



*We support your efforts to learn, earn. and live well.*

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Intergenerational Learning and Cross-Cultural Connections  
MANOS Dual Language Early Childhood Education Program & VESEB Adult Learning Program  
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(315) 667-3011      [www.partnerscnv.org](http://www.partnerscnv.org)      [info@partnerscnv.org](mailto:info@partnerscnv.org)

## **Partners in Learning, Inc. Whistleblower Policy & Procedure**

Partners in Learning, Inc. (PIL) requires its Board Directors, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. PIL requires that Board Directors, employees and volunteers comply with all applicable laws and regulations and practice honesty and integrity in fulfilling their job duties.

PIL encourages Board Directors, employees and volunteers to raise serious concerns internally so that it can address and correct inappropriate conduct and actions as soon as possible. It is the responsibility of all Board Directors, employees and volunteers to report concerns about violations of PIL's code of conduct or suspected violations of law or regulations that govern PIL's operations.

PIL has an open-door policy and encourages Board Directors, employees and volunteers to share their questions, concerns, suggestions or complaints.

- PIL asks Board Directors and people from the public to share their questions, concerns, suggestions or complaints with the Executive Director, Board Chair or anonymously by submitting a form in the PIL Suggestion Box.
- PIL asks employees and volunteers to share their questions, concerns, suggestions or complaints with their Supervisor, the Executive Director, the Board Chair or anonymously by submitting a form in the PIL Suggestion Box.

PIL Board Directors, employees and volunteers are required to report complaints or concerns about suspected or known ethical and legal violations in writing to the PIL Compliance Officer (or another Board Member if it relates to the Board Chair). The PIL Board Chair serves as PIL's Compliance Officer, and as such is responsible for investigating all reported whistleblower complaints.

PIL's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported or suspected violation.

The Compliance Officer shall immediately notify the Members of the PIL Board Finance / Audit Committee of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the Committee until the matter is resolved.

The Compliance Officer will work with Members of the PIL Executive Committee to investigate any other whistleblower claims and to oversee implementation of any corrective action that might be warranted.

The Compliance Officer will advise the Executive Director and/or Board Directors of all complaints and their resolution.

Anyone filing a written complaint concerning a violation or suspected violation 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.

PIL will maintain complainant confidentiality in the reporting of violations or suspected violations, to the fullest extent allowed by law.

PIL will not retaliate, intimidate, coerce, threaten, discriminate, or otherwise take an adverse action against a Board Director, employee or volunteer who files a good faith complaint or who participates in an investigation. PIL prohibits its Board Directors and employees from retaliating against another Board Director, employee or volunteer for filling a complaint and/or participating in an investigation.

If a Board Director, employee or volunteer believes they have been retaliated against for filling a complaint or assisting in an investigation, they should notify the PIL Compliance Officer immediately (or another Board Member if it relates to the Board Chair).

Any Board Director, employee or volunteer who violates this policy or who retaliates against a whistleblower will be subject to disciplinary action, up to and including termination or removal from the BOD.

I have read and agree to act in accordance with this policy.

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Board Director Signature	Printed Name	Date
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Executive Director Signature	Printed Name	Date
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