



World Concertina Congress, Incorporated

Whistleblower Policy

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ARTICLE I — INTRODUCTION

The World Concertina Congress ("WCC") is dedicated to advancing the concertina, its music, history, and community. The WCC requires its Officers, Trustees, and volunteers, as well as all persons who provide services to the WCC under contract (collectively, "Protected Persons"), to observe high standards of business and personal ethics in the performance of their duties on the WCC's behalf. As representatives of the WCC, Protected Persons are expected to practice honesty and integrity in fulfilling their responsibilities and are required to comply with all applicable laws and regulations.

PURPOSE AND SCOPE:

This Whistleblower Policy applies to all Protected Persons and covers alleged violations of law, WCC policies, or ethical standards that occur in connection with WCC activities, operations, and governance, including but not limited to WCC events, meetings, festivals, online platforms, and volunteer work, regardless of geographic location or format of engagement.

This Policy is designed to work in conjunction with the WCC's Bylaws, Conflicts of Interest Policy, and other applicable organizational policies. In the event of any conflict between this Policy and another WCC policy, this Policy shall govern whistleblower protections and procedures.

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 WCC can address any allegations of inappropriate conduct and actions.



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ARTICLE II — DEFINITIONS

The following terms are used throughout this Policy:

- **"Concern"** means any actual or suspected activity that is illegal, unethical, or in violation of the WCC's policies, including but not limited to fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of the WCC's assets, conflicts of interest, discrimination, harassment, violation of donor restrictions or fund designations, misrepresentation in grant applications or public reports, serious safety violations during WCC events or activities, or any other violation of applicable law or the WCC's code of conduct.
- **"Protected Person"** means any trustee, officer, employee, volunteer, committee member, or contractor of the WCC who reports a Concern or who is subject to potential retaliation for reporting a Concern.
- **"Retaliation"** means any adverse employment action, disciplinary action, intimidation, harassment, discrimination, or materially adverse action in the context of the person's relationship with WCC, including but not limited to removal from committees or roles, exclusion from WCC events or opportunities, denial of advancement or privileges, negative references, or other unfavorable treatment, taken against a Protected Person in response to a good faith report of a Concern.
- **"Good Faith"** means the Concern is reported with honest belief that the information disclosed may indicate a violation of law, regulation, or ethical standards, based on reasonable grounds. Good faith is presumed unless an investigation affirmatively establishes that the reporter knew the allegation was false or made the report with reckless disregard for its truth.



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ARTICLE III — 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 or in violation of the WCC's policies, in accordance with this Whistleblower Policy.

All Officers and Trustees who receive a report of a Concern shall promptly forward such report (or ensure it is forwarded) to the Compliance Committee Chair or appropriate member of the Compliance Committee and shall not attempt to investigate the matter independently.



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ARTICLE IV — 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 Officer, Trustee, or volunteer of the WCC who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment or disassociation from the WCC.

Retaliation itself may be reported as a Concern under this Policy and will be promptly investigated. The WCC will not retaliate against any Protected Person for reporting Concerns to external authorities, including law enforcement, regulatory agencies, or internal revenue service, nor will the WCC retaliate against any Protected Person for cooperating with or responding to governmental investigations, subpoenas, or other legal processes. This Policy does not limit or discourage any Protected Person's legal rights or statutory protections under federal, state, or local whistleblower statutes.

A Protected Person may report a Concern to WCC under this Policy and simultaneously, or alternatively, report to external authorities. The WCC's commitment to non-retaliation applies regardless of whether the person reports exclusively to WCC, exclusively to external authorities, or to both.

Notwithstanding anything contained herein to the contrary, this Whistleblower Policy is not an employment contract and does not modify the relationship between the WCC and its Officers, Trustees, or volunteers, nor does it change the fact that Officers, Trustees, and volunteers of the WCC are in that role at will. Nothing contained herein is intended to provide any Protected Person with any additional rights or causes of action, other than those provided by law.



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ARTICLE V — REPORTING CONCERNS

Any Concerns should be reported as soon as practicable using one or more of the following methods:

PRIMARY REPORTING CHANNELS:

1. Email: whistleblower[at]concertinamusic[dot]com
2. In Person or by Email: Contact the Compliance Committee Chair or, if unavailable or implicated in the Concern, the Backup Compliance Committee Chair (WCC President)

ESCALATION:

If the Concern involves the Compliance Committee Chair or President, report to the Vice President or another member of the Board of Directors.

ALTERNATIVE EXTERNAL REPORTING:

Protected Persons are not required to use WCC's internal channels first. They may report Concerns directly to:

- Law enforcement
- Relevant federal, state, or local regulatory agencies
- The state's charity regulator or attorney general (if applicable)
- The Internal Revenue Service
- Any other appropriate external authority

The WCC will not retaliate against Protected Persons reporting to external authorities instead of, or in addition to, reporting internally.

