

DETROIT EDUCATIONAL TELEVISION FOUNDATION

WHISTLEBLOWER POLICY

STATEMENT OF NEED:

The Sarbanes-Oxley Act of 2002 (Act) seeks to enhance corporate governance and to ensure the accuracy of financial reporting. The Act creates new measures that deal with financial reporting, conflicts of interest, internal ethics and oversight of accounting firms that perform public company audits. Although, as a not-for-profit entity, Detroit Educational Television Foundation (DETF) is not governed by the Act, DETF recognized the objectives of the Act and is adopting this statement of intent and is creating the following procedures in order to establish a conduit for employees to communicate concerns about potential wrong doing or other improper activities directly to the Compensation and Finance Committees through its designee.

STATEMENT OF INTENT:

All DETF employees are encouraged to report any improper activities to the Compensation and Finance Committees of the Board of Trustees. Improper activities are defined as any activity by an organization employee that may jeopardize the accuracy of financial reporting, represents a conflict of interest, or violates internal ethics policies.

PROCEDURES

Reporting Improper Activities

1. The Compensation Committee of the Board of Trustees has authorized the use of an outside third-party company, called The Network, to provide an anonymous, confidential service for employees to call that is staffed 24 hours a day, 7 days a week, to report inappropriate corporate behavior.
2. Each employee is provided with a brochure from The Network that outlines the necessary reporting procedures.
3. The Network will speak to each caller, ask appropriate questions, document the situation in detail, and assign a report number for follow-up purposes. The Network will relay each report taken to the Director of Human Resources, who in turn, will direct the information appropriately to those members of executive management with a legitimate need-to-know; or others that may be involved with any investigation, including appropriate members of law enforcement or other individuals or agencies pursuant to a subpoena or other legal process of discovery. The Director of Human Resources will also notify the Chairperson's of the Compensation and Finance Committees of the Board of Trustees of all reports received.
4. The Director of Human Resources will document and maintain secured records of all reported activities and any documentation relating to the investigation of these activities. The Director of Human Resources will maintain any and all information received in strict confidence.
5. Upon completion of the preliminary investigation, the Director of Human Resources will notify the Compensation and the Finance Committee Chairpersons of results and recommended actions.
6. The Chairpersons of the Compensation and Finance Committees will review the investigation findings, and determine what, if any, further action is required.

Protection from Retaliation

No employee will be retaliated against for submitting reports, in good faith, that allege improper activity or wrong-doing. If an employee believes they have been retaliated against, he or she should contact the Director of Human Resources, who will investigate the alleged retaliation. If the investigation confirms that the employee was retaliated against because of his or her report(s), DETF will take appropriate corrective actions.