

CLARKSBURG CLASSICAL ACADEMY

WHISTLEBLOWER POLICY

Section 1. Purpose

The policy of the School as contained in its bylaws and conflict of interest and other policies, requires the directors, officers and staff members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As staff members and representatives of the School, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It also is our responsibility to report violations of these policies in accordance with this Whistleblower Policy. No director, officer, or staff member who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. The School has adopted this Whistleblower Policy to address the submission by directors, officers, and staff members of complaints, concerns and suspected violations with respect to one or more of the following matters:

1. Questionable accounting, internal accounting controls and auditing matters.
2. Compliance with legal and regulatory requirements.
3. A violation or suspected violation of School policy.
4. A retaliatory act against a director, officer, or staff member who reports a suspected violation of any of the above matters.

Section 2. Reporting Responsibility

It is the responsibility of all directors, officers, and staff members to comply with the policies and to report violations or suspected violations in accordance with this Whistleblower Policy. Under this Whistleblower Policy, it is a disciplinary issue for a staff member to know of ethical misconduct and stay silent.

Section 3. No Retaliation

No director, officer, or staff member who in good faith reports a violation of the Policy shall suffer harassment, retaliation, or adverse employment consequences. A staff member who retaliates against someone who has reported a violation in good faith is subject to discipline up to, and including, termination of employment. This Whistleblower Policy is intended to encourage and enable staff members and others to raise serious concerns within the School before seeking resolution outside the organization.

Section 4. Reporting Violations

Staff members should share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, a staff member's supervisor is in the best position to address an

area of concern. However, if you are not comfortable speaking with the supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Regional Vice President of the School's Educational Service Provider (ESP) or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Policy to the ESP's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the above procedure, individuals should contact the Compliance Officer directly.

Section 5. Compliance Officer

The Board is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Policy. If a director, officer, or staff member thinks it is inappropriate to report a complaint, concern, or suspected violation to the Compliance Officer, the complainant should report such matters to the President of the Board of Directors.

Section 6. Accounting and Auditing Matters

If a reported concern of complaint involves corporate accounting practices, internal controls, or auditing matters, the Compliance Officer shall immediately notify the Board and work with the Board until the matter is resolved. The Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing matters.

Section 7. Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offense.

Section 8. 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.

Section 9. Handling of Reported Violations

The Compliance Officer will notify the complainant 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.

Section 10. Acknowledgement and Distribution of Policy

As it is the intent of the School to strive for high ethical conduct from all directors, officers, and staff. The Board of Directors is particularly sensitive to individuals who hold management and governance positions of trust and confidence in fulfilling the mission and goals of the School. These sensitive positions include all officers, members of the Board of Directors, and the ESP's Regional Vice President and key senior staff members. Each of the above staff will receive a copy of this Policy, and any subsequent updates, and will be requested to acknowledge receipt (attached) of this Whistleblower Policy by July 1st of each year or upon hire. This acknowledgement will be kept on file in the personnel files of each staff member and in the board files for each board member.

Section 11. Records

The Compliance Officer shall retain for a period of at least seven (7) years, all records relating to any complaint, concern, or suspected violation reported in accordance with this Whistleblower Policy.

Policy Acknowledgement/Affirmation Statement

Whistleblower Policy

Clarksburg Classical Academy

This is to acknowledge receipt of Clarksburg Classical Academy's policy concerning Whistleblowers. I have carefully read and understand the policy and procedures contained in the Whistleblower Policy and acknowledge that it applies to me both in my present capacity and in any future position I may hold with the school and/or board of directors. I will comply with all said policies and procedures as set forth in the Whistleblower Policy. I understand that I should immediately report any violation of this policy.

I understand this Policy Acknowledgement/Affirmation Statement will be filed in my official personnel folder and/or board member folder.

Signature: _____ Date: _____

Printed Name: _____