Any questions about the scope, interpretation, or operation of this Whistleblower Policy should be directed to the Compliance Committee Chair or, if necessary, to the WCC President.



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ARTICLE VI — COMPLIANCE COMMITTEE CHAIR

The Compliance Committee Chair is responsible for:

- Receiving all Concerns reported under this Policy
- Determining whether each reported Concern warrants investigation
- Investigating or delegating investigation of reported Concerns in accordance with this Policy
- Maintaining confidentiality and records as required herein
- Advising the Compliance Committee and, if appropriate, the WCC President and Board of Directors of all reported Concerns and their resolution
- Ensuring that persons reporting in good faith are not retaliated against and monitoring for any instances of retaliation
- Escalating systemic issues identified through reported Concerns to the Compliance Committee and Board of Directors for review and corrective action (e.g., policy updates, process improvements, or additional training)

The Compliance Committee Chair shall report to the Board of Directors at the next scheduled Board meeting if there has been compliance activity. If there are active investigations or unresolved Concerns, the Compliance Committee Chair shall provide a summary report (maintaining confidentiality to the extent possible and excluding personally identifying information unless necessary for Board oversight). An annual report of all Concerns received, categories, and resolutions shall be provided to the Board, if any such Concerns are received.

Backup Compliance Committee Chair:

In the event the primary Compliance Committee Chair is unable or unwilling to perform these duties, or is the subject of a reported Concern, the WCC President shall assume the role of Compliance Committee Chair for purposes of that matter. If both the Compliance Committee Chair and President are implicated, the Vice President shall assume these duties.



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ARTICLE VII — ACCOUNTING AND AUDITING MATTERS

The Compliance Committee of the Board of Directors shall address all reported Concerns regarding the WCC's accounting practices, internal controls, or auditing.

The Compliance Committee Chair shall immediately notify the Compliance Committee of any Concern related to accounting, internal controls, or auditing and shall work with the Committee until resolution.

Upon receipt, the Compliance Committee shall evaluate whether a Concern constitutes an accounting concern and, if so, shall promptly determine what professional assistance, if any, it needs in order to investigate. The Compliance Committee will be free in its sole discretion to engage outside auditors, legal counsel, or other experts to assist in the investigation and analysis of results. Such engagement may be made without advance Board approval if reasonably necessary to conduct a timely investigation, provided that the Compliance Committee Chair reports such engagement to the Board of Directors at its next meeting.



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ARTICLE VIII — INVESTIGATIONS

INVESTIGATION PROCESS:

The Compliance Committee Chair may delegate the responsibility to investigate a reported Concern to one or more Officers or Trustees, or to any qualified third party (including people not affiliated with the WCC), selected by the Compliance Committee Chair; provided that:

- The Compliance Committee Chair may not delegate investigation to any person who is the subject of the reported Concern
- The Compliance Committee Chair may not delegate investigation in a manner that would compromise either the identity of a person who reported the Concern anonymously or the confidentiality of the complaint or resulting investigation
- The investigator shall have no material conflict of interest with the subject of the Concern
- The investigator shall have no prior relationship or close personal tie to the subject that would reasonably compromise impartiality

The scope, manner, and parameters of any investigation shall be determined by the Compliance Committee (for accounting matters) or the Compliance Committee Chair (for other matters), in their sole discretion. The WCC and its Protected Persons shall cooperate as necessary in connection with any such investigations.

DUE PROCESS FOR THE SUBJECT OF THE CONCERN:

The person or persons who are the subject of a reported Concern ("Respondent") shall be given a reasonable opportunity to respond to the allegations, consistent with the need to preserve confidentiality, prevent destruction of evidence, and avoid compromising an ongoing investigation or legal proceeding. The Respondent shall be informed of any investigative findings that implicate them, except where doing so would compromise an ongoing investigation or related legal proceeding.

STANDARD OF REVIEW:

Investigations shall seek to determine whether the reported Concern is substantiated based on the preponderance of available evidence. A Concern is substantiated if it is more likely than not that a violation of law, regulation, or WCC policy occurred.

INVESTIGATION TIMELINE:

The Compliance Committee Chair shall ensure that investigations commence promptly and are completed within a reasonable period (typically within 60 days of the reported Concern, or as



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soon as reasonably practicable given the complexity of the Concern and availability of witnesses and information). The Compliance Committee Chair shall keep the reporting person informed of the status of the investigation to the extent consistent with confidentiality and investigation integrity.

NOTIFICATIONS AND ESCALATION:

Where appropriate and permitted by applicable law, the Compliance Committee Chair may notify:

- WCC's insurance carriers (if applicable)
- Legal counsel
- Law enforcement or regulatory authorities, if the investigation reveals criminal conduct or violations of law that must be reported



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ARTICLE IX — 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 law and/or ethical standards. Good faith is presumed unless the investigation affirmatively establishes that the reporter knew the allegation was false or made the report with reckless disregard for its truth.

