WASHINGTON GLOBAL PUBLIC CHARTER SCHOOL

Governance Policy Manual

Code of Ethics | Conflict of Interest | Financial Policies

September 22, 2026

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Approved: _____

Table of Contents

1. Introduction and Purpose

2. Governance Structure

3. Code of Ethics

4. Conflict of Interest Policy

5. Whistleblower Policy

6. Financial Policies

7. Indemnification and Liability

8. Policy Review, Amendment, and Adoption

Appendix A: Board of Trustees Roster (SY25-26)

Appendix B: Source Documents

1. Introduction and Purpose

Washington Global Public Charter School ("Washington Global," "the School," or "the Corporation") is a District of Columbia nonprofit corporation, incorporated February 25, 2014, governed by a volunteer Board of Trustees. Under the School's Bylaws, the Board is the Corporation's fiduciary, sets its policies, and holds ultimate decision-making authority over its administration, operation, and maintenance.

The Bylaws themselves call for this manual: Article VIII, Section 8.3 states that "the Board shall draft and implement a Policies and Procedures Manual," following the guidelines of the National Council of Nonprofits and the Center for Nonprofit Advancement. This Governance Policy Manual fulfills that requirement by consolidating the Board-level policies on ethics, conflicts of interest, and financial oversight that the Bylaws reference but leave to a separate document.

This manual sits alongside, and does not replace, the Bylaws. Where this manual and the Bylaws differ, the Bylaws control, and the discrepancy should be flagged for correction.

This manual applies to all Trustees, and, where noted, to the School's officers and to any individual serving on a Board committee with delegated authority.

Source: Washington Global Bylaws (posted at washingtonglobal.org/public-information, dated November, 2021), Sections 1.1, 3.1, and 8.3.

2. Governance Structure

2.1 Board Composition

The Bylaws set Board size at no fewer than seven and no more than fifteen Trustees, always an odd number. A majority of Trustees must reside in the District of Columbia, and two Trustees must be parents or guardians of enrolled students. Washington Global's Board currently has nine members, including four officers (Chair, Vice-Chair, Secretary, and Treasurer). The current roster is provided in full in Appendix A.

Source: Washington Global Bylaws, Sections 3.2-3.3; Std 8 - Washington Global Public Charter School Board Roster SY25-26.docx.

2.2 Terms of Service

Trustees serve staggered terms. The Bylaws set the founding Board's terms at three years for the initial group, two years for the second round, and one year for the final round and "each election thereafter," while separately capping service at no more than two consecutive three-year terms unless a majority of the Board approves an exception.

Source: Washington Global Bylaws, Sections 3.5 and 4.6.

2.3 Standing Committees

The Bylaws establish five standing committees:

- Executive Committee: oversees the Board's business and operational aspects and develops meeting agendas.
- Governance Committee: ensures the Board meets its duties, orients new Trustees, recommends Bylaws changes, and recruits and nominates Trustees.

- Finance Committee: oversees financial practices and policy, reviews budgets and financial statements, leads the audit process, and recommends the school budget for approval.
- Academic Accountability and Student Well-Being Committee: oversees academic accountability, student achievement, and compliance with DC and federal law.
- Outreach and Development Committee: leads community outreach and fundraising.

The Bylaws require this of the Board's initial Trustees specifically; they do not state whether the same requirement extends to Trustees elected afterward, though that appears to be the intent.

Source: Washington Global Bylaws, Section 3.20.

2.4 Meetings, Quorum, and Voting

The Board holds six regular meetings per year plus one annual meeting on or about May 15; special meetings may be called by the Chair or any three Trustees. Meeting notice must go out at least 72 hours in advance. A majority of Trustees constitutes a quorum, and Robert's Rules of Order govern meeting conduct except where they conflict with the Bylaws. Trustees may participate by phone and may vote by proxy submitted to the Chair in advance.

Source: Washington Global Bylaws, Sections 3.11-3.17.

2.5 Officer Duties

- Chair: sits on the Executive Committee, sets Board meeting structure and agenda, leads strategic planning, and signs contracts authorized by the Board.
- Vice-Chair: assists the Chair and performs the Chair's duties in their absence; sits on the Executive Committee.
- Secretary: posts Board agendas, takes minutes, ensures required information is signed and submitted to PCSB, and maintains the Bylaws and Articles of Incorporation.
- Treasurer: sits on and oversees the Finance Committee; provides the Chair monthly updates on budget, financial performance, and the audit process.

