

WHISTLE BLOWER POLICY

Employees are encouraged to report any suspected violation of law, rule or regulation to one or more of the parties specified in this Policy. The employee is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials of the Cathedral Arts Project are charged with these responsibilities.

Examples of activities which should be reported are violations of federal, state or local laws, rules or regulations; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee of the Cathedral Arts Project has knowledge of or a concern of a violation of law, rule or regulation, the employee is to contact his/her immediate supervisor, the Vice President of Finance & Administration or the President & CEO. While employees are encouraged to report violations, the employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

The Cathedral Arts Project will not retaliate against any employee who discloses, or threatens to disclose, to any appropriate governmental agency, under oath, in writing, an activity, policy, or practice that is in violation of a law, rule, or regulation; who provides information to, or testifies before, any appropriate governmental agency, person, or entity conducting an investigation, hearing, or inquiry into an alleged violation of a law, rule, or regulation by the Cathedral Arts Project; or who objects to or refuses to participate in, any activity, policy, or practice of the Cathedral Arts Project which is in violation of a law, rule, or regulation. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes s/he is being retaliated against must contact their supervisor, the Vice President of Finance & Administration or the President & CEO immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of suspected violations of law, rule and regulation will be promptly submitted to the Vice President of Finance & Administration and the President & CEO who are responsible for investigating and coordinating corrective action. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals a right to respond.

Employees are afforded rights under a law known as Defend Trade Secrets Act (DTSA). The provisions of the DTSA provide the following:

(1) Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

(2) Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual—(A)

files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order."

Employees with any questions regarding this policy should contact the Vice President of Finance & Administration.