Board of Trustees of Nativity Prep Academy of San Diego, Inc.
Whistleblower Protection Policy

Nativity Prep Academy of San Diego, Inc., requires trustees, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Nativity Prep, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

**Reporting Responsibility**
This Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Nativity Prep can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of Nativity Prep’s code of ethics or suspected violations of law or regulations that govern our operations.

**No Retaliation**
It is contrary to the values of Nativity Prep for anyone to retaliate against any board member, 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 Nativity Prep. 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**
Nativity Prep has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their respective administrator. If you are not comfortable speaking with your administrator or you are not satisfied with your administrator’s response, you are encouraged to speak with the President or with the Chair of the Board of Trustees (or another trustee). Administrators are required to report complaints or concerns about suspected ethical and legal violations in writing to the Chairperson of the Board of Trustees, Nativity Prep Academy, 2755 55th Street, San Diego, California, 92105, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their administrator or to the President.

**Compliance Officer**
Nativity Prep’s Board Chairperson and/or President are/is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Board Chairperson will advise the Board of Trustees of all complaints and their resolution and will report at least annually to the full Board on compliance activity relating to accounting or alleged financial improprieties.
**Accounting and Auditing Matters**
The Board Chairperson 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 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 disciplinary 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 Board Chairperson will notify the person who submitted a complaint and 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.

*Note on Compliance Officer:* The Compliance Officer may be a board member, the President, or a third party designated by the organization to receive, investigate, and respond to complaints.

*Approved by the Board of Trustees of Nativity Prep Academy, February 2015*