

Whistleblower Policy:

The Navy SEAL Museum San Diego is committed to providing the best possible working conditions for its employees and as part of this commitment encourages an open and honest atmosphere in which any problem, complaint, suggestion, or question receives a timely response. To this end, the Navy SEAL Museum San Diego has enacted a "whistle blower" policy to protect any employee who reports what he or she believes in good faith to be an action, practice, or policy that:

- Appears questionable or suspicious in nature with respect to the Navy SEAL Museum San Diego's finances or the Navy SEAL Museum San Diego's obligation to comply with applicable laws and regulations or violates any state or federal law or regulation (e.g., corruption, malfeasance, bribery, theft or misuse of property, fraud, or coercion).
- Involves an unjustified expenditure of funds; or involves gross misconduct, gross incompetence, or gross inefficiency (hereinafter collectively referred to as "Financial and Legal Matters").
- Unethical conduct, including but not limited to a conflict of interest

This policy further ensures that there shall be no form of retaliation taken against an employee who makes such a report. In situations where conduct constitutes a Harassment or EEO Discrimination, the employee should immediately contact their supervisor. However, if the complaint involves their supervisor, then they should contact the COO or the Board Chair.

Employee Concerns and Complaints

Each employee of the Navy SEAL Museum San Diego has the individual responsibility to report complaints or concerns regarding Financial and Legal Matters promptly.

Navy SEAL Museum San Diego suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to direct concerns and/or complaints regarding Financial and Legal Matters to the Whistleblower Email. The Whistleblower Email will be an independent email established by Navy SEAL Museum San Diego, monitored by the Compliance Officer(s) and under the guidance of the Finance Committee, as a mechanism for anonymous and confidential reporting of concerns and complaints regarding Financial and Legal Matters. The Whistleblower Email shall be checked on a regular basis and the concerns and complaints that are reported shall be forwarded to the Chair of the Finance Committee as soon as practicable.

Whistleblower Email: compliance@navysealxperience.org

For concerns and complaints regarding conduct which falls under Harassment or EEO Discrimination, follow the steps cited above. However, employees have the option to report complaints or concerns regarding these matters to the Whistleblower Email as well.

New employees will be instructed on reporting procedures when hired and the information will be posted on the Navy SEAL Museum San Diego website.

Protection against Retaliation

The Navy SEAL Museum San Diego is committed to the policy that no one will be subject to retaliation because of a good faith report of a concern or complaint regarding Financial and Legal Matters, including any alleged violation of law or policy. This policy extends to discrimination against employees in any of the terms and conditions of their employment, including but not limited to job assignment, promotion, compensation, training, discipline, and termination, because of a good faith report. Any suspected acts of retaliation must be reported immediately to the Whistleblower Email or the Finance Committee Chair.

Submission of Concerns and Complaints by Interested Parties other than Employees

Submission of complaints and concerns regarding Financial and Legal Matters may be submitted by individuals not employed by the Navy SEAL Museum San Diego ("Interested Parties"). Interested Parties may communicate concerns and complaints regarding Financial and Legal Matters by regular mail sent to:

Compliance Officer
Navy SEAL Museum San Diego, LLC
910 North Harbor Drive
San Diego, CA 92101

Procedures for reporting of concerns or complaints relating to Financial and Legal Matters from Interested Parties will be posted in an appropriate section on the Navy SEAL Museum San Diego's website.

Compliance Officer

The Compliance Officer (s) is responsible for ensuring that all complaints about 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 Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

Treatment of Concerns and Complaints

Upon receipt of a concern or complaint relating to Financial and Legal Matters, from whatever source, the Compliance Officer(s) will, to the extent practicable, acknowledge receipt of the concern or complaint to the person who submitted it. Further, the Compliance Officer will inform the Finance Committee of all reported concerns and complaints relating to Financial and Legal Matters as appropriate.

Investigations of Concern and Complaints

The Compliance Officer, with assistance from Finance Committee members if so desired, will investigate any report regarding Financial and Legal Matters and concerns relating to defalcations, thefts, or fraud (1) on his or her own, (2) with any other senior management employee of the Navy SEAL Museum San Diego he or she deems appropriate, (3) outside counsel, or (4) an outside party, auditor or consultant he or she deems appropriate. The Finance Committee's authority to investigate does not preclude an investigation by senior management or other appropriate persons.

Confidentiality will be maintained to the extent reasonably practicable, consistent with applicable law and policy. The need to conduct an adequate investigation may be necessary to determine resolution of the matter or corrective action.

Corrective Action

If the investigation of the concern or complaint indicates that a violation of law, regulations or policy has occurred, the Compliance Officer(s) may present the findings of the investigation to senior management who will determine appropriate disciplinary measures or other corrective action. Senior management shall inform the Finance Committee Chair of its decision regarding disciplinary measures or corrective action prior to implementing such measures. The Finance Committee Chair may confer with senior management regarding the appropriateness of the disciplinary measures or corrective action proposed.

Reporting and Retention of Matters and Investigations

The Compliance Offices(s) will maintain a log of all concerns and complaints that relate to Financial and Legal Matters and concerns relating to defalcations, thefts or fraud that are received. The Compliance Officer shall track the receipt, investigation, and resolution of all such concerns and complaints, and the Officer shall provide periodic reports thereof to the Finance Committee.

Copies of records relating to concerns and complaints received will be maintained in accordance with the Navy SEAL Museum San Diego's records retention policy.