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# BDPA Safe Place Policy

## I. Introduction

BD Performing Arts (BDPA) requires the directors, volunteers, staff, employees, and members of BDPA and its affiliates to act ethically, practice honesty and integrity, and comply with all applicable laws, regulations, ordinances, and BDPA internal policies.

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

## II. Purpose

Submitting concerns from employees, directors, officers, members, 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; and
- Other actions which potentially compromise the integrity of BDPA;

Other primary purposes are the receipt, retention, and treatment of concerns raised and the protection of individuals raising concerns, and their families, from retaliatory actions.

## III. Reporting Responsibility

Every director, volunteer, member, and employee of BDPA and its affiliates has an obligation to report issues as listed in Section II above.

Reports shall be made to the BDPA Ethics Committee consisting of Compliance Director and the President of the BDPA's Board of Directors (the "Board"). The Ethics Committee is fully empowered to investigate each reported concern.

To ensure a confidential forum for reporting concerns, complaints, and issues, BPDA has established a mechanism on its website, [bluedevils.org](http://bluedevils.org), and an email address [ethics@bluedevils.org](mailto:ethics@bluedevils.org) to enable anyone to send an anonymous message directed to the Ethics Committee. In addition, reports may be made through the Ethics Line at (925) 359-9479. The Ethics Line is monitored by members of the Ethics Committee.

Should a member of the Ethics Committee be potentially involved in the reported issue, such issue shall be reported to any member(s) of the Board.

## IV. Investigation

On a case-by-case basis, the Ethics Committee shall determine appropriate action. This may include appointing an ad hoc committee of Board members to conduct an investigation, retain outside investigators, counsel, and experts as it deems necessary or appropriate to assist with any investigation or any other acts associated with the issues or concerns raised and report the findings of such investigation back to the Ethics Committee, and recommend appropriate corrective action as necessary to the Executive Committee of the Board of Directors.

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## **V. Retaliation**

BDPA will not retaliate, and prohibits retaliation by its directors, volunteers, members, employees and representatives, against anyone who makes a report in good faith under this BDPA Safe Place Policy.

Anyone filing a 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 of issues in section II. BDPA reserves the right to take action against anyone who makes a report based upon false or misleading information, or without a reasonable basis for believing any wrongdoing has occurred.

## **VI. Employee Responsibilities**

Nothing in this BDPA Safe Place Policy is intended to abrogate any duties BDPA employees owe BDPA, 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 BDPA.