

RESULTS and RESULTS Educational Fund

Whistleblower Policy

Adopted by Board on April 20, 2009

General

RESULTS/RESULTS Educational Fund requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the RESULTS/RESULTS Educational Fund we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within RESULTS/RESULTS Educational Fund prior to seeking resolution outside RESULTS/RESULTS Educational Fund.

Open Door Policy for Reporting Violations

RESULTS/RESULTS Educational Fund has an open door policy and suggests that employees share their ethics questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if a director, officer or employee is not comfortable speaking with his/her supervisor or is not satisfied with the supervisor's response, encouraged to speak with a senior manager or Board Member whom he/she feels comfortable to approach. Supervisors, managers or Board Members are required to report suspected ethics violations to the RESULTS/RESULTS Educational Fund's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when an employee is not satisfied or is uncomfortable with following RESULTS/RESULTS Educational Fund's open door policy, individuals should contact RESULTS/RESULTS Educational Fund's Compliance Officer directly.

Compliance Officer

The RESULTS/RESULTS Educational Fund's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations

and, at his/her discretion, shall advise the Executive Director and/or the Executive Committee of the Board or Audit committee. The Compliance Officer has direct access to the Executive Committee or Audit committee of the board of directors and is required to report to the Executive Committee or audit committee at least annually on compliance activity. The RESULTS/RESULTS Educational Fund's Compliance Officer is the chair of the audit committee.

Accounting and Auditing Matters

The Executive Committee or audit committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Executive Committee or audit committee of any such complaint and work with the committee(s) until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as subject to disciplinary action.

Confidentiality

Violations or suspected violations must be submitted on a confidential basis by the complainant and may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will send to the complainant an acknowledgement of receipt of the reported violation or suspected violation within five business days. All reported violations will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Current Compliance Officer

Jan Twombly
President, The Rhythm of Business
(617) 965-4777
jan@rhythmofbusiness.com

RESULTS/RESULTS Educational Fund Management Staff
Joanne Carter, Executive Director