

CASA DI MIR MONTESSORI SCHOOL
WHISTLEBLOWER POLICY

Updated 11/09

I. PURPOSE/OBJECTIVES

To ensure a reprisal free environment for employees to report ethical, legal, accounting, or auditing violations. Casa di Mir requires Board Members and employees to maintain high standards of ethical conduct at all times. As representatives of the School, Board Members and employees must practice honesty and integrity in fulfilling their responsibilities and complying with all applicable laws and regulations. The school is committed to maintaining a workplace where employees feel free to raise questions and concerns, such as a suggestion for improving a procedure, a concern about legal compliance, or an issue of ethics. It is the responsibility of all employees to comply with policies and procedures outlined in the Employee Handbook and to report violations or suspected violations. Casa di Mir will not tolerate reprisals against employees for raising issues of concern.

II. POLICY

It is the responsibility of all Board Members and employees to comply with the School's policies and to report ethical, legal, accounting, or auditing violations or suspected violations in accordance with this Whistleblower Policy.

No Board Member or employee who in good faith reports a violation shall receive harassment, retaliation or adverse employment consequence. A Board Member or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment for an employee and removal from the Board for a Board Member. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the School before seeking resolution outside the School.

Should an employee become aware of or suspect any violation, he/she is encouraged to speak with his/her supervisor. If the employee is not comfortable speaking with his/her supervisor or is not satisfied with his/her supervisor's response, he/she should speak with the Head of School. Supervisors and managers are required to report suspected violations to the Head of School, who must conduct an investigation of all reported violations.

All reported and investigated violations and any concerns or complaints regarding this Whistleblower Policy or any other School accounting policy or practice should be reported to the Head of School. The Head will work with the Board's Executive Committee to resolve any violation, concern, or complaint.

Violations or suspected violations may be submitted on a confidential basis 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.

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 an ethical, legal, accounting, or auditing violation. Any allegations that prove to not be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.