

Phillips Exeter Academy

Academy Ethics & Whistleblower Policy

Purpose: Phillips Exeter Academy is committed to maintaining the highest ethical standards, including complying with all applicable laws, regulations and PEA policies, and fostering an environment that is free from all forms of intimidation and retaliation. This document is one of a number in place to help ensure maintenance of the high ethical standards to which we all are committed. The Academy will endeavor to address appropriately all serious concerns brought to its attention about legal, financial, accounting or business related improprieties. If improper conduct is found to have occurred, the Academy will take appropriate corrective action.

Reporting Process: Because PEA encourages high standards of conduct, any employee, trustee, officer, consultant or volunteer ("Reporter") who has a good faith belief that financial, accounting or business related wrongdoing or unlawful or unsafe activity has occurred or will occur may bring his or her concern to the administration without fear of harassment or retaliation. The disclosure of such information is sometimes known as "whistle blowing." Such concerns may be reported to and one of the following individuals: the Chief Financial Officer at 603-777-3443, the Director of Human Resources at 603-777-3447, the Dean of Faculty at 603-777-3405 or the Chair of the Audit Committee at 780-420-4020.

Additionally, PEA has contracted with EthicsPoint, a firm that provides ethics hotline services to a variety of organizations, to act as an independent intermediary for the reporting of concerns about financial, accounting or business related wrongdoing. If a reporter is uncomfortable discussing a complaint with the Chief Financial Officer, the Director of Human Resources, the Dean of Faculty, or the Chair of the Audit Committee, he or she should feel free to use EthicsPoint to report concerns. Such complaints can be reported either by phone at 888-572-8028 or on the web at www.ethicspoint.com. EthicsPoint will take anonymous reports and will also ensure that the information is reviewed by administrators other than those, if any, against whom allegations have been made.

PEA has other policies in place which contain specific complaint and reporting procedures such as its harassment and discrimination policies. To the extent employees have complaints of violation of other policies, their concerns should be addressed in accordance with the procedures set forth in those other policies or procedures.

Anonymity: Reporters are encouraged to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to the likelihood of confirming the allegation from attributable sources.

Prohibition against Retaliation: Reporters who raise concerns pursuant to this policy are protected from retaliation. PEA expressly prohibits any form of retaliation against individuals who in good faith report suspected violations of law, cooperate in governmental hearings, inquiries or investigations, or refuse to carry out illegal directives. PEA will not discharge, demote, suspend, threaten, harass, or in any manner discriminate or retaliate against anyone because that person has made a report consistent with this policy. Anyone who engages in such prohibited retaliatory conduct will be subject to disciplinary action up to and including possible termination of employment. Any conduct which is perceived as retaliatory should be reported immediately in accordance with the reporting procedure outlined above.

Investigation and Resolution: If the Academy receives a report of alleged improper conduct pursuant to this policy, it will investigate the matter promptly and thoroughly. All employees are expected to cooperate fully with any investigation. Failure to cooperate will be grounds for discipline up to and

including possible termination of employment. Reporting improper conduct will not absolve the "whistleblower" of personal responsibility if he or she participated in the wrongdoing. If improper conduct has in fact occurred, the Academy will address the issue in a manner that reflects the high ethical and legal standards to which we are all committed as members of the PEA community.

Acting in Good Faith: Anyone reporting a suspected violation of law or PEA policy must be acting in good faith and have reasonable grounds for suspicion of illegal, dishonest or inappropriate activity. Allegations that prove to have been made maliciously, recklessly or with knowledge that the allegations are false will be viewed as a serious disciplinary offense and may result in disciplinary action, up to and including termination of employment or dismissal from a current position.