

Whistleblower Policy

This Whistleblower Policy of SPORTS for Exceptional Athletes (“SPORTS”): (1) encourages its directors, staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of SPORTS; (2) specifies that SPORTS will protect the person from retaliations; and (3) identifies where such information can be reported.

1. Encouragement of reporting. SPORTS encourages complaints, reports or inquiries about illegal practices or serious violations of SPORTS’ policies, including illegal or improper conduct by SPORTS, by its leadership or by others on its behalf. Appropriate subjects to raise under this policy include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which SPORTS has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment with the Associate Director, unless that channel is implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

2. Protection from retaliation. SPORTS prohibits retaliation by or on behalf of the corporation against its directors, staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. SPORTS reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

3. Where to report. Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to Sonnenberg & Co., CPAs. SPORTS will conduct a prompt, discreet and objective review or investigation. Directors, staff or volunteers must recognize that SPORTS may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

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Adopted by the Board of Directors on March 11, 2009