

## **WHISTLEBLOWER POLICY FOR EMPLOYEES AND VOLUNTEERS OF THE FLORIDA ORCHESTRA ASSOCIATION**

If any employee or volunteer reasonably believes that a policy, practice, or activity of the Florida Orchestra Association (FOA) is in violation of law, a written complaint must be filed by that employee or volunteer with the Executive Director or the Board President.

It is the intent of the FOA to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees and volunteers is necessary to achieving compliance with various laws and regulations. An employee or volunteer is protected from retaliation only if the employee or volunteer brings the alleged unlawful activity, policy, or practice to the attention of the FOA and provides the FOA with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees and volunteers that comply with this requirement.

The report will be investigated and even if determined not to be unlawful, the FOA will not retaliate against an employee or volunteer who in good faith, has made a protest or raised a complaint against some practice of the FOA, or of another individual or entity with whom the FOA has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

### **FOA Actions in Response**

Whether reported to the president or the executive director, the executive committee shall investigate the allegation. As part of that investigation, the executive committee may interview employees, vendors, or others mentioned in the allegation.

Following the investigation, the FOA Executive Committee shall take the following steps:

1. Provide the person filing a report with a summary of findings.
2. Take steps to deal with the issue addressed, including making operational and/or personnel changes.
3. If warranted, contact law enforcement to deal with any criminal activities.

The whistleblower protection policy for FOA complies with the Public Company Accounting Reform and Investor Protection Act of 2002 (Sarbanes-Oxley). This provision in the legislation applies to all organizations, not just those that operate for profit.