WHISTLEBLOWER POLICY

General

Adaptive Sports Foundation requires directors, officers, employees and volunteers to comply with all applicable laws and regulations, observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the **Adaptive Sports Foundation**, we must adhere to all legal requirements and practice honesty and integrity in fulfilling our responsibilities.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to report legal, behavioral or ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, employee or volunteer who in good faith reports a violation of law or an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the **Adaptive Sports Foundation** prior to seeking resolution outside the **Adaptive Sports Foundation**.

Reporting Violations

Adaptive Sports Foundation has an open door policy and suggests that employees and volunteers share their questions, concerns, suggestions or complaints with the Executive Director. In most cases, the Executive Director is in the best position to address an area of concern. However, if you are not comfortable speaking with the Executive Director or you are not satisfied with the response, you are encouraged to speak with management whom you are comfortable in approaching. For suspected fraud, or when you are not satisfied or uncomfortable with following **Adaptive Sports Foundation**'s open door policy, individuals should contact **Adaptive Sports Foundation**'s Chairman.

Compliance Officer

The **Adaptive Sports Foundation**'s Compliance Officer is the Executive Director and is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the chairman and/or the audit committee. The Compliance Officer has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on compliance activity.

Accounting and Auditing Matters

The audit committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.**Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation 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.

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.

Handling of Reported Violations
The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Audit Committee Compliance Officer
Name: Vince Passione, ASF Board Chairman

Adaptive Sports Foundation Management Staff
Name and Title: John Iannelli, Executive Director

Policy Approved by the **Adaptive Sports Foundation** Board of Directors