

Partnership Scholars Program (PSP) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of PSP, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations. This policy relates to PSP directors, officers, employees, volunteers, students and care-givers of PSP students who report what they perceive to be wrongdoing within the organization (the "Whistleblower Policy").

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that PSP can address and correct conduct and actions that may be perceived to be inappropriate. It is the responsibility of all board members, officers, employees and volunteers to report concerns about suspected violations of law that govern PSP's operations.

No Retaliation

It is contrary to the values of PSP for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports a suspected ethical violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of PSP. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

PSP has an open-door policy. Any employee or other PSP stakeholder may share their questions, concerns, suggestions or complaints with their immediate supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director. <u>Click here to email the Executive Director</u>.

If you are not comfortable speaking with the Executive Director or are not satisfied with the Executive Directors' response to your report, you are encouraged to speak with the Chair of PSP's Board Governance Committee. <u>Click here to email the Chair of PSP's Board Governance</u> <u>Committee.</u>

Supervisors and managers are required to report complaints or concerns about suspected ethical or legal violations in writing to the Chair of PSP's Board Governance Committee, who has the responsibility to investigate all reported complaints of suspected ethical or legal violations. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the Chair of PSP's Board Governance Committee. PSP's Governance Committee Chair can be reached via email at <u>whistleblower@partnershipscholars.org</u>.

Executive Director

PSP's Executive Director is responsible for ensuring that all complaints about suspected ethical or legal violations are investigated and resolved. The Executive Director will advise the Board of Directors of all complaints about suspected ethical or legal violations and their resolution. The Executive Director will also report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

PSP's Executive Director shall immediately notify the Finance Committee of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any claims that are known to be false when made, or are made maliciously and with the intent to injure another person, will be viewed as a serious disciplinary offense.

Confidentiality

Reports of suspected violations may be submitted on a confidential basis by the complainant. Reports of suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. PSP may share allegations with individuals to whom disclosure is reasonably necessary to conduct an adequate investigation.

Handling of Reported Violations

The person or persons receiving a report of a suspected violation (including, as appropriate, the reporter's supervisor, PSP's Executive Director, or the Chair of Board Governance Committee), will notify the person who submitted a complaint and acknowledge receipt of the complaint. All complaints will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.