

## **GREAT LAKES OPERETTA**

### **ANTI-DISCRIMINATION, HARASSMENT AND RETALIATION POLICY**

#### **Introduction**

Great Lakes Operetta (the "Corporation") requires its directors, officers, employees and volunteers (each a "Protected Person"), to observe high standards of business and personal ethics in the performance of their duties on the Corporation's behalf. As representatives of the Corporation, Protected Persons are expected to practice honesty and integrity in fulfilling their responsibilities and are required to comply with all applicable laws and regulations.

#### **Anti-Discrimination**

The Corporation is committed to maintaining an environment free of discrimination on the basis of actual or perceived race, color, national origin, ancestry, marital status, citizenship status, sex, age, order of protection status, military status, unfavorable discharge from military service, religion, physical or mental disability, genetic information or predisposition, gender identity or expression, sexual orientation, pregnancy, pregnancy-related conditions, childbirth, arrest record, criminal history record ordered expunged, sealed, or impounded, or other characteristics protected by law (each a "Protected Characteristic") and will take appropriate measures to prevent and/or stop any such discrimination. Discrimination occurs when an Protected Person is adversely affected with respect to any term or condition of engagement with the Corporation (including participation, compensation, advancement, discipline, or termination) because of an actual or perceived Protected Characteristic. Any Protected Person who is aware of conduct that may violate this policy should promptly report the conduct using the procedure set forth below. Protected Persons who receive complaints of discrimination or who are made aware of conduct that may constitute discrimination must take immediate action to prevent such discrimination from continuing and investigate such conduct. Protected Persons who knowingly allow such conduct to continue will be subject to discipline up to and including termination of their relationship with the Corporation.

#### **Anti-Harassment**

The Corporation is also committed to providing a work environment that is free of unlawful harassment. Unlawful sexual harassment or discriminatory harassment, which is harassment based on any actual or perceived Protected Characteristic, constitutes misconduct, and the Corporation will take appropriate measures to prevent and/or stop any such harassment and discipline individuals who engage in such conduct. The Corporation's anti-harassment policy applies to all persons involved in its operations and prohibits unlawful harassing conduct by any individual involved with the Corporation. This policy also protects Protected Persons from prohibited harassment by third parties, such as vendors, clients, or independent contractors. Any individual who is aware of any conduct that may violate this policy, whether by a Protected Person, independent contractor, or other third party, should promptly report the conduct using the procedure set forth below. Protected Persons who receive complaints of harassment or

who are made aware of conduct that may constitute harassment must take immediate action to prevent such harassment from continuing and investigate such conduct. Protected Persons who knowingly allow such conduct to continue will be subject to discipline up to and including termination of their relationship with the Corporation.

Sexual harassment is defined as any unwelcome sexual advances, requests for sexual favors, or any other verbal, physical or other conduct of a sexual nature, whether by male, female or non-binary, when (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's engagement with the Corporation, or (ii) submission to or rejection of such conduct by an individual is used as a basis for decisions affecting such individual's engagement with the Corporation, or (iii) such conduct has the purpose or effect of substantially interfering with an individual's performance or creating an intimidating, hostile or offensive environment. Sexual harassment also includes sexual misconduct, which is defined as any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of a Protected Person's position. Sexual harassment in violation of this policy includes but is not limited to:

- sexually suggestive or vulgar comments or jokes, inappropriate comments about another person's sexual behavior or body, or insulting or ridiculing an individual because of his or her gender or gender identity;
- improper or intrusive questions or comments about an individual's romantic or sexual experiences or preferences, or unwelcome or offensive sexual flirtations, propositions, advances, or requests;
- use, display, or communication of sexually suggestive or offensive words, objects, pictures, calendars, cartoons, articles, letters, e-mail messages, computer programs, or Internet websites;
- making or threatening undesired physical contact (such as touching, embracing, or pinching) or impeding another's movements in a deliberate manner; or
- offering or providing benefits in return for sexual favors or an individual's agreement to provide sexual favors or taking or threatening to take adverse action against an individual because the individual rejects requests for sexual favors.

Discriminatory harassment is broadly defined as any unwelcome conduct on the basis of an individual's actual or perceived Protected Characteristic that has the purpose or effect of substantially interfering with the individual's performance or creating an intimidating, offensive, or hostile environment. Discriminatory harassment in violation of this policy includes but is not limited to:

- comments or jokes that denigrate, insult, offend, or ridicule based on a Protected Characteristic;

- creating a hostile environment or otherwise singling out an individual for abusive conduct based on that individual's Protected Characteristic; or
- using, displaying, or communicating words, objects, pictures, calendars, cartoons, articles, letters, e-mail messages, computer programs, or Internet websites that denigrate, insult, offend, or ridicule based on a Protected Characteristic.

