

POLICIES

WHISTLEBLOWER POLICY

Noble and Greenough School is committed to the highest standards of lawful and ethical practice in the conduct of its activities. The School requires that its Trustees, employees and consultants ("School Personnel") conduct themselves in a manner that complies with all applicable laws and policies. Set forth below is the School's policy with respect to reporting in good faith concerns about the legality or propriety of actions or plans involving the School.

Reporting Concerns:

A person who has a good faith concern that an action involving the School violates applicable law, policies or ethical standards should report that concern in accordance with this policy.

Types of Concerns:

The types of concerns that should be reported include, but are not limited to, the following:

- Improper accounting
- Financial reporting that is intentionally misleading
- Improper or undocumented financial transactions
- Improper destruction of records
- Improper use of assets
- Providing false information to, or withholding material information from the School's auditors or Trustees
- Theft

- Any other improper occurrence regarding funds, financial procedures, or reporting

Procedures for Reporting:

To assure School personnel of the confidentiality of their complaints and the commitment of the School to this policy, the School has contracted with an independent organization to receive reports under this policy on a confidential basis. School personnel desiring to report on that basis should contact the following person:

Beth Reilly, Chairperson Nobles Board of Trustees

Phone: 617-367-9879

Email: beth.reilly@wilmerhale.com

If an individual does not require confidentiality for purposes of reporting a concern, a report may be filed, verbally or in writing, with the individual's supervisor or with the Head of School. A report received by a supervisor shall be forwarded promptly to the Head of School.

Action Taken:

The person indicated above will transcribe all reports received by it and forward them to a designated person or persons at the School. While an individual reporting a concern will be known to this person, that person's identity will not be reported to the School. At least once each year, the Head of School shall provide a report to the Board of Trustees as to reports received and the disposition of each.

The School will not discharge, threaten, or discriminate against any School personnel in any manner for any reporting in good faith as to a perceived violation of law, policy, or ethical standards. The School will impose disciplinary measures on anyone who threatens or retaliates against

any person who makes such a good faith report.

Exclusions:

Employee Grievances. This policy is not meant to replace grievance procedures in the School's employee handbook. Those procedures address work-related problems and complaints arising from the interpretation and application to the staff member of the School's personnel policies or procedures.

Abuse or Neglect. This policy does not apply to reports of suspected abuse or neglect of individuals who are served by the School and who are under the age of eighteen or are disabled, or elderly. Instead, reporting of suspected abuse or neglect is governed by the School's Harassment Policy.