

# Whistleblower, Non Retaliation, and Harassment Policy

Columbus and Central Ohio Children's Chorus Foundation, (hereafter referred to as CCC) requires directors, officers, employees, member of the choirs and their parents or guardians, and volunteers (hereafter referred to as CCC representative(s)) to observe high standards of business and personal ethics in the course and scope of their duties and responsibilities performed on behalf of CCC. CCC representatives must practice honesty and integrity, and comply with all applicable laws, and regulations.

#### Reporting Responsibility

This Whistleblower, Non Retaliation, and Harassment Policy is intended to encourage and enable CCC representatives to report suspected or actual wrongful conduct internally so that CCC can investigate, address and correct inappropriate conduct or actions. It is the responsibility of all CCC representatives to report suspected or actual violations of CCC's code of ethics, violations of law or regulations that govern CCC's operations.

#### Non Retaliation

It is contrary to the values of CCC for anyone to retaliate against an individual who, in good faith, reports suspected or actual wrongful conduct, an ethics violation, or a suspected violation of law (e.g. such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of CCC). A CCC representative may not retaliate against anyone who makes such a report. Any CCC representative who is found to have retaliated against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

#### **Reporting Procedure**

CCC has an open door policy and suggests that complainants share their questions, concerns, suggestions, or complaints with their supervisor (employee) or with their choral director (choir manager/volunteer). If a CCC representative is not comfortable speaking with his or her supervisor or choral director or is not satisfied with their response, the CCC representative is encouraged to speak with either the Managing Director or Board President as appropriate. Supervisors and choral directors are required to report complaints or concerns about suspected ethical and legal violations in writing to CCC's Board President, who has the responsibility to initiate an investigation of all reported complaints.

#### **Compliance Coordinator**

CCC's Board President is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Board President will advise the Board of Trustees of all complaints and their resolution.

# **Accounting and Auditing Matters**

CCC's Board President shall immediately notify the Finance 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 which prove to have been made maliciously or knowingly to be false will be addressed by the Board President or their designee.

# 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 or the requirement to make reports to external law enforcement.

**Handling of Reported Violations** CCC's Board President, or their designee, will acknowledge receipt of the reported or suspected violation to the complainant. All reports will be promptly investigated. Appropriate corrective action will be taken, if warranted by the investigation.

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Board President - November 2023
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Date Updated: November 13, 2023 Date Ratified: November 13, 2023

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