

I. Purpose and Scope

The Cavaliers Drum & Bugle Corps, Inc. ("CDC") requires the directors, volunteers, employees and members of the CDC and its affiliates to act ethically, practice honesty and integrity, and comply with all applicable laws, regulations and ordinances.

CDC hopes that all will feel free to raise concerns with CDC. CDC recognizes the need to provide a mechanism for the confidential and anonymous submission of such concerns, to provide CDC full opportunity to investigate and address potential violations of policy, law or ordinance.

The purpose of this Whistleblower Policy is to establish policies and procedures for:

- Submitting concerns from employees, directors, officers, members and other stakeholders on a confidential and anonymous basis regarding anything against the policies of the organization, including but not limited to:
 - Questionable accounting or auditing matters;
 - Questionable business ethics;
 - Conflicts of interest;
 - Acceptance, provision or solicitation of bribes or kickbacks;
 - Legal or regulatory violations;
 - Unsafe practices or activities which unnecessarily endanger health or safety;
 - Bullying or harassment; and
 - Other actions which potentially compromise the integrity of CDC;
- The receipt, retention and treatment of concerns raised; and
- The protection of individuals raising concerns, and their families, from retaliatory actions.

II. Reporting Responsibility

- Every director, volunteer, member and employee of CDC and its affiliates has an obligation to report issues as listed in Section I above.
- Reports shall be made to the Compliance Officer and Vice President of the CDC's Board of Directors (the "Board").
- To ensure a confidential forum for reporting concerns, complaints and issues, CDC has established a mechanism on its website, www.cavaliers.org, to enable anyone to send an anonymous message directed to both the Compliance Officer and Chairman of the Board.
- While a report may be submitted anonymously, the reporting person should understand that anonymity might impede CDC's ability to conduct a complete investigation.
- Should the Compliance Officer and/or Chairman of the Board be potentially involved in the reported issue, such issue shall be reported to any member(s) of the Board.

III. Investigation

- On a case-by-case basis, the Board shall determine appropriate action. This may include appointing a committee of Board members to conduct an investigation, report the findings of such investigation back to the Board, and recommend appropriate corrective action.
- The Compliance Officer or other individual designated by the Chairman of the Board shall coordinate investigative and procedural activities. Should the Compliance Officer and Chairman of the Board be potentially involved in the issue, the Board shall appoint a member of the Board to coordinate activities.

IV. Retaliation

CDC will not retaliate, and prohibits retaliation by its directors, volunteers, members, employees and representatives, against anyone who makes a report in good faith under this Whistleblower Policy.

CDC reserves the right to take action against anyone who makes a report based upon false or misleading information, or without a reasonable basis for believing any wrongdoing has occurred.

V. Employee Responsibilities

Nothing in this Whistleblower Policy is intended to abrogate any duties CDC employees owe CDC, under any applicable laws, regulations or ordinances, to disclose, report violations (or suspected violations) of law or policy, cooperate fully in any investigations, including investigations of harassment, or to fulfill their duty of loyalty to CDC.