Retaliation against individuals who complain of discrimination or harassment or who testify or assist in any investigation or proceeding of discrimination or harassment is unlawful. The Corporation will not tolerate retaliation against any individual who seeks to enforce his or her right to engage in an environment free of, participates in an investigation of, or makes a good faith report of discrimination, harassment or retaliation. Any Protected Person who is aware of any conduct that may violate this policy should promptly report the conduct using the procedure set forth below.

PERSONS WHO ENGAGE IN PROHIBITED DISCRIMINATION, HARASSMENT, OR RETALIATION UNDER THIS POLICY WILL BE SUBJECT TO APPROPRIATE DISCIPLINE UP TO AND INCLUDING TERMINATION OF THEIR RELATIONSHIP WITH THE CORPORATION.

### **Reporting Responsibility**

It is the responsibility of all Protected Persons to report in good faith any concerns they may have regarding actual or suspected actions which may violate this Anti-Discrimination, Harassment and Retaliation Policy (each a "Concern").

### **No Retaliation**

No Protected Person who in good faith reports a Concern shall suffer intimidation, harassment, retaliation, discrimination or adverse employment consequence because of such report. Any Protected Persons of the Corporation who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment. Notwithstanding anything contained herein to the contrary, this Anti-Discrimination, Harassment and Retaliation Policy is not an employment contract and does not modify the relationship between the Corporation and Protected Persons. Nothing contained herein is intended to provide any Protected Person with any additional rights or causes of action, other than those provided by law.

### **Reporting Concerns**

Any Concerns should be reported as soon as shall be practicable to the President of the Corporation (the "Compliance Officer"). Any questions with regard to the scope, interpretation

or operation of this Anti-Discrimination, Harassment and Retaliation Policy should also be directed to the Compliance Officer. Notwithstanding the foregoing, in the event that the Compliance Officer is the subject of the applicable Concern, Concerns should be reported to another member of the Board of Directors and/or any officer of the Corporation.

### **Compliance Officer**

The Compliance Officer is responsible for investigating and resolving all reported Concerns and shall advise the Board of Directors of all reported Concerns. The Compliance Officer shall report to the full Board of Directors at each regularly scheduled board meeting on compliance activity.

### **Handling of Reported Concerns**

The Compliance Officer will acknowledge the receipt of each reported Concern within five (5) business days, but only to the extent that reporting person's identity is disclosed or a return address is provided. The Compliance Officer shall immediately notify the Board of Directors of any reported Concern. All reports will be promptly investigated; the scope of any such investigation being within the sole discretion of the Board of Directors, and appropriate corrective action will be taken if warranted by the investigation.

### **Investigation**

The Compliance Officer may delegate the responsibility to investigate a reported Concern to one or more Protected Persons of the Corporation or to any other individual, including persons not employed by the Corporation, selected by the Compliance Officer; provided that the Compliance Officer may not delegate such responsibility to a Protected Person or another individual who is the subject of the reported Concern or in a manner that would compromise either the identity of an individual who reported the Concern anonymously or the confidentiality of the complaint or resulting investigation.

Notwithstanding anything herein to the contrary, the scope, manner and parameters of any investigation of a reported Concern, shall be determined by the Board of Directors in its sole discretion and the Corporation and its Protected Persons shall cooperate as necessary in connection with any such investigation. The Board of Directors shall determine what professional assistance, if any, is needed in order to conduct an investigation. The Board of Directors will be free in its sole discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.

### **Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing that the information disclosed may indicate a violation of ethical standards. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## **Confidentiality**

The Corporation takes seriously its responsibility to enforce this Anti-Discrimination, Harassment and Retaliation Policy and therefore encourages any person reporting a Concern to identify him or herself so as to facilitate any resulting investigation. Notwithstanding the foregoing, in reporting a Concern, a Protected Person may request that such report be treated in a confidential manner (including that the Corporation take reasonable steps to ensure that the identity of the reporting person remains anonymous). Concerns may also be reported on an anonymous basis. Reports of Concerns will be kept confidential to the extent possible and consistent with the need to conduct an adequate investigation.

## **Distribution**

The Corporation shall distribute a copy of this Anti-Discrimination, Harassment and Retaliation Policy to all Protected Persons.

## **Compliance Officer Contact Information**

Protected Persons may also ask questions, raise concerns, or, where permitted by law, report instances of potential non-compliance with this Anti-Discrimination, Harassment and Retaliation Policy by contacting the President of the Corporation or if the Concerns are with the President, by contacting any other officer or member of the Board of Directors.

## **GREAT LAKES OPERETTA**

### **WHISTLEBLOWER POLICY**

#### **Introduction**

Great Lakes Operetta (the "Corporation") requires its directors, officers, employees and volunteers (each a "Protected Person"), to observe high standards of business and personal ethics in the performance of their duties on the Corporation's behalf. As representatives of the Corporation, Protected Persons are expected to practice honesty and integrity in fulfilling their responsibilities and are required to comply with all applicable laws and regulations.

