The CEO has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates those fraudulent activities have occurred, the CEO will issue reports to appropriate designated personnel.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and senior management, as will final decisions on disposition of the case.

The CEO treats all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the CEO immediately and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect Synergy School of Tomorrow from potential liability.

Any employee identified in fraudulent activity will face legal action, up to and including immediate termination.

CODE OF ETHICS POLICY

The purpose of Synergy School of Tomorrow Code of Ethics and conflict of interest policy is to protect Synergy School of Tomorrow's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an Synergy School of Tomorrow employee, officer or trustee or might result in a possible excess benefit transaction.

- No employee of Synergy School of Tomorrow may receive any thing of economic value for assisting a person in a transaction with Synergy School of Tomorrow.
- No employee of Synergy School of Tomorrow is to receive any thing of economic value, other than the compensation and benefits from Synergy School of Tomorrow to which they are entitled for the performance of their duties and responsibilities of their office or position.
- No employee of Synergy School of Tomorrow is to receive a "finder's fee" *i.e.,* they cannot receive any thing of economic value from a person to whom they have directed Synergy School of Tomorrow's business.
- No employee of Synergy School of Tomorrow can participate in any transaction involving Synergy School of Tomorrow in which they have a personal substantial economic interest about which they should be reasonably expected to know.
- No employee of Synergy School of Tomorrow can bid on or enter any contract, subcontract or other transaction that is in the supervision or jurisdiction of Synergy School of Tomorrow, nor can any legal entity in which they have a controlling interest.
- No employee of Synergy School of Tomorrow can solicit or accept anything of economic
 walue as a gift or gratuity from any person if they know or reasonably should
 know that such person is seeking to obtain contractual or other business with Synergy
 School of Tomorrow or defeat of legislation by Synergy School of Tomorrow.

- No employee of Synergy School of Tomorrow of Synergy School of Tomorrow can solicit or accept anything of economic value as a gift or gratuity from any person is they know or reasonably should know that the person: (1) conducts operations that are contracted or purchased by Synergy School of Tomorrow; or (2) has substantial economic interests that may be substantially affected by the performance of nonperformance of their Synergy School of Tomorrow duties.
- No employee or member of Synergy School of Tomorrow of Synergy School of Tomorrow can abuse their position within the Synergy School of Tomorrow i.e., they cannot use the authority of their office or position to compel or coerce anyone to give them anything of value.

 Standards of Ethical Conduct

Synergy School of Tomorrow

(Adapted from the Code of Ethics of the Education Profession in Florida and Principles of Professional Conduct for the Education Profession in Florida)

Our school values the worth and dignity of every person, the pursuit of truth, devotion to excellence, acquisition of knowledge, and the nurture of democratic citizenship. Essential to the achievement of these standards are the freedom to learn and to teach and the guarantee of equal opportunity for all.

- Our primary concern is the student and the development of the student's potential.
 Employees will therefore strive for professional growth and will seek to exercise the best professional judgment and integrity.
- 2. Concern for the student requires that our instructional personnel:
- a. Shall make reasonable effort to protect the student from conditions harmful to learning and/or to the student's mental and/or physical health and/or safety.
- b. Shall not unreasonably restrain a student from independent action in pursuit of learning.
- c. Shall not unreasonably deny a student access to diverse points of view.
- d. Shall not intentionally suppress or distort subject matter relevant to a student's academic program.
- e. Shall not intentionally expose a student to unnecessary embarrassment or disparagement.
- f. Shall not intentionally violate or deny a student's legal rights.
- g. Shall not harass or discriminate against any student on the basis of race, color, religion,
- h. sex, age, national or ethnic origin, political beliefs, marital status, handicapping condition, sexual orientation, or social and family background and shall make reasonable effort to assure that each student is protected from harassment or discrimination.
- i. Shall not exploit a relationship with a student for personal gain or advantage.
- j. Shall keep in confidence personally identifiable information obtained in the course of
- k. professional service, unless disclosure serves professional purposes or is required by law.
- 4. Aware of the importance of maintaining the respect and confidence of colleagues, of students, of parents, and of the community, employees of our school must display the highest degree of ethical conduct. This commitment requires that our employees: a.

Shall maintain honesty in all professional dealings.

