to speak with someone on the Board of Directors or anyone else in administration that the employee is comfortable approaching. Supervisors and managers are required to report suspected ethics violations to the Bluffview Montessori School's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when employees are not satisfied or are uncomfortable with following Bluffview Montessori School's open door policy, individuals should contact Bluffview Montessori School's Compliance Officer directly.

C. Compliance Officer

The Bluffview Montessori School Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Board Chair, the Finance and/or the Human Resources Committees. The Compliance Officer is required to report to the Board of Directors at least annually on compliance activity. The Bluffview Montessori School Compliance Officer is the Chairperson of the Board of Directors.

D. Accounting and Auditing Matters

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding organizational accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and shall work with the committee until the matter is resolved.

E. Acting in Good Faith

Anyone filing a 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.

F. Confidentiality

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

G. Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.