The objectives of this Whistleblower Policy are to encourage and enable Protected Persons, without fear of retaliation, to raise concerns regarding suspected unethical and/or illegal conduct or practices on a confidential and, if desired, anonymous basis so that the Corporation can address and correct inappropriate conduct and actions.

#### **Reporting Responsibility**

It is the responsibility of all Protected Persons to report in good faith any concerns they may have regarding actual or suspected activities which may be illegal, fraudulent or in violation of the Corporation's policies with respect to, without limitation, fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misappropriation or misuse of the Corporation's assets, forgery or alteration of documents, unauthorized alteration or manipulation of computer files, pursuit of a benefit or advantage in violation of the Corporation's Conflict of Interest Policy and authorizing or receiving compensation for hours not worked, goods not received or services not performed, as well as any violations or suspected violations of high business and personal ethical standards, as such standards relate to the Corporation (each a "Concern"), in accordance with this Whistleblower Policy.

#### **No Retaliation**

No Protected Person who in good faith reports a Concern shall suffer intimidation, harassment, retaliation, discrimination or adverse consequence because of such report. Any Protected Person of the Corporation who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of their relationship with the Corporation. Notwithstanding anything contained herein to the contrary, this Whistleblower Policy is not an employment contract and does not modify the relationship between the Corporation and its Protected Persons. Nothing contained herein is intended to provide any Protected Person with any additional rights or causes of action, other than those provided by law.

#### **Reporting Concerns**

Any Concerns should be reported as soon as shall be practicable to the President of the Corporation (the "Compliance Officer"). Any questions with regard to the scope, interpretation or operation of this Whistleblower Policy should also be directed to the Compliance Officer. Notwithstanding the foregoing, in the event that the Compliance Officer is the subject of the applicable Concern, Concerns should be reported to another member of the Board of Directors and/or any officer of the Corporation.

### **Compliance Officer**

The Compliance Officer is responsible for investigating and resolving all reported Concerns and shall advise the Board of Directors of all reported Concerns. The Compliance Officer shall report to the full Board of Directors at each regularly scheduled board meeting on compliance activity.

### **Handling of Reported Concerns**

The Compliance Officer will acknowledge the receipt of each reported Concern within five (5) business days, but only to the extent that reporting person's identity is disclosed or a return address is provided. The Compliance Officer shall immediately notify the Board of Directors of any reported Concern. All reports will be promptly investigated; the scope of any such investigation being within the sole discretion of the Board of Directors, and appropriate corrective action will be taken if warranted by the investigation.

### **Investigation**

The Compliance Officer may delegate the responsibility to investigate a reported Concern to one or more Protected Persons of the Corporation or to any other individual, including persons not employed by the Corporation, selected by the Compliance Officer; provided that the Compliance Officer may not delegate such responsibility to a Protected Person or another individual who is the subject of the reported Concern or in a manner that would compromise either the identity of a Protected Person who reported the Concern anonymously or the confidentiality of the complaint or resulting investigation.

Notwithstanding anything herein to the contrary, the scope, manner and parameters of any investigation of a reported Concern, shall be determined by the Board of Directors in its sole discretion and the Corporation and its Protected Persons shall cooperate as necessary in connection with any such investigation. The Board of Directors shall determine what professional assistance, if any, is needed in order to conduct an investigation. The Board of Directors will be free in its sole discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.

### **Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing that the information disclosed may indicate a violation of ethical standards. Any allegations

that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **Confidentiality**

The Corporation takes seriously its responsibility to enforce this Whistleblower Policy and therefore encourages any person reporting a Concern to identify him or herself so as to facilitate any resulting investigation. Notwithstanding the foregoing, in reporting a Concern, a Protected Person may request that such report be treated in a confidential manner (including that the Corporation take reasonable steps to ensure that the identity of the reporting person remains anonymous). Concerns may also be reported on an anonymous basis. Reports of Concerns will be kept confidential to the extent possible and consistent with the need to conduct an adequate investigation.

### **Distribution**

The Corporation shall distribute a copy of this Whistleblower Policy to all Protected Persons.

### **Compliance Officer Contact Information**

Protected Persons may also ask questions, raise concerns, or, where permitted by law, report instances of potential non-compliance with this Whistleblower Policy by contacting the President of the Corporation or if the concerns are with the President, by contacting any other officer or member of the Board of Directors.

Board President - Kristin Weed: [kristin@greatlakesoperetta.com](mailto:kristin@greatlakesoperetta.com)

General Email: [info@greatlakesoperetta.com](mailto:info@greatlakesoperetta.com)