

Whistleblower Protection Policy of the Classic Yacht Association

("the Association")

Adopted by the Board of Directors on June 14, 2020

The Classic Yacht Association requires directors and officers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members and representatives of the Classic Yacht Association, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable members and others to raise serious concerns internally so that Classic Yacht Association 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 Classic Yacht Association's code of ethics or suspected violations of law or regulations that govern Classic Yacht Association's operations.

No Retaliation

It is contrary to the values of Classic Yacht Association for anyone to retaliate against any board member, officer or member who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Classic Yacht Association. A member who retaliates against someone who has reported a violation in good faith is subject to consequences up to and including termination of membership.

Reporting Procedure

Classic Yacht Association has an open door policy and suggests that members share their questions, concerns, suggestions or complaints with their fleet officers. If they are not comfortable speaking with their fleet officers or are not satisfied with the officer's response, they are encouraged to speak with a Board member. Fleet and Association officers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Association Commodore, who has the responsibility to investigate all reported complaints. The Classic Yacht Association's Commodore is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Commodore will advise the Board

of Directors of all complaints and their resolution and will report at least annually to the Board on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The Classic Yacht Association's Financial Review and Comment Committee members shall immediately notify the Association Commodore of any concerns or complaint regarding corporate accounting practices, internal controls, or auditing, and will work with the Commodore until the matter is resolved

Acting in Good Faith

Anyone filing a written 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 offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. 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 Classic Yacht Association's Commodore will notify the person who submitted a complaint and 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.

Compliance Officer:

The Compliance Officer shall be the Association Commodore, or a third party designated by the Board of Directors to receive, investigate, and respond to complaints.