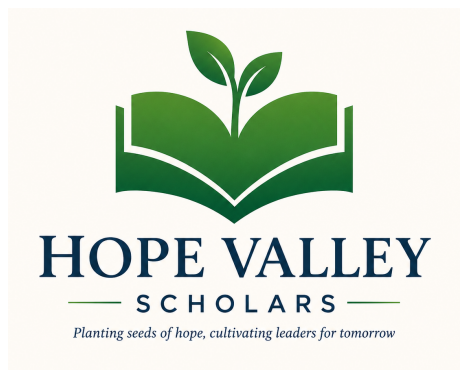




HOPE VALLEY SCHOLARS INC.

Whistleblower and Organizational Complaint Policy

Protected reporting, impartial review and no retaliation.

This policy provides protected reporting channels for suspected illegality, financial misconduct, retaliation, serious policy violations and other organizational integrity concerns.

OUR COMMITMENT: Hope Valley Scholars applies this document to the programs, people and activities within its scope. Questions or requests for an accessible copy may be sent to the contact information below.

Version	1.0
Policy owner	Board Chair, Secretary and alternate disinterested director
Effective date	01/01/2026
Review cycle	Annual
Website address	https://www.hopevalleyscholars.org/Documents/pdf/Hope%20Valley%20Scholars%20Whistleblower%20and%20Organizational%20Complaint%20Policy.pdf

Organization: Hope Valley Scholars Inc. | U.S. 501(c)(3) public charity | EIN 41-2924425

Contact: info@hopevalleyscholars.org | +1 (302) 898-6006 | <https://www.hopevalleyscholars.org>

1. Commitment and scope

Hope Valley Scholars Inc. encourages directors, officers, employees, volunteers, mentors, contractors, scholars, families, donors and partners to report credible concerns in good faith. This policy covers suspected fraud, theft, diversion, bribery, falsified records, misuse of restricted funds, serious conflicts, retaliation, obstruction, data misuse, safeguarding concealment, unlawful discrimination and other serious policy or legal violations.

Routine applicant service concerns and scholarship appeals ordinarily use the Applicant, Scholar and Parent Complaint and Appeals Policy. An issue involving organizational misconduct, retaliation or concealment may be handled under both policies.

2. Reporting channels

Reports may be submitted to the Board Chair or Board Secretary through the designated confidential address, or initially through info@hopevalleyscholars.org or +1 (302) 898-6006 for secure routing. An alternate disinterested director will receive a report involving the Chair, Secretary or primary recipient.

Anonymous reports will be considered to the extent the available information permits. A reporter should provide dates, people, transactions, records, witnesses, safety concerns and how the information became known, while avoiding unlawful access or removal of records.

EMERGENCY AND SAFEGUARDING: Immediate danger or suspected child abuse requires prompt contact with the appropriate emergency or child-protection authority and the safeguarding process. Do not wait for an internal investigation.

3. Good-faith reporting and non-retaliation

A good-faith report is based on information the reporter reasonably believes may be true, even if the concern is not substantiated. Retaliation, threats, intimidation, harassment, exclusion, adverse assignment, scholarship interference or other punishment for a good-faith report or participation is prohibited.

A knowingly false allegation or deliberate fabrication may lead to corrective action. A mistaken, unsubstantiated or incomplete good-faith report is not misconduct.

4. Intake and protective action

- Acknowledge receipt when contact information is available and safe.
- Assess immediate safety, safeguarding, privacy, financial loss, evidence preservation, legal notice, insurance and conflicts.
- Protect the reporter and affected persons from retaliation and unnecessary disclosure.
- Assign a qualified impartial reviewer; use outside counsel, accounting, safeguarding or technical expertise when warranted.
- Do not notify an implicated person prematurely when doing so may create danger, retaliation, evidence loss or obstruction.

5. Investigation and fairness

The reviewer shall define the issues, preserve relevant records, gather proportionate evidence and provide a person accused of misconduct a fair opportunity to respond when safe and lawful.

Confidentiality will be maintained to the extent reasonably possible, but cannot be guaranteed. Findings and corrective actions shall be reported to disinterested Board members with appropriate detail.

6. Outcomes

Possible actions include control improvement, repayment or recovery, corrected reporting, training, removal of access, discipline, contract remedies, removal from a role, safeguarding action, insurer notice, disclosure to affected persons or regulators, referral to law enforcement and legal action. The reporter may receive a closure notice but is not entitled to confidential personnel, scholar or investigation information.

7. Records and no obstruction

No person may destroy, alter, hide or direct another person to destroy a record to obstruct an investigation, audit, lawsuit, government matter or lawful request. A legal hold shall suspend ordinary destruction. Whistleblower files are restricted and retained under the Document Retention and Destruction Policy.

8. Board oversight

The Board or a disinterested committee shall receive status and closure information for material reports, monitor retaliation and verify corrective action. At least annually, the Board shall review de-identified trends, reporting access, timeliness, conflicts and policy effectiveness.

Appendix A - Protected report intake

Reporter name and safe contact, or anonymous

People, transactions, programs or records involved

What occurred, when and how the information became known

Immediate safety, retaliation, evidence or confidentiality concern

Supporting records and requested follow-up

Official reference

[IRS Instructions for Form 990, Part VI governance policies](#)

Document control: The current public version is maintained by Hope Valley Scholars Inc.; printed or downloaded copies may become outdated. **Related:** [Document Retention Policy](#) | [Complaint and Appeals Policy](#).

Version 1.0 | Effective 01/01/2026 | Next scheduled review: 01/01/2027.