



CLUB 100 CHARITIES, INC. WHISTLEBLOWER POLICY

1. Purpose.

Club 100 Charities, Inc., requires board members, committee members and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As directors, board members, committee members, volunteers and representatives of Club 100 Charities we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

2. Reporting Responsibility.

The Whistle Blower Policy is intended to encourage and enable volunteers of Club 100 Charities, Inc. and others to raise serious concerns internally so that Club 100 Charities can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers and volunteers to report concerns about violations of Club 100 Charities code of ethics or suspected violations of law or regulations that govern Club 100 Charities, Inc.

3. No Retaliation.

No board member, committee member, or volunteer who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation or adverse consequence. Any board member, committee member or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of his or her association with Club 100 Charities, Inc.

4. Reporting Procedure.

Club 100 Charities, Inc., has an open door policy and suggests that volunteers share their questions, concerns, suggestions or complaints with their supervisor. If uncomfortable speaking with the supervisor or they are not satisfied with the supervisors response, they are encouraged to speak with an Executive Board Member or Board Member. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to Club 100 Charities Compliance Officer or Executive Board of Directors.

5. Compliance Officer.

Club 100 Charities, Inc., President will act as the Organization's Compliance Officer. The Compliance Officer is responsible for ensuring that all complaints about the unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

6. Accounting and Auditing Matters.

Club 100 Charities, Inc., Compliance Office shall immediately notify the Audit Committee/Finance Committee of any concern or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

7. Acting In Good Faith.

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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.

8. 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.

9. Handling of Reported Violations.

Club 100 Charities, Inc., Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will 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.