

Policy Number: 01.011

Policy Title: Whistleblower Policy Antioch College Continuation Corporation

Policy Type: Board Policy

Governing Body: Board of Trustees

Date of Current Revision or Creation: May 22, 2010

Whistleblower Policy Antioch College Continuation Corporation

This whistleblower policy (this “**Policy**”) of Antioch College Continuation Corporation (the “**Corporation**”) is intended to encourage the Corporation’s Board members, staff, volunteers, and others to report suspected or actual occurrence(s) of illegal, unethical, inappropriate events (behaviors or practices) without retribution (any such person reporting such occurrences or events is hereinafter referred to as a “**Whistleblower**”). The Policy is as follows:

1. The Whistleblower should promptly report the suspected or actual event to his/her supervisor.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower should report the event to the next highest or another level of management, including to an appropriate Board committee or Board member.
3. The Whistleblower may report the event with his/her identity or anonymously.
4. The Whistleblower shall receive no retaliation or retribution by the Corporation for a report that was provided in Good Faith. For the purposes of this Policy, “**Good Faith**” means the making or filing of a report under this Policy that was not done primarily with malice to damage another person or the Corporation.
5. A Whistleblower who makes a report that is not done in Good Faith is subject to discipline including, but not limited to, termination of his/her relationship with the Corporation, or other legal means to protect the reputation of the Corporation and members of its Board and staff.
6. Anyone who retaliates against the Whistleblower (who reported an event in Good Faith) will be subject to discipline including, but not limited to, termination of such retaliating persons relationship with the Corporation.
7. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
8. Supervisors, managers, and/or Board members who receive any report from a Whistleblower hereunder must promptly act to investigate and/or resolve the issue.

9. The Whistleblower who files a report shall receive a report from the Corporation within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.

10. The identity of the Whistleblower, if known, shall remain as confidential as possible (depending on the circumstances) to those persons directly involved in applying this Policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

Policy was approved by the Board of Trustees of the Corporation on May 22, 2010

Print Name: Pavel Curtis

Title: Secretary