



Revised: October 10, 2025; August 12, 2022; November 28, 2011; July 25, 2011

Adopted: September 2008

430 REPORTING VIOLATIONS OF CODE OF CONDUCT & ETHICS (WHISTLEBLOWER POLICY)

I. PURPOSE

The purpose of this policy is to promote the reporting of suspected or actual unethical or illegal activity.

DaVinci Academy of Arts and Science requires charter school board members, community members, and employees to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. All charter school board members, community members, and employees must comply with all applicable laws and regulatory requirements.

II. REPORTING RESPONSIBILITY

It is the responsibility of charter school board members, community members, and employees to comply with the Code of Conduct and Ethics and to report violations or suspected violations in accordance with this policy.

The Code of Conduct and Ethics addresses DaVinci Academy's open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, 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 someone on the DaVinci Academy Board of Directors or anyone in charter school administration whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct and Ethics to the Charter School Board Chair or Treasurer, who have specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following DaVinci Academy's open door policy, individuals should contact the DaVinci Academy Board of Directors.

III. NO RETALIATION

No charter school board member, community member, or employee who in good faith reports a violation of the Code of Conduct and Ethics shall suffer harassment, retaliation, or adverse

employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This policy is intended to encourage and enable persons to raise serious concerns within DaVinci Academy prior to seeking resolution outside DaVinci Academy.

IV. COMPLIANCE OFFICER

The Charter School Board Chair and Treasurer are considered the Organization's Compliance Officers and are responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code of Conduct and Ethics and shall advise the entire Charter School Board of Directors and the Executive Director. The Charter School Board Chair and Treasurer will report to the entire Charter School Board of Directors at least annually on compliance activity.

V. ACCOUNTING AND AUDITING MATTERS

The Finance Committee of the Charter School Board of Directors shall address all reported concerns or complaints regarding DaVinci Academy's accounting practices, internal controls, or auditing. The Compliance Officer(s) shall immediately notify the Finance Committee of any such complaint and work with the Finance Committee until the matter is resolved. The Finance Committee will report all complaints or concerns to the entire Charter School Board of Directors.

If the allegation is against the Board Chair or Treasurer, the complaint should be made to any other Charter School Board member who shall call a closed meeting (in accordance with the Minnesota Open Meeting Law), at which time the Charter School Board shall consider the allegations and designate responsibility for investigating the allegations.

VI. ACTING IN GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation of the Code of Conduct and Ethics, law, or regulation requirements 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.

VII. CONFIDENTIALITY

Violations or suspected violations may be submitted on a confidential basis or may be submitted anonymously. However, non-anonymous reports are encouraged in light of the potential need to conduct an adequate investigation. Reports of violations or suspected violations will be kept private to the extent possible, consistent with the Minnesota Government Data Practices Act and the need to conduct an adequate investigation.

VIII. HANDLING OF REPORTED VIOLATIONS

The Compliance Officer(s), or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.