



WHISTLEBLOWER POLICY OF KIPP CHARLOTTE

I. Introduction

KIPP Charlotte establishes a whistleblower policy, outlines the process for reporting and handling concerns, and addresses confidentiality and consequences for school employees, volunteers, and board of directors.

II. Code of Conduct

KIPP Charlotte requires directors, officers, employees and other volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of KIPP Charlotte must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objective of the KIPP Charlotte Whistleblower Policy is to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or auditing matters by employees, directors, officers, and other stakeholders of KIPP Charlotte, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of directors, volunteers and employees reporting concerns from retaliatory actions.
- The submission of concerns regarding violations of the KIPP Charlotte Code of Conduct. See specific information on handling employee concerns found in the Employee Handbook.

III. Reporting responsibility

Each director, volunteer, and employee of KIPP Charlotte has an obligation to report in accordance with this Whistleblower Policy:

- a) Questionable or improper accounting or auditing matters, and
- b) Violations and suspected violations of KIPP Charlotte Code of Conduct, here after collectively referred to as 'concerns'.

IV. Governance Committee

The KIPP Charlotte Governance Committee is responsible for investigating and resolving all Whistleblower allegations and all reported complaints and allegations concerning violations of the Code of Conduct. Upon their discretion, the Governance Committee shall advise the Chair of the Board of Directors and the Executive Committee. The Governance Committee is required to report to the Executive Committee at least annually on compliance activity and resolution of concerns. The Governance Committee Chair is charged with the responsibility of making that report to the Executive Committee.



V. No retaliation

No director, officer, employee or volunteer who in good faith reports a violation of the Code of Conduct shall suffer harassment, retaliation or adverse employment consequence. 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within KIPP Charlotte prior to seeking resolution outside of KIPP Charlotte.

VI. Reporting violations

Employees

This Code of Conduct addresses KIPP Charlotte's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly.

In most cases, an employee's supervisor is in the best position to address an area of concern. However, if the employee is not comfortable speaking with the supervisor or is not satisfied with the supervisor's response, the employee should speak with someone on the Governance Committee, who will have the responsibility of directing the concern to the Governance Committee.

Supervisors and managers are required to report suspected violations of the Code of Conduct to KIPP Charlotte Governance Committee, which has specific and exclusive responsibility to investigate all reported violations. Reports must be made in writing.

When the employee is not satisfied or uncomfortable with following KIPP Charlotte's open door policy, the employee should contact any member on the Governance Committee directly, who will have the responsibility of directing the concern to the Governance Committee.

Concerns may also be submitted anonymously. Such anonymous concerns should be in writing and sent direct to any member on the Governance Committee, who will have the responsibility of directing the concern to the Governance Committee.

Directors and other volunteers

Directors and other volunteers should submit concerns in writing directly to any member of the Governance Committee, and the committee member contacted will have the responsibility of directing the concern to the Governance Committee.

VII. Handling of reported violations

The Governance Committee shall address all reported concerns. Upon their discretion, the Governance Committee shall advise the Chair of the Board of Directors, the School Leader, if appropriate, and the Executive Committee of any such report. The Chair of the Governance Committee will notify the sender and acknowledge receipt of the concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.



The Governance Committee will promptly investigate all reports, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern.

The Governance Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

VIII. Acting in good faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the Code of Conduct. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, 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 dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

IX. Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

X. Effective date

This policy is effective Aug. 1, 2009.