

CHARLESTON
SYMPHONY
ORCHESTRA

Ken Lam Music Director

WHISTLEBLOWER POLICY

The Charleston Symphony Orchestra requires board members, officers, employees, other orchestra members and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Charleston Symphony Orchestra, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable board members, officers, employees, other orchestra members and volunteers to raise serious concerns so that the Charleston Symphony Orchestra can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, other orchestra members and volunteers to report concerns about violations of the Charleston Symphony Orchestra's code of ethics or suspected violations of law or regulations that govern Charleston Symphony Orchestra's operations.

No Retaliation

It is the policy of the Charleston Symphony Orchestra not to retaliate against any board member, officer, employee, orchestra member or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination or suspected fraud, or suspected violation of any regulation governing the operations of the Charleston Symphony Orchestra. 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

The Charleston Symphony Orchestra has an open door policy and employees and orchestra members are encouraged to share their questions, concerns, suggestions or complaints verbally or in writing with their supervisor, the Executive Director or the Music Director. Board members, officers, and volunteers should share their questions, concerns, suggestions or complaints with the President. When a complaint or concern about suspected ethical and legal violations is received it will be reported in writing to the Vice President of the Nominating and Governance Committee who is the Charleston Symphony Orchestra's Compliance Officer. If you are not comfortable communicating with your supervisor, the Executive Director, the Music Director or the President, or you are not satisfied with the response you received, you are encouraged to contact the Charleston Symphony Orchestra Compliance Officer directly at governance@charlestonsymphony.org. The Compliance Officer will acknowledge receipt of the reported or suspected violation to the person who submitted a complaint or concern.

Handling of Reported Violations

The Charleston Symphony Orchestra's Compliance Officer is responsible for ensuring that all complaints or concerns about unethical or illegal conduct are promptly investigated and that appropriate corrective is taken if that is warranted by the investigation.

The Compliance Officer will report initially to the Executive Committee, and following that to the Board of Directors all complaints and concerns and their resolution.

Accounting and Auditing Matters

The Charleston Symphony Orchestra's Compliance Officer shall immediately notify the Finance and Audit Committee of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Policy approved by the Board of Directors on August 1, 2016.