FLINTRIDGE PREPARATORY SCHOOL WHISTLEBLOWER POLICY

Flintridge Preparatory School (the "School") is committed to the highest standards of financial reporting and lawful and ethical behavior. Additionally, the School is committed to full compliance with all state and federal statutes, rules and regulations by all employees and all members of the Board of Trustees (the "Board").

Reporting

The School encourages all Board members, employees, and others affiliated with the School to report any illegal or unethical conduct in connection with the School finances or other aspects of its operations.

Should any person know or have a reasonable belief that persons associated with the School plan to engage or have engaged in illegal or unethical conduct in connection with the finances or other aspects of the School's operations, that person should immediately report his or her concerns (the "Complaint") to the School's Head of School. An individual making such a Complaint may request anonymity or submit an anonymous written Complaint to the Head of School. If the Complaint concerns the Head of School or the individual is not comfortable reporting to the Head of School, then the Complaint may be made to or be filed with the Chair of the Board of Trustees or the Chair of the Audit Committee of the Board.

Upon receipt of a Complaint, the Head of School shall immediately apprise the Chair of the Board or the Chair of the Audit Committee of the Complaint and promptly investigate and respond to the individual filing the Complaint. Moreover, the Head of School shall report all Complaints (and their resolution, if applicable) to the Board at its next regularly scheduled meeting. If the Head of School believes it is warranted, or the Complaint is made to the Chair of the Board or Chair of the Audit Committee, the Head of School, the Chair of the Board, or the Chair of the Audit Committee shall promptly report the Complaint to the full Board (except to Board members who may be the subject of the Complaint), and the Board shall promptly investigate and respond to the individual filing the Complaint.

All credible allegations will be followed up promptly, with further investigation conducted if needed to resolve disputed facts. In conducting any investigation, the School will respect any person's request for confidentiality and/or anonymity and will strive to keep the identity of other complainants as confidential as possible, consistent with the need to conduct a thorough review and investigation. All records of Complaints and subsequent investigations shall be maintained in a confidential manner and in accordance with the School's document retention policy.

The School will take appropriate action in response to any Complaints, including, but not limited to, disciplinary action (up to and including termination) against any person who, in the Head of School's or the Board's assessment, has engaged in misconduct. Such misconduct shall be reported to the relevant civil or criminal authorities as may be required by law.

No Retaliation

The School will not knowingly, with the intent to retaliate, take any action harmful to any person, including interference with lawful employment or livelihood, for reporting a Complaint in good faith pursuant to this policy or to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. Likewise, there will be no punishment or other retaliation for providing information regarding a Complaint in good faith to, or otherwise assisting in any investigation regarding a Complaint conducted by, the School, law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant.

An employee or other person affiliated with the School who has made a Complaint or who provided information regarding a Complaint and who subsequently believes he or she has been subjected to retaliation should immediately report it anonymously by contacting SAFE Hotline. Dial 1.855.662.7233 or visit safehotline.com. Flintridge Preparatory School's company code is 7084408360. An individual who deliberately or maliciously provides false information, however, may be subject to disciplinary action (up to and including termination).