

### Introduction

Musica Nova, Inc. requires directors, officers, volunteers, and contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of Musica Nova, Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable internal reporting of concerns so that Musica Nova, Inc. can address and correct them. It is the responsibility of all board members, officers, volunteers, and contractors to report concerns about violations of Musica Nova, Inc.'s code of ethics or suspected violations of law or regulations that govern Musica Nova, Inc.'s operations.

### No Retaliation

Retaliation against any board member, officer, volunteer, or contractor who in good faith reports an actual or suspected violation of law or regulation is contrary to the values of Musica Nova, Inc. Retaliation is subject to discipline up to and including termination.

### Reporting Procedure

Musica Nova, Inc. has an open door policy and expects all directors, officers, volunteers, and contractors to share their questions, concerns, suggestions or complaints regarding conflict of interest with the Compliance Officer, CEO, or a board member, who in turn has the responsibility to investigate all reported complaints.

### Compliance Officer

The Compliance Officer may be a board member, the Executive Director, or a third party designated by the board to receive, investigate, and respond to all complaints about unethical or illegal conduct, and to resolve such complaints. The Compliance Officer will notify the board of all complaints and their resolution.

### Accounting and Auditing Matters

Musica Nova, Inc.'s Compliance Officer shall immediately notify the Board of Directors of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing, and work the board until the matter is resolved.

### Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to inform the board and to conduct an adequate investigation.

### Handling of Reported Violations

Musica Nova, Inc.'s Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

### Adoption

This Policy approved and implemented by the Board of Directors on:

{Date}.

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