



## **Whistleblower Policy**

Drafted by:	Staff
Reviewed by:	Staff
Presented to Board:	N/A
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## **CHICAGO TEACHERS' PENSION FUND WHISTLEBLOWER POLICY**

The Chicago Teachers' Pension Fund (CTPF) has established the procedures in this Whistleblower Policy for the receipt, retention, investigation and treatment of complaints and concerns regarding fraud, ethics violations, accounting, internal accounting controls, auditing and other legal and regulatory matters. This policy applies to all employees, former employees, directors, officers, certain advisors, and contractors (collectively referred to throughout this policy as "employees") of CTPF. This policy also applies to members of the CTPF Board of Trustees. The purpose of this policy is to provide a means of reporting complaints and concerns regarding fraud, ethics violations, accounting, internal accounting controls, auditing and other legal and regulatory matters, in addition to the reporting means that may be provided in other CTPF policies and procedures, including the applicable Code of Conduct-Ethics Policy.

### **A. Scope of Matters Covered by the Policy**

The procedures set forth in this policy relate to complaints and concerns (referred to in this policy as "Complaints") of employees, trustees and other interested parties (each referred to in this policy as a "Complainant") regarding:

- (a) Accounting, internal accounting controls or auditing matters of CTPF;
- (b) Non-compliance with applicable federal or state legal and regulatory requirements, or any alleged breach of the CTPF Code of Conduct-Ethics Policy; and
- (c) Retaliation against employees and other persons who make good faith allegations under this Policy.

Note: The scope of this policy specifically excludes workplace concerns or complaints of discrimination, unlawful harassment (including sexual harassment) or bullying or retaliation related to complaints of discrimination. Such complaints should be reported using the complaint procedures set forth in the Employee Handbook at Section 9

### **B. Procedures for Submitting Complaints**

Complaints that are within the scope of this Policy may be directed to CTPF's Chief Legal Officer and/or Director of Internal Audit, or to CTPF's external Ethics/Fraud Hotline. Complaints may be submitted as follows:

- (a) in writing to Chicago Teachers' Pension Fund, Attn: Chief Legal Officer (or Director of Internal Audit), 425 S. Financial Place., Suite 1400, Chicago, IL 60605;
- (b) by calling the Fund's Ethics/Fraud Hotline at 855.900.0091 at any time; or
- (c) by accessing the Ethics/Fraud website at the following link: [www.lighthouse-services.com/ctpf](http://www.lighthouse-services.com/ctpf) and submitting a Complaint.

Any Complaints made to the Executive Director, to the Board of Trustees or to any individual Trustee shall be referred to the Chief Legal Officer and/or Director of Internal Audit. Complaints under this Policy will be treated as confidential, to the extent possible, and may be made anonymously. Complaints should be factual rather than speculative or conclusory, and should contain as much specific information as possible to allow for proper investigation or assessment.

The telephone hotline and website are managed by Lighthouse LLC (an outside, independent service provider) and allows any employee of CTPF or other interested party to submit a Complaint.

### **C. Treatment of Complaints**

All Complaints are taken seriously and investigated as warranted. The Chief Legal Officer and/or Director of Internal Audit will determine whether and how such Complaints will be investigated, or whether they should be referred to Human Resources or some other department of CTPF. The Chief Legal Officer and/or Director of Internal Audit will communicate the Complaints and related investigative outcomes, as necessary, to the President of the Board of Trustees and/or the Executive Director.

### **D. Results of Investigation**

Upon completion of the investigation of a Complaint:

- (a) the Chief Legal Officer and/or Director of Internal Audit shall report the results of their investigation to the Board President and/or Executive Director, as appropriate, and shall recommend corrective action, if any, that in their judgment is warranted; and
- (b) the Board President, Executive Director, Chief Legal Officer, or Director of Internal Audit, as deemed appropriate, may contact, to the extent appropriate and possible, each whistleblower complainant to inform him/her of the results of the investigation and what, if any, corrective action was taken.

No action will be taken against any complainant who makes a Complaint in good faith, even if the facts alleged are not confirmed by subsequent investigation. However, if a Complaint is found to be without substance *and* to have been made for malicious or frivolous reasons, the complainant could be subject to disciplinary action up to, and including, termination of employment in the case of an employee-complainant.

### **E. Retaliation is Prohibited**

- (a) CTPF prohibits retaliation against anyone who in good faith makes a Complaint in accordance with this Policy, cooperates in an investigation of an internal Complaint, or is involved in a governmental, regulatory or law enforcement investigation. Specifically, neither the CTPF nor any director, officer, employee, contractor, subcontractor, or agent of the CTPF will discharge, demote, suspend, threaten, harass or in any manner discriminate or retaliate, directly or indirectly, against any person who, in good faith, makes a Complaint or otherwise assists CTPF or any other person or group, including any governmental, regulatory or law enforcement body, in investigating a Complaint.

(b) Unless necessary to conduct an adequate investigation or compelled by judicial or other legal process, neither CTPF, nor any director, officer or employee of CTPF shall: (i) reveal the identity of any employee who submits a Complaint and asks that his or her identity remain confidential; or (ii) make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of any employee who submits a Complaint anonymously.

(c) Notwithstanding the foregoing, and notwithstanding any other confidentiality or non-disclosure agreement (whether in writing or otherwise, including without limitation as part of an employment agreement, separation agreement or similar employment or compensation arrangement) applicable to current or former employees, this Policy does not restrict any current or former employee from communicating, cooperating or filing a complaint with any U.S. federal, state or local governmental or law enforcement branch, agency or entity (collectively, a “Governmental Entity”) with respect to possible violations of any U.S. federal, state or local law or regulation, or otherwise making disclosures to any Governmental Entity, in each case, that are protected under the whistleblower provisions of any such law or regulation, provided that (i) in each case such communications and disclosures are consistent with applicable law and (ii) the information subject to such disclosure was not obtained by the current or former employee through a communication that was subject to the attorney-client privilege, unless such disclosure of that information would otherwise be permitted by an attorney pursuant to applicable attorney conduct rules, or otherwise. Any agreement in conflict with the foregoing is hereby deemed amended by CTPF to be consistent with the foregoing.