

Veteran Tickets Foundation Whistleblower Policy

Veteran Tickets Foundation (“FOUNDATION”) is committed to high standards of ethical, moral, and legal business conduct. The Foundation is further dedicated to acting in good faith with those employees who raise concerns regarding incorrect financial reporting, unlawful activity, or otherwise improper conduct.

This Whistleblower Policy aims to provide employees with an avenue for raising such concerns, and to reassure such employees that they will be protected from reprisal or victimization as a consequence of reporting the alleged wrongdoing of any officer, director, employee, or agent of the Foundation.

Statement of Policy

No officer, director, employee, or agent of the Foundation shall take any harmful action with the intent to retaliate against any person, including interference with employment or livelihood, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any offense. Nor will any officer, director, employee, or agent of the Foundation take any harmful action with intent to retaliate against any person for reporting to an appropriate senior management or elected official of the Foundation the suspected misuse, misallocation, or theft of any Foundation resources.

Safeguards

Harassment or Victimization – The Foundation will not tolerate the harassment or victimization of any employee who raises concerns under this policy.

Confidentiality– The Foundation will make every effort to treat a complainant’s identity with an appropriate regard for confidentiality, with the understanding that the details of complaints may need to be shared with others in order to investigate such complaints properly.

Anonymous Allegations - Because a thorough investigation often depends on an ability to gather additional information, the Foundation encourages complainants to put their names to allegations of wrongdoing. The Foundation will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

Bad Faith Allegations - Allegations made in bad faith may result in disciplinary action.

Procedure

Process for Raising a Concern:

Reporting-- The Foundation intends this policy to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting or unethical or illegal conduct, may be reported directly to the Executive Director or the Chair of the Audit Committee. In the event that an individual’s concern rises to the level that he/she reasonably believes that notice to Executive Director or Audit Committee Chair will be disregarded or otherwise not fairly considered, the

individual may then report violations or suspected violations to the Chairman of the Board. Employment-related concerns should continue to be reported through the Executive Director.

Timing – The earlier a concern is expressed, the easier it is to take action.

Evidence -- Although a complainant is not expected to prove the truth of an allegation, he or she should be able to demonstrate that he or she has made a report in good faith.

How the Report of Concern Will Be Handled:

Initial Inquiries -- The Executive Director will make initial inquiries in consultation with legal counsel, if necessary, to determine whether or not further investigation is necessary or appropriate.

Further Information – The Executive Director may seek further information from any officer, director, employee, or agent of the Foundation, and shall take all reasonable precautions to protect the identity of the complainant to the extent possible while doing so.

Reporting – The Board of Directors and the Audit Committee shall receive information on each complaint. In consultation with the Executive Director and, if necessary, legal counsel, the Board of Directors will determine an appropriate response to a report of concern. Officers, directors, employees, and agents of the Foundation who may be implicated in such reports shall not participate in any deliberation of the Board of Directors related to the complaint, except to present information directly to the Board on his or her own behalf.