

PHANTOM REGIMENT DRUM & BUGLE CORPS, INC.

Whistleblower Protection Policy

As part of Phantom Regiment Drum & Bugle Corps, Inc.'s (the "Corporation") commitment to upholding business ethics and standards, the Corporation has adopted a Whistleblower Protection Policy. For purposes of this policy, "whistleblower" is defined as any officer, director, employee, or independent contractor who reports an activity that he/she reasonably believes in good faith to be illegal, dishonest, discriminatory, fraudulent, or a violation of Corporation policy. Improper activities include, but are not limited to, violations of any state or federal law or regulation, corruption, malfeasance, bribery, theft or misuse of Corporation property or facilities, fraud or fraudulent claims, false financial reporting, harassment, threats or retaliation against any employee, and activities that involve gross misconduct, gross incompetence, gross inefficiency, or willful omission to perform duty.

Employees and independent contractors should report improper activity, in writing, to the Corporation's Executive Director or designee. If the Executive Director is involved in the improper activity, employees and independent contractors should report the activities directly to the Corporation's Board Chair or to a member of the Corporation's Board of Directors.

In all cases, a full account of the report, follow-up investigation, and resolution will be provided to the employee/independent contractor and to the Board of Directors. Reports and investigations shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosers of reports to individuals not involved in the investigation will result in disciplinary action, up to and including termination of employment/contract (as in the case of independent contractors).

Reports made with knowledge of their falsity, in whole or in part, are strictly prohibited and may result in disciplinary action. Any individual, who in good faith, reports an improper activity, even if the report is mistaken, or who assists in the investigation of a reported improper activity, will be protected by the Corporation and by the Corporation's Board of Directors.

Retaliation against whistleblowers will not be tolerated. Retaliation includes discharge, demotion, suspension, threat, harassment, or any manner of discrimination against any employee in the terms and conditions of employment based on the filing of a report or assistance in the investigation of a report. Any person who retaliates against a whistleblower will be subject to disciplinary action, up to and including termination of employment.

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