

WHISTLEBLOWING POLICY

A. PURPOSE

International Schools Partnership and the Thomas Jefferson Institute are committed to delivering a high-quality education while expecting all employees to meet high standards. To maintain these standards, it is vitally important to maintain a culture of openness and responsibility. Therefore, this policy seeks to:

- Encourage employees to report irregular situations that occur within the school without fear of retaliation.
- Assure employees that such reports will be taken seriously.
- Provide information on how to file a complaint and explain how the General Director will proceed.

Collaborator: Every member hired by the Thomas Jefferson Institute, regardless of their position.

1. Scope and Objectives

The Thomas Jefferson Institute aims to:

- Outline the system and procedures that we have to ensure that students are safe within the school.
- Raise awareness in all employees about issues related to safeguarding / protection of minors, as well as defining their roles and responsibilities when reporting possible cases of abuse and / or risk.
- Ensure effective communication between employees on issues related to the safeguarding / protection of the minor and the reporting of irregularities.
- Establish effective procedures for collaborators or external providers who find a situation related to the safeguarding / protection of minors in our students, as well as a situation related to bad practices by collaborators.

B. SCOPE

This policy applies to all collaborators and suppliers of the Thomas Jefferson Querétaro Institute.

C. DEFINITIONS

1. Whistleblowing

ISP recognizes that students cannot be expected to report unsafe situations if the adults around them do not. All collaborators and suppliers must be aware of their responsibility to report actions or attitudes of colleagues that go against the well-being of a student.

A complaint can be filed against a partner or supplier at any time. It is important that any report is dealt with seriously and following the appropriate procedures.

A complaint is different from a complaint and can be defined as follows:

- When someone has behaved in a way that has hurt or may hurt a minor emotionally, physically or sexually.
- When someone has possibly committed an offense of a criminal nature against a minor and / or a collaborator.
- When someone has behaved in a way that is a risk to the physical, emotional and / or sexual health of a minor.

- Inappropriate use of school funds and / or financial mismanagement
- Fraud and corruption
- Breach of contract
- Intentional safeguarding of information related to any of the above conditions.

D. PROCEDURES

In the event of a complaint against a collaborator or supplier, you should:

- Go to your closest copy center and request a copy of the Concern Form.
- Fill out the Register by hand, being as specific as possible (including date and time) with the objective observations that raise your suspicion.
- Deliver the Registry in person and only to the General Directorate. It cannot be delivered through third parties.
- In a situation where it is not possible to deliver the Registry in person, for example, while working remotely, the Registry must be filled out by hand, scanned and sent directly to the email direccion_general@itjgro.edu.mx from the institutional email.

The complaint of irregularities will be investigated by the General Director unless it is a criminal situation, in which case the pertinent local authorities will be notified to carry out the investigation. In all cases (criminal or not), the General Management and the Regional Human Resources group will be notified as soon as possible of the situation. In the event that the complaint is against an officer, the Regional Group of School Directors and the Regional Director of Human Resources will be informed.

No action to investigate a report of this nature should be taken before consulting with the Regional Director of Human Resources, with whom the best course of action will be decided. If deemed necessary, the employee in question will be suspended. A suspension is a neutral act and in no way implies that the person is guilty of any action.

It is recognized that taking this action may raise concern, so the school will do everything possible to balance the interests of the stakeholder and those that are necessary to keep students safe. The school will consult the Regional Director of Human Resources before acting and will carry out the legal guidelines involved in matters of this nature.

Knowing the expectations set in the code of conduct for employees and having training in safe practices will reduce the possibility of a complaint being generated.

Whoever reports an irregularity and considers that they have been victimized for having reported, can carry out a formal complaint with your immediate employer giving details about why they consider that they have been treated incorrectly and how they consider that this treatment is related to their complaint.

It is the employer's responsibility to ensure that no person who reports an irregularity is victimized by such action.

Confidentiality

The school understands that you may feel insecure about reporting a situation such as those mentioned that involves a collaborator. Once a complaint is made, only the General Directorate and / or the Regional Director of Human Resources will know the information of who made the complaint.

Anonymous Reports

It is recognized that the purpose of this policy is to allow individuals to report situations in a safe environment where they will not be retaliated against or victimized. Although it can be very difficult for some people to

approach and make a report, it is encouraged that no report is anonymous, since an anonymous report has much less weight and is more difficult to investigate because it has less credibility. The decision to investigate or not an anonymous complaint is left to the General Director. This decision will take into account the seriousness of the reported event, the credibility of what is reported and the possibility of confirming said complaint through other sources.

Whistleblower protection

All reports of wrongdoing will be taken seriously and a decision will be made as to whether or not they will be investigated. The General Director will be responsible for sharing the pertinent information with the complainant by advancing the investigation. The final result of such an investigation will not always be shared with the complainant.

Confidentiality will be maintained and no action will be taken against whoever makes a report in the correct manner.

The school will not tolerate abuse of this Policy. Reports made maliciously, false reports or with the intention of generating a consequence in a third party, may result in a disciplinary sanction. Making inappropriate use or for defamation purposes of this action will be sanctioned according to the ISP Disciplinary Policy.

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