

LARCHMONT SCHOOLS WHISTLEBLOWER POLICY

The Larchmont Schools are committed to lawful and ethical behavior in all of its activities and requires board members, officers and employees to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The objectives of the Larchmont Schools' Whistleblower Policy are to establish policies and procedures to:

- Prevent or detect and correct improper activities
- Encourage each board member, officer and employee (or "Reporting Individual" or "Reporter") to report what he or she in good faith believes to be a material violation of law or policy or questionable accounting or auditing matter by the Charter School.
- Ensure the receipt, documentation, retention of records, and resolution of reports received under this policy protect reporting individuals from retaliatory action.

Reporting Responsibility

Each reporting individual has an obligation to report what he or she believes is a material violation of law or policy or any questionable accounting or auditing matter by the Larchmont Schools, its board members, officers and employees or other representatives. Reporters must also notify the Larchmont Schools if an action needs to be taken in order for the Larchmont Schools to be in compliance with law or policy or with generally accepted accounting practices. The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- Providing false or misleading information on Larchmont Schools financial documents, grant reports, tax returns or other public documents;
- Providing false information to or withholding material information from Larchmont Schools auditors, accountants, lawyers, directors or other representatives responsible for ensuring compliance with fiscal and legal responsibilities;
- Embezzlement, private benefit, or misappropriation of funds;
- Material violation of Larchmont Schools policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention;
- Discrimination based on race, gender, sexual orientation, ethnicity, and disability, or any other unlawful biases;
- Facilitation or concealing any of the above or similar actions.

Reporting Concerns

Whenever possible, employees should seek to resolve concerns by reporting issues directly to his/her manager or to the next level of management as needed until matters are satisfactorily resolved. However, if for any reason an employee is not comfortable speaking to a manager or does not believe the issue is being properly addressed, the employee may contact the Director of Human Capital or the Executive Director. If an employee does not believe that these channels of communication can or should be used to express his/her concerns, an employee may contact Chair of the Board of Directors.

Handling of Reporting Violations

Except otherwise required by law, or as otherwise required by court order, the Larchmont Schools will investigate all reports filed in accordance with this policy with due care and promptness. Matters reported internally without initial resolution will be investigated by the Director of Human Capital or the Executive Director to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. Larchmont Schools staff will issue a full report of all matters raised under this policy to the Board of Directors. The Board of Directors may conduct a further investigation upon receiving the report.

For matters reported directly to the Chair of the Board of Directors, the Board of Directors shall promptly acknowledge receipt of the complaint to the complainant if the identity of the complainant is known and conduct an investigation to determine if the allegations are true and whether the issue is material and what, if any, corrective action is necessary. Upon the conclusion of this investigation, the Board of Directors shall promptly report its findings to all pertinent parties.

Authority of Investigative Parties

The Investigative Parties (Executive Director, Director of Human Capital or Board of Directors) shall have full authority to investigate concerns raised in accordance with this policy and may retain outside legal counsel, accountants, private investigators, or any other resource that is necessary to conduct a full and complete investigation of the allegations.

No Retaliation

This Whistleblower Policy is intended to encourage and enable board members, officers and employees to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no board member, officer or employee who, in good faith, reports a concern shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of an employee, suffer adverse employment consequences as a result of such report. Moreover, an employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination of employment.

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the matter raised is a serious violation of law or policy or a material accounting or auditing matter. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, the Larchmont Schools cannot guarantee complete confidentiality. Disclosure of information relating to an investigation under this policy by staff, directors, or others involved with the investigation of the Larchmont Schools to individuals not involved in the investigation will be viewed as a serious disciplinary offense and, with respect to Larchmont Schools employees, may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Adopted/Ratified on September 11, 2012

Marya Francis, Secretary