

**“ENSURING ALL CHILDREN HAVE  
ACCESS TO A QUALITY PUBLIC  
SCHOOL EDUCATION.”**



# **POLICY:**

# **WHISTLEBLOWER PROTECTION**

**ADOPTED: JANUARY 2014**

**THE FRANKLIN FOUNDATION FOR INNOVATION**

**AUTHORED BY:**

**EXECUTIVE COMMITTEE**

OF THE BOARD OF DIRECTORS

**THE FRANKLIN FOUNDATION FOR INNOVATION**

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# WHISTLEBLOWER PROTECTION POLICY

## The Franklin Foundation for Innovation

**APPROVED:** January 2014

**SCOPE:** All Directors, Executives, Employees, and Volunteers

**ARTICLE I: Purpose.** Every member of this organization is expected to practice honesty and integrity in fulfilling all responsibilities and duties, while maintaining consistent and uncompromising compliance with all applicable state, local, and federal laws and regulations. All Directors, Executives, Employees, and Volunteers of the Foundation are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities to the Foundation. This Whistleblower protection policy is not intended to be a vehicle for reporting internal matters such as (1) violations of The Franklin Foundation for Innovation's human resources policies, (2) problems with colleagues, or (3) issues related to allegations of sexual harassment, misconduct, discriminations, or any other form of unlawful harassment. Such violations should be handled separately as outlined in the Foundation's employee handbook.

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### ARTICLE II: Reporting Responsibility.

It is the responsibility of all directors, officers and employees to report violations or suspected violations of high business and personal ethical standards in accordance with this Whistleblower Protection Policy. All directors, officers and employees should report, in good faith, any action or suspected action taken by or within The Franklin Foundation for Innovation that is illegal, fraudulent or in violation of any adopted policy of the Foundation (hereinafter a "Violation" or "Violations"). Violations include, but are not limited to, suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of assets or suspected regulatory, compliance, and ethics-related issues, concerns or violations.

### ARTICLE III: No Retaliation.

No director, officer or employee who in good faith reports a Violation shall suffer intimidation, harassment, discrimination, or other retaliation or, in the case of employees, adverse employment consequences. A director, officer or employee who retaliates against someone who has reported a Violation in good faith is subject to discipline up to and including termination of employment and/or removal from office. This policy is intended to protect from retaliation persons who report suspected improper conduct and to encourage and enable directors, officers and employees to raise concerns relating to Violations within The Franklin Foundation for Innovation prior to seeking **resolution outside of the organization.**

**ARTICLE IV: Reporting Violations**

Questions, concerns, suggestions or complaints regarding a violation can be addressed directly to the Chairman of the Board or to the Vice Chair of the Board. The purpose of including the Chairman and Vice Chairman is that if the issue of concern involves the Chairman of the Board, the Vice Chairman of the Board is available to learn of the concern and to take the required actions. Employees are also encouraged to speak with their leader(s) or a representative from Talent to address an area of concern, or anyone on the management team of The Franklin Foundation for Innovation.

**ARTICLE V: Responsibilities**

The Chairman or Vice Chairman of the Board shall be responsible for investigating and resolving all reported complaints and allegations concerning Violations and the ethical and legal standards noted above and shall advise the Governance Committee and General Counsel of the Foundation of all such complaints and allegations. The Chair of the Governance Committee shall be required to report to the Board of Directors at least annually regarding such complaints and allegations.

**a. Auditing, Accounting, and Finance Matters**

The Finance & Audit Committee shall address all reported concerns or complaints regarding corporate accounting practices, tax compliance, internal controls or auditing brought to its attention. The Chairman or Vice Chairman of the Board shall immediately notify the Finance & Audit Committee of any such complaint and work with the Finance & Audit Committee until the matter is resolved.

**ARTICLE VI: Good Faith**

Anyone reporting a complaint concerning a Violation must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the ethical and legal standards noted above. Any allegations that prove not to be substantiated and prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. Violators of the good faith clause are subject to disciplinary review which may include termination.

**ARTICLE VII: Confidentiality**

Any and all violations submitted are submitted confidentially. Violations may also be submitted anonymously. Reports of violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and corrective action (when appropriate).

**ARTICLE VIII: Violation Management**

1. The Chairman or Vice Chair of the Board will notify the sender confidentially and acknowledge receipt of the reported violation (where not made anonymously) within five (5) business days of receipt.
2. The chair of the Governance Committee will empower the committee to investigate all reports promptly and take appropriate corrective action where warranted.



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