Source: Washington Global Bylaws, Sections 4.2-4.5.

2.6 Relationship to School Leadership

Day-to-day management is delegated to a CEO, who is a Board-selected employee responsible for carrying out the Board's policies. The Board evaluates the CEO's performance and may dismiss the CEO only by an 80% supermajority vote. The CEO is responsible for preparing and managing the annual budget, overseeing compliance reporting to PCSB and OSSE, and reporting regularly to the Board.

Source: Washington Global Bylaws, Article V; Job Title: Chief Executive Officer.docx.

2.7 The Board's Core Roles and Fiduciary Duties

Consistent with Board training materials from June 2026, the Board also understands its role through seven practical functions: setting and evaluating student outcomes (quarterly), monitoring the School Leader's compliance with policy (annually), approving and terminating contracts (annually), evaluating the School Leader (mid-year and final), overseeing and approving finances (monthly), setting and monitoring goals tied to charter renewal (annually), and developing the Board's own governance capacity (monthly). The same materials describe three fiduciary duties: Care (informed, good-faith

decisions), Loyalty (School interests first, conflicts avoided, confidentiality kept), and Obedience (operate within the charter, the law, and the Bylaws).

Source: 2026 Washington Global Board Training.pptx (Board Work Session, June 8, 2026).

3. Code of Ethics

The Bylaws require every Trustee to annually sign a statement affirming that they have received, read, and understood the Conflict of Interest policy set out in Article VI, have agreed to comply with it, and understand the Corporation's obligations as a tax-exempt organization. This annual statement is the School's formally adopted ethics acknowledgment for Trustees; see Section 4 below for the full Conflict of Interest policy it accompanies.

Source: Washington Global Bylaws, Section 6.3.

4. Conflict of Interest Policy

4.1 Board-Level Policy (Bylaws, Article VI)

The Bylaws require Washington Global to maintain a conflict-of-interest policy, adopted in compliance with the DC School Reform Act and the DC Nonprofit Corporation Act, to protect the Corporation's interest whenever a transaction or arrangement might personally benefit a Trustee. The policy supplements, and does not replace, applicable DC and federal law.

Duty to Disclose

A Trustee must disclose any actual or potential conflict of interest, and all material facts related to it, to the Board.

Determining Whether a Conflict Exists

The Board decides, at a Board meeting, whether a disclosed interest amounts to a conflict. The interested Trustee leaves the meeting while that determination is discussed and decided.

Addressing the Conflict

- The Chair may refer the matter to a sub-committee of Trustees to investigate and recommend a course of action.
- After due diligence, the Board determines whether a more advantageous transaction, free of the conflict, is reasonably available.
- If not, the Board determines whether the transaction is in the Corporation's best interest and is fair and reasonable, then votes under the Bylaws' normal voting rules on whether to proceed.

Violations

If the Board has reasonable cause to believe a Trustee failed to disclose a conflict, it informs the Trustee and gives them an opportunity to explain. After investigating, the Board determines whether a failure to disclose occurred and takes appropriate corrective action.

Annual Statements

Each Trustee must annually sign a statement affirming that they have received, read, and understood the Conflict of Interest policy; have agreed to comply with it; and understand that the Corporation must engage primarily in activities that further its tax-exempt purpose to preserve its federal tax exemption.

Periodic Reviews

The Corporation periodically reviews compensation and benefit arrangements for reasonableness, and reviews partnerships, joint ventures, and management arrangements to confirm they follow written policy, are properly recorded, reflect reasonable value, and do not create impermissible private benefit.

Source: Washington Global Bylaws, Article VI (Sections 6.1-6.4).

