

## I. Purpose and Scope

Arsenal Performing Arts Inc (“APA”) requires all directors, volunteers, employees and student members to act ethically, practice honesty and integrity, and comply with all applicable laws, regulations and ordinances.

APA hopes that all will feel free to raise concerns with APA. APA recognizes the need to provide a mechanism for the confidential and anonymous submission of such concerns in order to provide APA full opportunity to investigate and address potential violations of policy, law, or ordinance.

The purpose of this Whistleblower Policy is to establish policies and procedures for:

- Submitting concerns from student members, employee, volunteers, directors, and other stakeholders on a confidential and anonymous basis regarding anything against the policies of the organization, including but not limited to:
  - Unsafe practices or activities which unnecessarily endanger health or safety;
  - Bullying or harassment;
  - Staff and student member conduct;
  - Legal or regulatory violations;
  - Conflicts of interest;
  - Acceptance, provision, or solicitation of bribes or kickbacks;
  - Questionable business ethics;
  - Questionable accounting or auditing matters;
  - Other actions which potentially compromise the integrity of CDC
- The receipt, retention and treatment of concerns raised; and
- The protection of individuals raising concerns, and their families, from retaliatory actions.

## II. Reporting Responsibility

- Every director, volunteer, member and employee of APA and its affiliates has an obligation to report issues as listed in Section I above.
- Reports shall be made to the Executive Director and Vice President of APA’s Board of Directors (the “Board”).
- To ensure a confidential forum for reporting concerns, complaints and issues, APA has established a mechanism on its website located at

ArsenalPerformingArts.org/whistleblower, to enable anyone to send an anonymous message directly to both the Executive Director and Vice President of the Board.

- While a report may be submitted anonymously, the reporting person should understand that anonymity might impede APA's ability to conduct a complete investigation.
- Should the Executive Director and/or Vice President of the Board be potentially involved in the reported issue, such issue shall be reported to any member(s) of the Board.

### **III. Investigation**

- On a case-by-case basis, the Board shall determine appropriate action. This may include appointing a committee of Board members to conduct an investigation, report the findings of such investigation back to the Board, and recommend appropriate corrective action.
- The Board shall appoint a Compliance Officer on an ad hoc basis to coordinate investigative and procedural activities.

### **IV. Retaliation**

APA will not retaliate, and prohibits retaliation by its directors, volunteers, student members, employees and representatives, against anyone who makes a report in good faith under this Whistleblower Policy.

APA reserves the right to take action against anyone who makes a report based upon false or misleading information, or without a reasonable basis for believing any wrongdoing has occurred.

### **V. Employee Responsibilities**

Nothing in this Whistleblower Policy is intended to abrogate any duties APA employees owe APA, under any applicable laws, regulations or ordinances, to disclose, report violations (or suspected violations) of law or policy, cooperate fully in any investigations, including investigations of harassment, or to fulfill their duty of loyalty to APA.