

Whistleblower Policy

Introduction

First Graduate adopted this Whistleblower Policy (this “Policy”) to facilitate open and honest communications concerning its governances, finances, and compliance with law, policy, and ethical principles. This Policy applies to all directors, officers, employees, and volunteers of First Graduate (collectively, “First Graduate associates”).

Policy

Every First Graduate associate is encouraged to report under this Policy any concerns about any First Graduate activities that he or she believes, in good faith, to be illegal, unethical, questionable, or contrary to First Graduate policies. These matters include, without limitation, inappropriate behavior towards students or associates; suspected fraud, theft, or embezzlement; accounting, internal controls, or auditing irregularities such as undocumented transactions or misleading financial reporting; improper financial transactions or use of First Graduate assets; kickbacks; improper concealment or destruction of First Graduate records; and violations of First Graduate’s Conflict of Interest Policy and of law.

Reporting a concern

If at any time a First Graduate associate has such a concern, the First Graduate associate may raise the concern directly by speaking with the Executive Director. Alternatively, if he or she is not comfortable speaking with the Executive Director or does not believe the concern has been properly addressed, the First Graduate associate may report the concern to the President, Director of Operations, or any member of the [Finance/Executive/Internal] Committee. [Reports may be submitted anonymously in writing by depositing the report in the designated drop box at First Graduate’s office.] **[Note to First Graduate: Please conform as appropriate.]**

Confidentiality

First Graduate will treat a report of unethical or illegal conduct as confidential, subject to and limited by the need to investigate and prevent or correct the action, and the need to comply with applicable laws. Reporting individuals are expected to act in good faith, cooperate in internal investigations of misconduct, and provide truthful information in connection with any official inquiry or investigation. First Graduate will investigate anonymous reports to the extent it deems appropriate.

Non-retaliation

A First Graduate associate making a report will not be discharged, demoted, disciplined, harassed, or discriminated against for making a report in good faith under this Policy. Any First Graduate associate who retaliates against an individual for reporting or participating in an investigation of illegal or improper activity may be subject to disciplinary action including, but not limited to, termination of employment.

No impact on employment status

This Policy is not an employment contract and does not modify the employment relationship between First Graduate and its employees. It does not change the fact that employees of First Graduate are at-will employees.

Other laws and policies

This Policy is intended to supplement and not supersede federal and state laws, including, without limitation, Section 1102.5 of the California Labor Code and Section 1107 of the Sarbanes-Oxley Act, or First Graduate policies including, without limitation, those relating to harassment, discrimination, or personnel.