

Juilliard

Title:	Whistleblower Policy
Policy Owner:	Office of the General Counsel
Contact Information:	Room 225 Main Building (212) 799-5000, ex. 231 OGC@juilliard.edu
Applies to:	All employees, volunteers, and Trustees of The Juilliard School.
Effective Date:	March 1, 2018

In carrying out their responsibilities, Juilliard's Trustees, officers, employees, and volunteers are required to adhere to the law and to the highest standards of business practices, as described in the School's *Standards of Ethical Business Conduct*. Early identification of violations of the law or of these *Standards*, and their prompt resolution, are critical to Juilliard's commitment to operating in a sound, ethical, and compliant manner.

Although we place great trust in our Trustees, officers, employees, and volunteers to comply with the law and Juilliard's business standards, there are unfortunately occasions when violations occur. Any Trustee, officer, employee, or volunteer who has direct knowledge of improper, fraudulent or illegal action taken by or within Juilliard should report such action to the Vice President for Administration & General Counsel, Maurice F. Edelson, who serves as the policy administrator and in such capacity reports to the Board's Audit Committee. Mr. Edelson can be contacted through his Juilliard office (60 Lincoln Center Plaza, Room 225, New York, NY 10023), or OGC@juilliard.edu.

Allegations involving sexual misconduct, however, should be reported in accordance with the School's *Sexual Misconduct Policy* which can be found on the [Title IX](#) page of the Juilliard website.

If improper, fraudulent or illegal action directly involves either the President or the Vice President for Administration & General Counsel, the matter is to be reported instead to the Chair of the Trustees' Audit Committee. This must be done in written form, anonymously or not, and sent to the Chair c/o of the Assistant Secretary's Office at Juilliard (60 Lincoln Center Plaza, room 203, New York, New York 10023).

The Vice President for Administration & General Counsel is responsible for investigating allegations reported to him. He shall report the results of any such investigation to the Audit Committee, through the Chair. Reasonable efforts will be taken to preserve the confidentiality of the party or parties involved, but disclosure of information may be necessary in order to conduct a proper investigation or to resolve the matter. The Audit Committee is responsible for investigating reports that are made to it through the Chair and for reporting the results to other

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board members, as deemed necessary or appropriate. The Vice President for Administration & General Counsel, or the Audit Committee, is authorized to secure other assistance internally or externally, to conduct an investigation, and to take corrective actions as appropriate.

No retaliatory action – such as intimidation, harassment, discrimination or adverse employment consequence – will be taken against any member of the Juilliard community who in good faith reports violations of the law or of the School's *Standards*.