

WHISTLEBLOWER POLICY

Approved 11/16/2021

PURPOSE

At Reach for Excellence (“RFE”), we are committed to the highest levels of ethics and integrity in the way we conduct our program. We understand that this is crucial to our continued success, reputation and good will.

This Policy describes the mechanism for employees (including employees of Marist School who provide services to RFE under a service agreement), officers, directors, volunteers, parents, and students to report concerns regarding suspected violations of law and/or organizational policy, identifies the steps RFE will take to investigate such reports, and explains how RFE will support individuals who make good faith reports of suspected violations and protect them, including from retaliation. This Whistleblower Policy is in addition to, and does not replace, supersede, or affect, the policies or procedures for the reporting of violations of the Professional Boundaries Policy of Marist School or the mandatory reporting of child abuse as required by law--to which RFE is also subject.

REPORTING RESPONSIBILITY

It is the responsibility of all directors, officers, employees and volunteers to comply with all applicable laws and organizational policies and to report violations or suspected violations of laws or policies in accordance with this Whistleblower Policy. Volunteers, as well as parents and students, are also encouraged to report any suspected violations and may do so without fear of retaliation.

Reportable conduct includes anything that is reasonably suspected, in relation to RFE, to constitute misconduct, a violation of laws or policies, financial impropriety or fraud, or conduct that reflects a danger to the public, or RFE’s operations.

Nothing in this Policy is intended to interfere with an individual’s right to make good faith reports to any governmental agencies or departments.

REPORTING VIOLATIONS

RFE encourages open communication and suggests that officers, directors, employees, volunteers, parents, and students share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Executive Director is in the best position to address the concerns of employees, volunteers, parents, and students, and the Chair of the Board of Directors is in the best position to address concerns of officers and directors. If an individual is not comfortable communicating with the Executive Director or is not satisfied with his/her response, the individual should speak with someone on the Board of Directors of RFE (the “Board”) that the individual is comfortable approaching. All reports of a potential violation should be in writing to the Executive Director or Chair of the Board (or if the report concerns the Executive Director or Chair of the Board, to another member of the Board), as the case may be. To facilitate a complete investigation, individuals reporting suspected violations should provide as many details as possible, including a description of the questionable practice or behavior, the names of any persons involved and their roles/positions with RFE, the names of possible witnesses, dates, times and places, how the reporting individual became aware of the issue, and any other available details. Individuals may make anonymous reports, although complete anonymity may affect RFE’s ability to fully investigate and take appropriate action.

Any person who has complaints or concerns about RFE’s accounting, internal controls or auditing matters, or who becomes aware of concerns, should report such matters immediately. The Board of

Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director or Chair of the Board (or other member of the Board to whom a report has been made), as the case may be, **shall immediately notify the Board of Directors of any such complaint and work with the Board until the matter is resolved.**

ACTING IN GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation of applicable law or policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

CONFIDENTIALITY

Violations or suspected violations may be reported on a confidential basis by the complainant or may be reported anonymously (although, as previously stated, anonymous reports make impact RFE's ability to fully investigate and and/or take appropriate action). Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and to correct unlawful or unethical practices, as well as with applicable laws and regulations. In addition, the identity of any individual who makes a report will only be shared when he/she provides consent or RFE is required by law to disclose his/her identity. However, RFE may not require consent for disclosure in some circumstances, including when the reported information does not include the reporter's identity, RFE has taken reasonable steps to reduce the risk that the reporter will be identified, and disclosure is reasonably necessary for the investigation.

HANDLING OF REPORTED VIOLATIONS

All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. Anyone filing a complaint must provide RFE with reasonable opportunity to investigate and correct the alleged improper activity. RFE will notify the individual who submitted the complaint when an investigation has been completed, although RFE may be unable to disclose particular details or the specific outcome of the investigation. A report on investigations and responses will be made to the Board of Directors at least annually.

NO RETALIATION

No employee, officer, director, volunteer, parent, or student who in good faith reports a violation of an applicable law or policy to an appropriate person or group of people within RFE shall suffer harassment, retaliation or adverse consequences. Any officer, director, employee or volunteer who harasses or retaliates against someone who has reported a violation in good faith, or subjects such individual to adverse consequences, is subject to discipline up to and including termination of employment or, for non-employees, termination of the individual's affiliation with RFE. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within RFE prior to seeking resolution outside RFE. Those who believe they have been subjected to retaliation because they have made a report or participated in an investigation should immediately report such suspected retaliation to the Executive Director or Chair of the Board (or other member of the Board), as the case may be, in the same manner as described under "Reporting Violations."

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