

Peninsula Symphony of Northern California Association, aka Peninsula Symphony Orchestra and/or PSO

WHISTLEBLOWER PROTECTION POLICY

September 30, 2015

Peninsula Symphony requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of PSO, we must practice honesty and integrity in fulfilling our responsibilities, and will comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that PSO can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about illegal and/or unethical behavior relating to the operations of PSO, including but not limited to violations of PSO's Code of Conduct, Conflict of Interest Policy, or suspected violations of any law or regulation that relates to PSO's operations.

No Retaliation

No board member, officer, employee, contractor or volunteer may retaliate against any person who in good faith reports an legal or ethical violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any law or regulation governing the operations of PSO.

No board member or employee may retaliate against any person who has, in good faith and on the basis of a reasonable belief that the practice is unlawful or unethical, made a complaint against some practice of Peninsula Symphony, or of another individual or entity with whom Peninsula Symphony had a business relationship.

No board member or employee shall retaliate against an employee who discloses or threatens to disclose to a supervisor or a public body any activity, policy, or practice of Peninsula Symphony that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law, or in violation of a clear mandate or public policy concerning health, safety, welfare, or protection of the environment.

An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

PSO has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your

supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Board Chair or the Chair of the Governance Committee. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to PSO's Board Governance Chair, who has the authority to investigate all reported complaints.

Compliance Officer

PSO's Governance Chair is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved or referred to the proper authorities. The Board Governance Chair will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Board Chair.