



Whistleblower Policy
April 2021

Studio School of Design requires directors, 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 the Studio School of Design 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, students and others to raise serious concerns internally so that Studio School of Design can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, students and volunteers to report concerns about suspected violations of law or regulations that govern Studio School of Design's operations and/or any behavior they believe is unethical or illegal.

No Retaliation

It is contrary to the values of Studio School of Design 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 Studio School of Design. Retaliation is strictly prohibited and an employee who retaliates against someone who has reported a violation is subject to discipline up to and including termination of employment.

Compliance Officer (Peter Vincent)

The Studio School of Design's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

Reporting Procedure

Studio School of Design has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with Peter Vincent, Director and Compliance Officer. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to Peter Vincent, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the co-Executive Directors, and Individuals making a complaint may also bring their concerns to any member of the Board of Directors

Handling of Reported Violations

Studio School of Design's Compliance Officer 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.

Investigation

All relevant Studio School matters concerning a suspected violation, including suspected but unproved matters, will be promptly reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. The Board will discuss the matter and what steps would be taken to remedy it at its next scheduled board meeting or if pressing, at a specially called one. When advisable, the Board may engage outside counsel or investigators in response to a complaint. The Board discussions and the resulting outcome will be documented in the minutes of the Board meeting. When the matter is discussed at a Board meeting, the person against whom the potential complaint has been raised shall not be present nor will they have the ability to vote on the matter. Appropriate corrective action will be taken, if necessary, and findings may be communicated to the reporting person and their supervisor or manager.

Accounting and Auditing Matters

The Studio School of Design's Compliance Officer shall immediately notify the Board of Directors 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, but there is no guarantee that confidentiality will in all cases be able to be maintained.

Compliance Officer:

Peter Vincent

Member of the Board of Directors

peter@vincentcs.com

This policy is to be distributed to anyone joining Studio School and to all staff annually.

Policy approved by the Board of Directors on April 30, 2021