

COLOGNE ACADEMY
MANUAL OF SCHOOL POLICIES APPROVED BY THE BOARD

430: REPORTING UNETHICAL OR ILLEGAL ACTIVITY

I. PURPOSE

The purpose of this policy is to promote the reporting of suspected or actual unethical or illegal activity.

II. GENERAL STATEMENT OF POLICY

Cologne Academy requires directors, officers and employees to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the school, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

III. RESPONSIBILITY

It is the responsibility of all directors, officers and employees to comply with this policy and to report violations or suspected violations in accordance with this policy.

IV. NO RETALIATION

No director, officer or employee who in good faith reports a violation 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 policy is intended to encourage and enable employees and others to raise serious concerns within the school prior to seeking resolution outside the school.

V. REPORTING VIOLATIONS

The school promotes an 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 an employee is not comfortable speaking with his/her supervisor or is not satisfied with the supervisor's response, the

employee is encouraged to speak with someone on the Board of Directors. Supervisors and administration are required to report suspected violations to the Board Chair or Treasurer, or other board member as appropriate.

VI. BOARD PRESIDENT AND TREASURER

The Board Chair and Treasurer are considered the school's Compliance Officers and are responsible for investigating and resolving all reported complaints and allegations concerning violations and shall advise the entire Board of Directors and the School Director. The Board Chair and Treasurer will report to the entire at least annually on compliance activity.

If the allegation is against the Board Chair or Treasurer, the complaint should be made to any other Board member who shall call a closed meeting, at which time the Board shall consider the allegations and designate responsibility for investigating the allegations

VII. ACCOUNTING AND AUDITING MATTERS

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding the school's accounting practices, internal controls or auditing. The Finance committee will report all complaints or concerns to the entire Board of Directors.

VIII. ACTING IN GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations proven to have been made knowing them to be false will be viewed as a serious disciplinary offense.

IX. PRIVACY

Violations or suspected violations may be submitted anonymously. However, non-anonymous reports are encouraged in light of the potential need to conduct an adequate investigation. Reports of violations or suspected violations will be kept private to the extent possible, consistent with the Minnesota Government Data Practices Act and the need to conduct an adequate investigation.

X. HANDLING OF REPORTED VIOLATIONS

The Board Chair or Treasurer will notify the sender (of a non-anonymous complaint) and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated when appropriate and appropriate corrective action will be taken if warranted by the investigation.