- b. Shall not on the basis of race, color, religion, sex, age, national or ethnic origin, political beliefs, marital status, handicapping condition if otherwise qualified, or social and family background deny to a colleague professional benefits or advantages or participation in any professional organization.
- c. Shall not interfere with a colleague's exercise of political or civil rights and responsibilities.
- d. Shall not engage in harassment or discriminatory conduct which unreasonably interferes with an individual's performance of professional or work responsibilities or with the orderly processes of education or which creates a hostile, intimidating, abusive, offensive, or oppressive environment; and, further, shall make reasonable effort to assure that each individual is protected from such harassment or discrimination.
- e. Shall not make malicious or intentionally false statements about a colleague.

Training Requirement

All employees, educational support employees, and administrators are required as a condition of employment to complete training on these standards of ethical conduct.

Reporting Misconduct by Instructional Employees and Administrators

All employees, educational support employees, and administrators have an obligation to report misconduct by instructional personnel and school administrators, which affects the health, safety, or welfare of a student. Examples of misconduct include obscene language, drug and alcohol use, disparaging comments, prejudice or bigotry, sexual innuendo, cheating or testing violations, physical aggression, and accepting or offering favors. Reports of misconduct of employees should be made to Mrs. Tatiana Castro, HR Liaison at (772) 801-5522 or humanresources2@synergyk12.com. Reports of misconduct committed by administrators should be made to Mrs. Destiny Khourie-Louisjin, District Administrator, at (772) 801-5522 or destiny.khourie@synergyk12.com. Legally sufficient allegations of misconduct by Florida certified educators will be reported to the Office of Professional Practices Services. Policies and procedures for reporting misconduct by instructional personnel or school administrators which affects the health, safety, or welfare of a student are posted in our employee workroom and on our Web site at www.synergymagnet.com

Reporting Child Abuse, Abandonment or Neglect

All employees and agents have an affirmative duty to report all actual or suspected cases of child abuse, abandonment, or neglect. Call 1-800-96-ABUSE or report online at: http://www.dcf.state.fl.us/abuse/report/.

Signs of Physical Abuse: The child may have unexplained bruises, welts, cuts, or other injuries; broken bones, or burns. A child experiencing physical abuse may seem withdrawn or depressed, seem afraid to go home or may run away, shy away from physical contact, be aggressive, or wear inappropriate clothing to hide injuries.

Signs of Sexual Abuse The child may have torn, stained or bloody underwear, trouble walking or sitting, pain or itching in genital area, or a sexually transmitted disease. A child experiencing sexual abuse may have unusual knowledge of sex or act seductively, fear a particular person, seem withdrawn or depressed, gain or lose weight suddenly, shy away from physical contact, or run away from home.

Signs of Neglect The child may have unattended medical needs, little or no supervision at home, poor hygiene, or appear underweight. A child experiencing neglect may be frequently tired or hungry, steal food, or appear overly needy for adult attention.

Patterns of Abuse: Serious abuse usually involves a combination of factors. While a single sign may not be significant, a pattern of physical or behavioral signs is a serious indicator and should be reported.

Liability Protections

Any person, official, or institution participating in good faith in any act authorized or required by law, or reporting in good faith any instance of child abuse, abandonment, or neglect to the department or any law enforcement agency, shall be immune from any civil or criminal liability which might otherwise result by reason of such action. (F.S. 39.203)

An employer who discloses information about a former or current employee to a prospective employer of the former or current employee upon request of the prospective employer or of the former or current employee is immune from civil liability for such disclosure or its consequences unless it is shown by clear and convincing evidence that the information disclosed by the former or current employer was knowingly false or violated any civil right of the former or current employee protected under F.S. Chapter 760. (F.S. 768.095)

SAFETY

Synergy School of Tomorrow is committed to providing the resources and manpower necessary to develop, implement, and administer safety procedures for the protection of its employees. All employees are expected to meet their responsibilities to make the safety procedures effective and productive. Periodic reviews of our safety procedures will be conducted by management to maintain its effectiveness.

Reporting Safety Issues

All accidents, injuries, potential safety hazards, safety suggestions and health and safety related issues must be reported immediately to your supervisor, School Leader and Human Resources. If an employee is injured and require emergency response, management will contact the response agency, if needed.

If an injury does not require medical attention, an Employer Report of Injury/Illness Form must still be completed in case medical treatment is later needed, and to ensure that any existing safety hazards are corrected. The employee's Claim for Worker's Compensation Benefits Form must be completed in all cases in which an injury requiring medical attention has occurred.