



Branson Whistleblower Policy

The Branson School requires members of its Board of Trustees, its administrators, faculty and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Trustees and employees of the School must fulfill their responsibilities with honesty and integrity, and comply with all applicable laws and regulations.

This Whistleblower Policy is intended to encourage and enable Trustees, employees and other members of the School community to raise serious concerns so that the School can address and correct inappropriate conduct and actions promptly. It is the responsibility of all Trustees, employees and volunteers to report concerns about violations of the School's policies, suspected violations of law or regulations that govern the School's operations, questionable or improper accounting or auditing matters, or the failure of any Trustee, employee or volunteer of the School to perform his or her duties honestly and with integrity.

No Retaliation

It is contrary to the values of the School for anyone to retaliate against any member of the School community who in good faith reports a matter in accordance with this Whistleblower Policy. 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. Retaliation includes discharge, demotion, suspension, threats, harassment, or any adverse employment action. Anyone who believes they have been subject to retaliation for reporting a concern should immediately inform the Head of School or the Chair of the Board of Trustees or the Secretary of the Board of Trustees.

Reporting Procedure

Any member of the School community, including Trustees, employees, students, volunteers and parents, who has a concern regarding violations of the School's policies, suspected violations of law or regulations that govern the School's operations, financial improprieties or fraud (including accounting and auditing matters), or the failure of any Trustee, employee, student or volunteer of the School to perform his or her duties honestly and with integrity should follow one of the following procedures:

1. Head of School: A person wishing to raise a concern that does not involve the Head of School or a Trustee should contact the Head of School by telephone, email or in person to submit the concern.

2. Board Representative: If the concern involves the Head of School or a Trustee, the concern should be submitted to Chair of the Board of Trustees or the Secretary of the Board of

Review of Concerns

How concerns are reviewed depends on the subject of the concern.

1. For concerns involving personnel or student/parent matters not involving the Head of School or a Trustee, the Head of School will review the concern, conduct an investigation as appropriate and respond to the person reporting the concern if that person has identified him or herself. If the person reporting the concern is not satisfied with this response, he or she may request a further review by submitting a request to the Board Chair.
2. For concerns involving the Head of School or a Trustee, the Board Chair or the Secretary of the Board will review the concern, conduct an investigation as appropriate and respond to person reporting the concern if the person has identified him or herself.
3. For concerns involving financial improprieties or fraud, the Finance Committee of the Board of Trustees will review the concern, conduct an investigation as appropriate and respond to the person reporting the concern if that person has identified him or herself. If a member of the Finance Committee is implicated in the concern in any way, that member will recuse him or herself from consideration of the concern.

Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with applicable law, and to provide the School and/or accused individuals their legal rights of defense.

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