

**WHISTLEBLOWER POLICY
OF
ARCADE STORM SOCCER CLUB, INC.**

**ARTICLE I
Purpose**

ARCADE STORM SOCCER CLUB, INC. (the “Corporation”) is committed to maintaining an environment where volunteers who provide substantial services to the Corporation (a “volunteer”), directors, employees and officers are free to raise good faith concerns regarding the Corporation’s business practices, specifically:

- (1) Reporting suspected violations of law on the part of the Corporation, including but not limited to federal laws and regulations;
- (2) Providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body; and
- (3) Identifying potential violations of the Corporation’s policy.

This Whistleblower Policy is intended to encourage and enable volunteers, directors, officers and employees to report suspected fraudulent, dishonest or illegal conduct and to raise serious concerns within the Corporation prior to seeking resolution outside the Corporation.

**ARTICLE II
Reporting a Violation**

The Corporation’s directors, officers, employees and volunteers should raise concerns with, and report violations to, a designated compliance officer of the Corporation (a “Compliance Officer”), or an officer or director whom the officer, employee director or volunteer is comfortable addressing. If for any reason an officer, director, employee or volunteer does not feel comfortable reporting the problem to an officer or other member of management, he or she should bring the matter directly to the Board of Directors. Officers and Directors are required to report fraudulent or dishonest conduct or violations of law to the Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations.

This Whistleblower Policy shall not apply to allegations made with reckless disregard for their accuracy. People making such allegations may be subject to disciplinary action by the Corporation, and/or legal claims by individuals accused of such conduct.

**ARTICLE III
No Retaliation**

The Corporation expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation against any employee who in good faith reports any action or suspected action taken by or within the

Corporation that is illegal, fraudulent or in violation of any adopted policy of the Corporation. Any employee who engages in retaliation will be subject to discipline, up to and including termination.

Any director, employee or volunteer who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of law or policy should immediately report the retaliation to the Compliance Officer or the person's immediate supervisor. Supervisors and managers who receive complaints of retaliation must immediately inform the Compliance Officer and the President. The Compliance Officer will acknowledge receipt of the report of retaliation within five business days.

ARTICLE IV Investigation

Reports of suspected violations of law or policy and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality, consistent with a full and fair investigation. The Compliance Officer will conduct or designate other internal or external parties to conduct the investigations. The investigating parties will notify the concerned individuals of their findings, and prepare other reports as indicated by the circumstances. A summary of all such reports will be presented to the Board of Directors.

In the event that a report of a suspected violation of law or policy or retaliation involves the Compliance Officer or an individual who reports to the Compliance Officer, the President or its designees will conduct the investigation.

ARTICLE V Compliance Officer

The Compliance Officer is responsible for investigating and resolving all reported complaints and violations and, at his or her discretion, shall advise the President and/or the audit committee. The Compliance Officer has direct access to the Board of Directors and is required to report to the audit committee at least annually on compliance activity.

ARTICLE VI Confidentiality

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

This policy was adopted on November 17, 2019 by the Board of Directors.

ARCADE STORM SOCCER CLUB, INC.
WHISTLEBLOWER POLICY ACKNOWLEDGMENT

I, Colleen Raiber, the undersigned

check one

Officer and/or Director

Employee

Volunteer who provides substantial services to
ARCADE STORM SOCCER CLUB, INC. (the "Corporation")
affirm that:

- a. I have received a copy of the Corporation's Whistleblower Policy;
- b. I have read and understand the Whistleblower Policy; and
- c. I agree to comply with the Whistleblower Policy.

Name: Colleen Raiber

Title: President