



## **Whistleblower Policy**

The Veteran Tickets Foundation Code of Conduct requires all directors, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

## **Reporting Responsibility**

Each director, volunteer, and employee of Veteran Tickets Foundation has an obligation to report in accordance with this Whistleblower Policy any of the following Concerns: (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of Veteran Tickets Foundation's Code of Ethics or (c) suspected violations of law or regulation that govern Veteran Ticket Foundation's operations.

## **No Retaliation**

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise Concerns within the Foundation for investigation and appropriate action. With this goal in mind, no director, volunteer, or employee who, in good faith, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. An employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment.

## **Reporting Procedure**

Employees are encouraged to share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Chief Executive officer or a board member. Concerns may be also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the Chief Executive Officer.

Directors and volunteers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Veteran Tickets Foundation's Chief Executive Officer.

## **Handling of Reported Violations**

The Chief Executive Officer has the responsibility to ensure that all Concerns about unethical or illegal conduct are investigated and resolved. The Chief Executive Officer will notify the person who submitted a Concern and acknowledge receipt of the reported violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. All Concerns on compliance activity relating to accounting or alleged financial improprieties will be immediately reported to the Chief Financial Officer and reported at least annually and the Board of Directors.



### **Acting in Good Faith**

Anyone filing a written complaint addressing a Concern of Veteran Tickets Foundation's Code of Conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment.

### **Confidentiality**

Reports of Concerns, and resulting investigations, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense.

Michael Focareto, US Navy Veteran  
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