



WHISTLEBLOWER POLICY & PROCEDURE 2016

The Sacramento Valley Symphonic Band Association (**SVSBA**) requires that its Board of Directors, Officers, committee members, other volunteers, contractors, providers, agents, and members (collectively, **SVSBA Persons**) operate legally and ethically in all SVSBA matters. In the spirit of transparency, this policy and procedure (a) encourages SVSBA Persons to raise legal, financial, and/or ethical concerns internally so that SVSBA can address and correct inappropriate conduct, and (b) commits SVSBA to protect SVSBA Persons from retaliation for whistleblowing.

POLICY

It is in SVSBA's interest that any SVSBA Person feel safe and willing to report in good faith a suspected ethics violation, financial misreporting or fraud, violation of applicable law or regulation, violation of SVSBA By-Laws, or other inappropriate conduct by one or more SVSBA Persons. Accordingly:

- (1) Retaliation or attempted retaliation (for example: harassment, discrimination, attacks on reputation, exclusion from SVSBA activities) by an SVSBA Person against any SVSBA Person reporting a suspected violation in good faith (**Whistleblower**) is subject to disciplinary action by SVSBA's Board of Directors.
- (2) SVSBA will protect the confidentiality of a Whistleblower, consistent with proper investigation of the report and follow-up.
- (3) If investigation shows intentional false reporting by the Whistleblower (i.e. not good faith), the Whistleblower is subject to disciplinary action by SVSBA's Board of Directors to protect the reputation of SVSBA and other SVSBA Persons.

This document is accessible on SVSBA's website. New Directors, Officers, and committee members are made familiar with this policy and procedure and its implementation at the beginning of their tenures.

PROCEDURE

A Whistleblower who has reasonable grounds for a concern about the legal, financial, or ethical conduct of any other SVSBA Person(s) reports the concern to the SVSBA President, who is responsible for investigating promptly, i.e. normally within five business days. If the President is a subject of the concern, the Whistleblower reports the concern to SVSBA's Vice President, who is responsible for investigating promptly. If two or more members of SVSBA's Board are subjects of the concern, the Whistleblower reports the concern to the sitting Audit Committee, which is responsible for investigating promptly.

A Whistleblower may report a concern anonymously by letter to SVSBA, P.O. Box 60725, Sacramento CA 95860, providing sufficient detail to support an investigation.

The investigator'(s) written report is provided to the Board of Directors as well as the Whistleblower. The Board of Directors is responsible for resolution including appropriate disciplinary action based on the result of the investigation. Resolutions will be documented in Board meeting minutes, with due regard for individual confidentiality. The Whistleblower's identity normally remains confidential and limited to the responsible investigator(s).

Any Whistleblower who believes him/herself to be the subject of retaliation should promptly report it in accordance with this Policy.

The protections under this policy and procedure apply to any Director, Officer, committee member, other volunteer, contractor, provider, agent, or member of SVSBA. Similarly, the prohibition of and potential disciplinary action for retaliation apply to any Director, Officer, committee member, other volunteer, contractor, provider, agent, or member of SVSBA.

SVSBA Board of Directors, 7/10/2016