

The Charter High School for Law and Social Justice Whistleblower Policy

Introduction

The Charter High School for Law and Social Justice (the “School”) requires its directors, officers, employees and volunteers, as well as all persons who provide the School with contracted services (each, a “Protected Person”), to observe high standards of business and personal ethics in the performance of their duties on the School’s behalf. As employees and representatives of the School, Protected Persons are expected to practice honesty and integrity in fulfilling their responsibilities and are required to comply with all applicable laws and regulations.

The objectives of this Whistleblower Policy are to encourage and enable Protected Persons, without fear of retaliation, to raise concerns regarding suspected unethical and/or illegal conduct or practices on a confidential and, if desired, anonymous basis so that the School can address and correct inappropriate conduct and actions.

This policy is not intended as a vehicle for reporting violations of the School’s human resources policies, problems with co-workers or managers, or for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be dealt with in accordance with the School’s personnel policies and procedures, as it is those policies and procedures that are applicable to such matters.

Reporting Responsibility

It is the responsibility of all Protected Persons to report in good faith any concerns they may have regarding actual or suspected activities that may be illegal or in violation of the School’s policies with respect to, without limitation, fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, and misuse of the School’s assets, as well as any violations or suspected violations of high business and personal ethical standards, as such standards relate to the School (each, a “Concern”), in accordance with this Whistleblower Policy.

No Retaliation

No Protected Person who in good faith reports a Concern shall suffer intimidation, harassment, retaliation, discrimination or adverse employment consequence because of such report. Any employee of the School who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment. Notwithstanding anything contained herein to the contrary, this Whistleblower Policy is not an employment contract and does not modify the employment relationship between the School and its employees. Nothing contained herein is intended to provide any Protected Person with any additional rights or causes of action, other than those provided by law.

Reporting Concerns

Any Concerns should be reported as soon as shall be practicable to the Chair of the School’s Audit Committee (the “Compliance Officer”) whose name and contact information will be on the School’s website or to the Principal or Director of Operations. The Principal or Director of

Operations shall immediately notify the Chair of the Audit Committee, in writing, of the complaint. Any questions with regard to the scope, interpretation or operation of this Whistleblower Policy should also be directed to the Compliance Officer.

Compliance Officer

The Compliance Officer is responsible for investigating and resolving all reported Concerns and shall advise the Audit Committee of all reported Concerns. The Compliance Officer shall report to the full Board of Directors at each regularly scheduled board meeting on compliance activity.

Accounting and Auditing Matters

The Audit Committee shall address all reported Concerns regarding the School's accounting practices, internal controls, or auditing ("Accounting Concerns"). The Compliance Officer shall immediately notify the Audit Committee of any Accounting Concern and shall work with the Committee until its resolution. Promptly upon receipt, the Audit Committee shall evaluate whether a Concern constitutes an Accounting Concern and, if so, shall promptly determine what professional assistance, if any, it needs in order to conduct an investigation. The Audit Committee will be free in its sole discretion to engage outside auditors, counsel, or other experts to assist in the investigation and in the analysis of results.

Investigations

The Compliance Officer may delegate the responsibility to investigate a reported Concern, whether an Accounting Concern or otherwise, to one or more employees of the School or to any other individual, including persons not employed by the School, selected by the Compliance Officer; provided that the Compliance Officer may not delegate such responsibility to an employee or other individual who is the subject of the reported Concern or in a manner that would compromise either the identity of an employee who reported the Concern anonymously or the confidentiality of the complaint or resulting investigation. Notwithstanding anything herein to the contrary, the scope, manner and parameters of any investigation of a reported Concern shall be determined by the Audit Committee in its sole discretion and the Corporation and its employees shall cooperate as necessary in connection with any such investigation.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing that the information disclosed may indicate a violation of law and/or ethical standards. The School will treat any proven knowingly false allegation as a disciplinary offense.

Confidentiality

The School takes seriously its responsibility to enforce this Whistleblower Policy and therefore encourages any person reporting a Concern to identify himself or herself so as to facilitate any resulting investigation. Notwithstanding the foregoing, in reporting a Concern, a Protected Person may request that the School treat such report in a confidential manner (including that the School take reasonable steps to ensure that the identity of the reporting person remains anonymous). Protected Persons may also report Concerns on an anonymous basis. The School will keep reports of Concerns confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Concerns

The Compliance Officer will acknowledge receipt of each reported Concern within five business days, but only to the extent the reporting person's identity is disclosed or a return address is provided. The Audit Committee will promptly investigate all reports of Concerns; the scope of any such investigation being within the sole discretion of the Committee, and the School will take appropriate corrective action that the investigation warrants.

Records

The Audit Committee will retain on a strictly confidential basis for a period of seven years (or otherwise as required under the School's record retention policies in effect at the time) all records relating to any reported Concern and to the investigation and resolution thereof. All such records are confidential to the Corporation and such records will be considered privileged and confidential.

Distribution

The Corporation shall distribute a copy of this Whistleblower Policy to all Protected Persons upon the commencement of their employment.

Compliance Officer Contact Information

[Name]

[Mailing Address]

[Phone Number]

[eMail Address]

Adopted by the Board of Trustees: December 3, 2014