

Intermountain Percussion Association

Whistleblower Policy

I. Purpose and Scope

Intermountain Percussion Association (“IMPA”) requires the directors, volunteers, employees and participants to act ethically, practice honesty and integrity, and comply with all applicable laws, regulations and ordinances.

IMPA hopes that all will feel free to raise concerns with IMPA. IMPA recognizes the need to provide a mechanism for the confidential and anonymous submission of such concerns, to provide IMPA full opportunity to investigate and address potential violations of policy, law or ordinance.

The purpose of this Whistleblower Policy is to establish policies and procedures for:

- Submitting concerns from employees, directors, officers, participants and other stakeholders on a confidential and anonymous basis regarding anything against the policies of the organization, including but not limited to:
 - Questionable accounting or auditing matters
 - Questionable business ethics
 - Conflicts of interest
 - Acceptance, provision or solicitation of bribes or kickbacks
 - Legal or regulatory violations
 - Unsafe practices or activities which unnecessarily endanger health or safety
 - Bullying or harassment
 - Other actions which potentially compromise the integrity of IMPA
- The receipt, retention and treatment of concerns raised; and
- The protection of individuals raising concerns, and their families, from retaliatory actions.

II. Reporting Responsibility

- Every director, volunteer, member and employee of IMPA and its affiliates has an obligation to report issues as listed in Section I above.
- Reports shall be made to the Executive Director and President of the IMPA Board of Directors (the “Board”).
- To ensure a confidential forum for reporting concerns, complaints, and issues, IMPA has established a mechanism on its website, www.im-pa.org, to enable anyone to send an anonymous message directed to entirety of the Board of Directors.
- Should the Executive Director and/or President of the Board be potentially involved in the reported issue, such issue shall be reported to any member(s) of the Board.

III. Investigation

- On a case-by-case basis, the Board shall determine appropriate action. This may include appointing a committee to investigate, report the findings of such investigation back to the Board and recommend appropriate corrective action.
- When applicable, reports may be referred to an independent third party for investigation and recommendations including proper notification of authorities.
- A Compliance Officer or other individual designated by the President of the Board shall coordinate investigative and procedural activities. Should the Compliance Officer and Chairman of the Board be potentially involved in the issue, the Board shall appoint a member of the Board to coordinate activities.

IV. Retaliation

- IMPA will not retaliate, and prohibits retaliation by its directors, volunteers, members, employees, participants and representatives, against anyone who makes a report in good faith under this Whistleblower Policy.
- IMPA reserves the right to act against anyone who makes a report based upon false or misleading information, or without a reasonable basis for believing any wrongdoing has occurred.

V. Employee Responsibilities

- Nothing in this Whistleblower Policy is intended to abrogate any duties IMPA employees owe IMPA, under any applicable laws, regulations or ordinances, to disclose, report violations (or suspected violations) of law or policy, cooperate fully in any investigations, including investigations of harassment, or to fulfill their duty of loyalty to IMPA.