

WHISTLEBLOWER POLICY FOR EMPLOYEES AND VOLUNTEERS OF THE STRAND THEATRE PRESERVATION SOCIETY

If any employee or volunteer reasonably believes that a policy, practice, or activity of the Strand Theatre Preservation Society (STPS) is in violation of law, a written complaint must be filed by that employee or volunteer with the Executive Director or a member of the STPS Executive Committee. It is the intent of the STPS to adhere to all laws and regulations that apply to the organization and the 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 STPS and provides the STPS 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 STPS 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 STPS, or of another individual or entity with whom the STPS 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.

STPS Actions in Response Whether reported to the executive director or the president, 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 STPS Executive Committee shall take the following steps:

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

The whistleblower protection policy for STPS 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.

Policy Adopted – August 18, 2020