

HighScope Whistleblower Policy

Effective Date

This policy is effective August 1, 2026.

Policy Overview

The purpose of this Whistleblower Policy is to encourage employees, volunteers, contractors, and other stakeholders to report any suspected wrongdoing, illegal activities, or unethical behavior without fear of retaliation. This policy aims to promote transparency, integrity, and accountability within the organization.

Policy Details

Scope

This policy applies to all individuals associated with the organization, including but not limited to:

- Employees (full-time, part-time, temporary)
- Volunteers
- Contractors and consultants
- Board members

What Should Be Reported

Reports may include, but are not limited to:

- Fraud or financial misconduct
- Misuse of organizational resources
- Theft or embezzlement
- Harassment, discrimination, or abuse
- Violations of laws, regulations, or internal policies
- Health and safety violations
- Conflicts of interest

Reporting Procedure

Individuals should report suspected violations of wrongdoing in good faith as soon as reasonably possible.

Reports may be made verbally or in writing, including by email, mail, or other forms of communication.

Individuals may report concerns through any of the following channels:

- Immediate supervisor or manager (unless that individual is involved in the allegation)
- Executive Director / Chief Executive Officer (CEO)



- Human Resources representative
- Board Chair

Any representative who receives a whistleblower report must promptly forward the report to the Head of Human Resources for coordination of the investigation. If the report involves the Head of Human Resources, it must instead be forwarded directly to the Chief Executive Officer or the Board Chair.

Anonymous reports will be accepted and investigated to the extent reasonably possible. However, individuals are encouraged to provide their name and contact information, as doing so may assist in conducting a thorough investigation.

The Head of Human Resources serves as the designated point of contact for receiving, documenting, and coordinating whistleblower reports, unless otherwise directed by the Board of Directors.

Investigation Process

All reports made in good faith will be taken seriously and reviewed promptly. The Organization will acknowledge receipt of a report as soon as practicable, **generally within five (5) business days**, when the reporting individual has provided contact information.

Reports will be investigated as promptly, thoroughly, and impartially as circumstances permit. Investigations will be conducted confidentially to the fullest extent possible.

Depending on the nature and complexity of the allegations, HighScope may assign the investigation to an internal investigator or engage an external investigator or other qualified professional.

Where appropriate and permitted by law, the reporting individual will be provided periodic updates regarding the status of the investigation and will be notified when the investigation has been concluded.

Appropriate corrective action will be taken when an investigation substantiates a violation of law, policy, or other misconduct.

Protection from Retaliation

No individual who makes a report in good faith shall suffer harassment, retaliation, or adverse employment consequences. Any form of retaliation will be treated as a serious violation of this policy and may result in disciplinary action, up to and including termination.

False Allegations

Deliberately false or malicious reports may result in disciplinary action. This does not apply to reports made in good faith that turn out to be unsubstantiated.

Confidentiality

All reports and investigations will be handled with the utmost discretion. Information will be shared strictly on a need-to-know basis.

Review and Communication

This policy will be reviewed periodically by the Board or HR department to ensure its effectiveness. All employees and stakeholders will be made aware of this policy upon onboarding and through regular reminders.