



Peninsula Education Foundation (PEF)

Whistleblower Protection Policy

PEF requires Trustees, 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 PEF, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that PEF can address and correct inappropriate conduct and actions. It is the responsibility of all Trustees, Officers, employees and volunteers to report concerns about violations of PEF's code of ethics or suspected violations of law or regulations that govern PEF's operations, including, without limitation, the following:

- Fraud or fraudulent statements to the IRS, the public or organizations doing business with or on behalf of PEF;
- Violations of IRS rules and regulations applicable to PEF, including but not limited to those related to accounting, internal accounting controls and auditing matters;
- Intentional error or fraud in the preparation, review or audit of any financial statement of the PEF or significant deficiencies in or intentional noncompliance with PEF's internal accounting controls; and
- Serious violations of any PEF policies, including employee grievances regarding illegal or improper conduct PEF, by its leadership, or by others on its behalf.

No Retaliation

It is contrary to the values of PEF for anyone to retaliate against any Board member, Trustee, Officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of PEF. Retaliation against someone who has reported a violation in good faith will result in disciplinary and/or appropriate corrective action.

Reporting Procedure

PEF has an open door policy and suggests that employees or others share their questions, concerns, suggestions or complaints with the Executive Director. Those not comfortable speaking with the Executive Director or who are not satisfied with his or her response, are encouraged to speak with the President of the Board of Trustees. Those with concerns or complaints may also submit their concerns anonymously in writing directly to the Executive Director.

Compliance Officer

The PEF's Executive Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Executive Director will promptly advise the Board of Trustees of all complaints and their resolution and will report at least annually to the VP of Finance and the Chairperson of the Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The Executive Director shall immediately notify the Audit Committee and Finance Committee of any concerns or complaint 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 violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The PEF's Executive Director (or Audit Committee if suspected violation involves Executive Director) will acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. All complaints and documents relating to their investigation through the above procedures shall be retained for a period of three years following the completion of the investigation, except to the extent the information pertains to a pending or potential litigation or investigation, in which case the records must be retained for the duration of the litigation or investigation.

PEF Compliance Officer:

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*Revision History by the PEF Board
Initial Conflict of Interest policy 10/23/13*