



Ascend Performing Arts Whistleblower Policy

I. Purpose and Scope

Ascend Performing Arts, Inc. (“APA”) requires its directors, officers, volunteers, employees, and members of its affiliate ensembles to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. It is an expectation that employees and representatives of APA practice honesty and integrity and comply with all applicable laws, regulations and ordinances while fulfilling their responsibilities.

It is APA’s intent to encourage and provide an atmosphere wherein everyone involved in the organization’s activities understands their obligations to raise concerns regarding anything that would adversely affect APA’s ability to effectively uphold standards of good governance, manage risks, and address any potential wrong-doing that threatens the operations or members of the organization. The purpose of this Whistleblower Policy is to establish policies and procedures for the submission of concerns from employees, directors, officers, members, volunteers, and other stakeholders on a confidential basis regarding matters that are in violation of policies of the organization, including but not limited to:

- Questionable accounting or auditing matters;
- Questionable business ethics;
- Conflicts of interest;
- Acceptance, provision, or solicitation of bribes or kickbacks;
- Legal or regulatory violations;
- Unsafe practices or activities which unnecessarily endanger health or safety;
- Harassment, as defined in Section V, including hazing or bullying; and
- Other actions which potentially compromise the integrity of Ascend Performing Arts, Inc.
- Sexual harassment, as defined in Section V;
- The receipt, retention, and treatment of concerns raised; and

- The protection of individuals who raise concerns 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.
- A confidential and documented method for reporting concerns, complaints, and/or issues is provided on APA's website, www.AscendPerformingArts.org. The application will allow anyone to send a message (anonymously, if so desired), directed to the Director, COO and Board Chair (see exception below).
- Should the Director and/or Board Chair be potentially involved in the reported issue, or if so desired, such issue may be reported to any member(s) of the Board ("Board Contact"). Our contact list of board members will be updated annually (or as need).
- While a report may be submitted anonymously, the reporting person should understand that anonymity might impede APA's ability to conduct a complete investigation.
- All attempts shall be made to the extent possible and consistent with the need to conduct an adequate investigation, when the identity of the reporting person is known, to maintain the anonymity of that individual.

III. Investigation

- In cases in which the identity of the reporting person is known, the Director or the Board Contact will notify that individual and acknowledge receipt of the reported violation or suspected violation within five (5) business days. The Director will promptly initiate an investigation to determine whether there is reasonable cause to believe that the complaint has merit.
- On a case-by-case basis, the Director or Board Contact shall determine appropriate action for all complaints that have merit. 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 Director or other individual designated by the Director shall coordinate investigative and procedural activities. Should the Director and/or Chairman of the Board be potentially involved in the issue or if a Board Contact has been designated, the Board Contact shall notify the Board and the Board shall appoint a Board member to coordinate activities.
- If the identity of the reporting person is known, the Director or Board Contact shall notify that individual of any resulting corrective action(s) taken.

IV. Retaliation

APA may not retaliate (as defined in Section V), and prohibits retaliation by its directors, volunteers, members, employees, and representatives against anyone who makes a report in good faith under this Whistleblower Policy. The same shall apply to those who cooperate, testify and/or assist in any investigation initiated under this policy.

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

V. Definition of Terms

APA. Ascend Performing Arts, Inc.

Board Contact. A member of the Ascend Performing Arts, Inc. Board of Directors selected by an individual to receive a whistleblower complaint pursuant to this policy.

Harassment. Harassment can take many forms, but generally involves conduct, comment or display that is insulting, intimidating, humiliating, hurtful, demeaning, belittling, malicious, degrading, or otherwise causing offense, discomfort, personal humiliation or embarrassment to a person or group of persons.

Retaliation. Includes but is not limited to the following direct or indirect actions: dismissal, demotion, suspension, threats, or harassment of the reporting individual and/or his/her family members.

Sexual harassment. Includes but is not limited to unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature or related to a person's sex when:

- Submitting to or rejecting this conduct can affect decisions about the individual
- The conduct has the purpose or effect of interfering with the individual's performance
- The conduct detrimentally affects the environment.