4.2 Existing Employee-Level Policy (Summary)

Under the current Employee Handbook, a conflict of interest exists whenever the professional, personal, or School interests of an employee, officer, Principal, consultant, volunteer, or contractor are at odds with the best interests of Washington Global. Employees are required to report conflicts to the Human Resources Department immediately upon discovery or suspicion. Examples identified in the Handbook include:

- An outside business interest that competes with Washington Global, such as serving on another school's board or as a consultant to another school.
- Involvement with an outside vendor or purchaser to Washington Global.
- Outside employment or contract work, including with other charter schools, that interferes with an employee's Washington Global responsibilities.
- A relative or person with a significant relationship to a Washington Global employee who has a business interest in a competing organization.
- Accepting a personal gift from a vendor that directly benefits the employee.

The Handbook also maintains a separate Employment of Relatives and Personal Relationships policy: close relatives, partners, or members of the same household may not hold positions with a reporting relationship to each other, and any employee who becomes involved in such a relationship with a supervisory component must inform management and Human Resources. Violations of the Conflict of Interest policy are treated as grounds for disciplinary action up to and including termination.

Source: Std 10/11 Employee Handbook (Standard Operating Procedures), Conflict of Interest Policy and Employment of Relatives and Personal Relationships sections.

4.3 Conflicting Interest and Interested Party Contracts (Board Level)

Washington Global's Board-approved Financial Policies & Procedures define and permit two categories of contract involving a Trustee's interest, provided they are disclosed and fair to the School: a Conflicting Interest Contract, where a Trustee holds a similar position with or has a financial interest in the other party, and an Interested Party Contract, involving a close relative of a Trustee, senior executive, or one of the School's three highest-paid employees, or a former employee, founder, or Board member. For such contracts at or above $25,000, standard procurement procedures apply and the conflict must be noted and described; for contracts below $25,000, Board minutes must show the contract was approved.

Source: Washington Global Financial Policies & Procedures, Section XI (Contracts).

5. Whistleblower Policy

5.1 Purpose

Washington Global's Code of Ethics and Conduct requires the CEO, officers, Principal, and employees to observe high standards of business and personal ethics. All Trustees, officers, and employees are expected to comply with the Code and to report violations or suspected violations.

5.2 No Retaliation

No Trustee, officer, or employee who reports a violation in good faith may face harassment, retaliation, or adverse consequences as a result. An individual who retaliates against a good-faith reporter is subject to disciplinary or governance action, up to and including termination of employment or removal from the Board.

5.3 Reporting

Concerns should first be raised through the School's open-door process: with a supervisor, or, if that is not appropriate, with Human Resources or a member of School leadership. Supervisors and managers are required to report suspected violations to the School's Compliance Officer, who is responsible for investigating reported violations. Suspected fraud, or concerns a reporter is not comfortable raising through the open-door process, should go directly to the Compliance Officer.

5.4 Confidentiality

Reports may be submitted confidentially or anonymously and are kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Allegations made in good faith that are not substantiated will not result in disciplinary action against the reporter; allegations found to have been made maliciously or with knowledge of their falsity are treated as a serious disciplinary matter.

Source: Std 10/11 Employee Handbook (Standard Operating Procedures), Whistleblower Policy section.

6. Financial Policies

6.1 Accounting Basis and Fiscal Year

Washington Global's fiscal year runs July 1 to June 30. The School uses accrual-basis accounting. The Accountant performs monthly cash reconciliations and an annual chart-of-accounts review, and the CEO reviews journal entries monthly.

Source: Washington Global Financial Policies & Procedures, Section II (Accounting), approved 10/1/24.

6.2 Budgeting

The Board defines Washington Global's broad goals and mission and, working with the CEO, approves annual objectives and the budget. The Board reviews actual-versus-budget performance at least quarterly, and the CEO explains any variance greater than five percent along with corrective action. Recent Board minutes document this cycle in practice: the FY26 budget was approved June 9, 2025, and the FY27 budget was approved May 27, 2026, both by roll-call vote.

Source: Washington Global Financial Policies & Procedures, Section III (Budgeting); Board minutes, June 9, 2025 and May 27, 2026.

6.3 Banking and Check-Signing Authority

- Opening or closing a bank account requires Board approval.
- Check-signing authority is held by the CEO, the Principal, and the Board Chair.
- Checks over $10,000 require two signatures; checks at or under that amount require one.
- Checks payable to "bearer" or "cash," checks signed in blank, and out-of-sequence checks are prohibited.
- Corporate credit cards may be issued with limits up to $10,000 without Board approval; limits above $10,000 require Board approval, and the Board must be notified whenever a card is opened or closed.
- Loans to employees or Board members are prohibited under all circumstances.