Allegations that are not substantiated do not, by themselves, constitute a violation of this Policy or grounds for discipline of the reporting person, provided they were reported in good faith and based on reasonable belief. Any report made with knowledge that the allegation is false or made maliciously to harm another person or damage the WCC, will be viewed as a serious breach of this Policy and may result in disciplinary action.



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ARTICLE X — CONFIDENTIALITY

The WCC takes seriously its responsibility to enforce this Whistleblower Policy and therefore encourages any person reporting a Concern to identify themselves so as to facilitate any resulting investigation.

Notwithstanding the foregoing, in reporting a Concern, a Protected Person may request that such report be treated confidentially (including that the WCC takes 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, consistent with the need to conduct an adequate investigation, comply with applicable law, or fulfill the WCC's legal or governance obligations.

The WCC will disclose information related to a reported Concern only to those individuals who have a legitimate "need to know" in order to:

- Conduct the investigation
- Provide oversight to the Board of Directors and Compliance Committee
- Comply with legal or regulatory requirements
- Implement remedial or corrective action
- Notify insurance carriers or legal counsel where necessary



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ARTICLE XI — HANDLING OF REPORTED CONCERNS

The Compliance Committee Chair will acknowledge receipt of each reported Concern within seven (7) business days, but only to the extent the reporting person's identity is disclosed or a return address is provided.

PRELIMINARY REVIEW:

Within fourteen (14) business days of receipt, the Compliance Committee Chair shall conduct a preliminary review to determine whether the Concern, if substantiated, would constitute a violation of law or organizational policy and whether investigation is warranted.

All reports will be promptly investigated; the scope of any such investigation shall be within the sole discretion of the Compliance Committee (for accounting matters) or the Compliance Committee Chair (for other matters), and appropriate corrective action will be taken if warranted by the investigation.

RESOLUTION AND COMMUNICATION:

Upon completion of the investigation, the Compliance Committee Chair shall prepare a written report on the findings. This report shall be maintained confidentially and shared only with those who have a legitimate need to know. To the extent consistent with confidentiality and legal privilege, the reporting person shall be informed of the outcome (e.g., that the Concern was substantiated and corrective action taken, or that the Concern was not substantiated). The subject of the Concern shall also be informed of any investigative findings that implicate them, unless doing so compromises an ongoing investigation or legal proceeding.



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ARTICLE XII — RECORDS

The Compliance Committee will retain on a strictly confidential basis for a period of five (5) years (or otherwise as required under the WCC's record retention policies in effect from time to time) all records relating to any reported Concern and to the investigation and resolution thereof.

All such records, including electronic communications, documents, and investigator notes, shall be stored securely in a restricted-access repository, whether physical or digital. All such records shall be stored separately from personnel records of the subject of the Concern. All such records are confidential to the WCC and shall be considered privileged and confidential.

Access to Concern-related records is limited to:

- The Compliance Committee Chair and Compliance Committee members
- Legal counsel and external investigators (as needed)
- Persons authorized by Board resolution
- As required by law or court order



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ARTICLE XIII — DISTRIBUTION AND TRAINING

The WCC shall make certain the latest version of this Whistleblower Policy is available to all Protected Persons and shall refer this Policy to all Officers, Trustees, volunteers, and new members or participants upon joining the WCC.

This Policy shall be:

- Posted on the WCC website in a prominently accessible location
- Included in materials for new Officers, Trustees, and key volunteers
- Made available to all WCC members upon request

The WCC Executive Committee shall review this Policy at least annually and shall advise the Compliance Committee Chair and Compliance Committee members regarding their respective roles and responsibilities under this Policy. The Executive Committee shall ensure that the Board of Directors understands:

- How to recognize potential Concerns
- How to receive and report Concerns
- The non-retaliation protections and obligations of this Policy
- Their roles and responsibilities under this Policy



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ARTICLE XIV — CONTACT INFORMATION

The following individual(s) are designated as Compliance Committee Chair and Backup:

Role	Name	Title	Email
Compliance Committee Chair	Andrew Gawien	Chair, Compliance Committee	andrew[dot]gawien[at]gmail[dot]com
Backup	Vincent Lech	President	concertinaplayer[at]gmail[dot]com
Escalation (if above unavailable)	Matthew Wundrow	Vice President	wundswiss16[at]gmail[dot]com

[NOTE: This contact information may be updated administratively by the Board of Directors or Executive Committee without requiring re-adoption of this entire Policy.]



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ARTICLE XV — APPROVAL AND EFFECTIVE DATE

This Policy was adopted by the Board of Directors of the World Concertina Congress on February 2, 2026, and shall be effective immediately upon adoption.

The Policy shall be reviewed and reaffirmed by the Board of Directors annually and revised as needed to reflect changes in organizational structure, applicable law, or governance best practices.



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REVISION HISTORY

Revision	Date	Changes
1	02/02/2026	Initial comprehensive review; added expanded scope language, clarified definitions, enhanced reporting channels, added due process and investigation standards, improved confidentiality and records provisions, added training requirements.