Source: Washington Global Financial Policies & Procedures, Sections IV-V (Banking, Cash Management).

Drafting note: The Bylaws also address check-signing authority, in Section 8.2, but that section is the one confirmed changed by the Board's November 2021 amendment. This manual follows the Financial Policies here, since that document is both more recent (approved October 2024) and specific to financial practice.

6.4 Contract Authority and Procurement Thresholds

Washington Global uses a tiered approval structure for purchases and contracts:

- Under $15,000: the CEO has signing authority, provided the contract is consistent with the School's mission; a list of newly approved contracts under $15,000 goes to the Board at the next meeting.
- $15,000 to under $25,000: the CEO informs the Board Treasurer and/or Chair before signing; these contracts are also listed in the next Board report.
- $25,000 and above: the full Board must approve by vote (which may be taken by e-mail or phone if needed), after the Finance Committee reviews the PCSB-required procurement package and makes an initial recommendation. The vote outcome, vendor name, and contract amount are recorded in the next month's minutes.

- Renewals over $25,000: the CEO informs the Finance Committee before signing, and the renewal is listed in the next Board report.

For contracts at or above $25,000, Washington Global also follows PCSB procurement rules: competitive bidding (with specific exceptions such as real property leases, sole-source contracts, and certain renewals), public notice in the D.C. Register and at least two newspapers at least 7 days before award, and submission of a complete contract package to PCSB within three days of award.

Source: Washington Global Financial Policies & Procedures, Section XI (Contracts).

6.5 Conflicting Interest and Interested Party Contracts

The Financial Policies define two categories relevant to Board-level conflicts:

- A Conflicting Interest Contract: a binding agreement between the School and a party in which a Board member holds a similar position or has a financial interest.
- An Interested Party Contract: a binding agreement with a party that has a close familial relationship with a Board member, senior executive, or one of the School's three highest-paid employees; with a party owned by such a person; or with a former employee, founder, or Board member (or a party owned by one).

Washington Global may enter into either type of contract as long as the relationship is disclosed to the Board and the contract is fair to the School. For such contracts at or above $25,000, standard procurement procedures apply and the Procurement Contract spreadsheet must note the conflict and describe the relationship. For contracts below $25,000, Board minutes must show the Conflicting Interest or Interested Party Contract was approved.

Source: Washington Global Financial Policies & Procedures, Section XI (Contracts), PCSB Guidelines for Specific Types of Contracts.

6.6 Ongoing Financial Oversight

The Board receives a financial report at least quarterly, in advance of the relevant meeting, and Board minutes show this happening on a more frequent, often monthly, basis in practice. Reported metrics consistently include Days of Cash on hand, Debt Service Coverage Ratio (DSCR), and gross margin, tracked against PCSB requirements. Recent examples: 259 days of cash and a 3.15 DSCR in June 2025; 323 days of cash and a 2.45 DSCR in February 2026. Independent audits are completed annually by a Board-selected accounting firm, reviewed by the Finance Committee, and submitted to the Board for approval; the annual IRS Form 990 is reviewed by the Board in draft before filing.

Source: Washington Global Financial Policies & Procedures, Section II (Financial Statement Preparation and Distribution) and Section XVII (Annual Timeline); Board minutes, June 9, 2025; June 12, 2025; February 19, 2026; May 27, 2026.

6.7 Insurance and Record Retention

The CEO and the relevant Board committee review all insurance coverage annually before renewal, including General Liability, Directors and Officers, Umbrella, Property/Lease, Auto Liability, and Workers' Compensation. Coverage amounts are shared with the Board as part of the annual budget submission. The Financial Policies set a longer list of permanent records, including Articles of Incorporation, Bylaws, Board minutes, personnel and contract files, legal matters, audit reports, and tax filings; most other financial and procurement records are retained for five years.

Source: Washington Global Financial Policies & Procedures, Sections XIII-XIV (Insurance, Record Retention).

6.8 Amendments and Annual Financial Deadlines

Any change to the Financial Policies & Procedures requires Board approval; the CEO is responsible for ensuring approved changes are reflected and posted on the School's website. The manual sets an annual deadline calendar: the Finance Committee engages the auditor by June 30 and notifies the Board by the July meeting; the audit is completed and presented for Board approval by the November meeting; the Form 990 is completed and reviewed by the Board by November 15; a draft budget goes to the March Board meeting; the final budget is presented for Board approval at the May meeting; and the approved budget is submitted to PCSB by June, or as PCSB otherwise designates.

Source: Washington Global Financial Policies & Procedures, Sections XVI-XVII.

6.9 External Financial Support and Compliance Reporting

Washington Global also contracts with EdOps, a charter-school financial management firm, whose advisor presents the annual budget and periodic financial reports directly to the Board. The CEO is responsible for overseeing submission of the School's finance and operations compliance reports to PCSB and OSSE, and for serving as the School's liaison to both agencies.

Source: Board minutes, June 13, 2024; June 9, 2025; May 27, 2026; Job Title: Chief Executive Officer.docx.

7. Indemnification and Liability

The Corporation indemnifies Trustees, Officers, employees, and agents for reasonable expenses (including attorney fees, judgments, fines, and settlement amounts) incurred defending a civil or criminal action arising from their service to the Corporation, except where the Board finds the individual acted in bad faith or engaged in criminal conduct, gross negligence, or willful misconduct. Except as required by law, Trustees, Officers, employees, and agents are not personally liable for the Corporation's debts, liabilities, or obligations. The Corporation maintains adequate liability insurance covering Trustees, Officers, employees, and agents.

Source: Washington Global Bylaws, Article VII (Sections 7.1-7.3).

8. Policy Review, Amendment, and Adoption

The Bylaws set their own amendment standard: they may be amended at any Board meeting by a vote of at least two-thirds of Trustees then in office, and must be reviewed at least once every two years, with the review date documented. This manual, as a Policies and Procedures document contemplated by Bylaws Section 8.3 rather than the Bylaws themselves, should be reviewed on a similar cadence and amended by ordinary Board vote as needed to reflect changes in law, PCSB requirements, or School practice.

Source: Washington Global Bylaws, Section 8.4.

Adoption Record

Version	Date	Approved By	Notes
Draft 1	September 2, 2026	—	Initial draft prepared for Board review; not yet adopted
Approval		Board of Directors	

Appendix A: Board of Trustees Roster

Trustee	Officer Role	Affiliation
Teresa R. Curristine, Ph.D.	Chair	Senior Economist, IMF
Carlos Ardilla	Vice-Chair	Attorney, Latham & Watkins
Linda Brown	Secretary	Parent Representative and Housing Counselor, Urban League
Candice Cloos Haney, Ed.D.	Treasurer	Washington Global Co-Founder (non-employee)
Elizabeth Shook Torres, Ed.D.	Trustee	Washington Global Co-Founder / CEO
Vanessa Harvey-Lykes	Trustee	Special Ed Specialist
Kesha Hillary	Trustee	Parent Alumni
Erin Austin	Trustee	Parent Alum Representative
Janille Thompson	Trustee	Parent Alum Representative
Monique Conquest	Trustee	Parent Representative
Jasmine Groce	Trustee	Parent Representative

Source: Std 8 - Washington Global Public Charter School Board Roster, washingtonglobal.org/board-of-trustees/

Appendix B: Source Documents

- Washington Global Bylaws, dated January 19, 2021 (posted publicly at washingtonglobal.org/public-information)
- Washington Global Board Meeting Minutes, November 16, 2021
- Washington Global Financial Policies & Procedures, Board-approved October 1, 2024
- Std 10/11 Employee Handbook (Standard Operating Procedures) — Conflict of Interest, Employment of Relatives, and Whistleblower policies
- Std 8 - Washington Global Public Charter School Board Roster (posted publicly at washingtonglobal.org/board-of-trustees/)
- 2026 Washington Global Board Training.pptx (Board Work Session, June 8, 2026)
- Job Title: Chief Executive Officer.docx
- Board meeting minutes, September 2023 through May 2026, including budget votes on June 13, 2024, June 9, 2025, and May 27, 2026