Based upon the bylaws the SEAMAN ATHLETIC BOOSTER CLUB shall maintain the following policies, and such other policies which may be approved from time-to-time:

- 1. Conflict of Interest Policy
- 2. Non-Discrimination Policy
- 3. Compensation Policy
- 4. Whistleblower Policy

Adoption, Amendment and Review of Policies

All policies of the SEAMAN ATHLETIC BOOSTER CLUB, and any amendments thereto, must be approved first by a majority of a quorum of the Executive Committee. Upon approval by the Executive Committee, the policy shall then be subject to approval by a majority of a quorum of the membership at a regular meeting of the membership. The Executive Committee shall review all policies of the SEAMAN ATHLETIC BOOSTER CLUB annually.

Policy 1 - CONFLICT OF INTEREST

The purpose of the conflict of interest policy is to protect this SEAMAN ATHLETIC BOOSTER CLUB interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an interested person of the SEAMAN ATHLETIC BOOSTER CLUB or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Definitions

Interested Person

Any officer or agent, including a member of a Committee with SEAMAN ATHLETIC BOOSTER CLUB delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

Financial Interest

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

An ownership or investment interest in any entity with which the SEAMAN ATHLETIC BOOSTER CLUB has a transaction or arrangement,

A compensation arrangement with the SEAMAN ATHLETIC BOOSTER CLUB or with any entity or individual with which the Club has a transaction or arrangement, or

A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the SEAMAN ATHLETIC BOOSTER CLUB is negotiating a transaction or arrangement.

Compensation

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

Procedures

Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the officers and members of Committees with SEAMAN ATHLETIC BOOSTER CLUB delegated powers considering the proposed transaction or arrangement.

Determining Whether a Conflict of Interest Exists

After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the meeting while the determination of a conflict of interest is discussed and voted upon by the Executive Committee. The remaining officers shall decide if a conflict of interest exists. A financial interest is not necessarily a conflict of interest. A person who has a financial interest may have a conflict of interest only if the Executive Committee decides that a conflict of interest exists.

Procedures for Addressing the Conflict of Interest

An interested person may make a presentation at the Executive Committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.

The President shall, if appropriate, appoint a disinterested person or Committee to investigate alternatives to the proposed transaction or arrangement.

After exercising due diligence, the Executive Committee shall determine whether the SEAMAN ATHLETIC BOOSTER CLUB can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Executive Committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the SEAMAN ATHLETIC BOOSTER CLUB's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

Violations of the Conflicts of Interest Policy

If the Executive Committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Executive Committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Policy 2 – NON-DISCRIMINATION

Membership in the SEAMAN ATHLETIC BOOSTER CLUB and participation in its affairs shall be open to any person without regard to religion, race, color, sex, national origin, age, marital status, sexual orientation, disability or other legally class or category. Within the limitation imposed by the facilities available to the SEAMAN ATHLETIC BOOSTER CLUB and the desirability of harmonious association among its members, any person who meets the requirements as determined by the Executive Committee is eligible to hold a membership.

The SEAMAN ATHLETIC BOOSTER CLUB shall maintain a nondiscrimination policy which conforms with the requirements of Federal, state and local laws and regulations.

Policy 3 – COMPENSATION

No part of the net earnings of the SEAMAN ATHLETIC BOOSTER CLUB shall inure to the benefit of or be distributable to its members, trustees, officers or other private persons, except that the SEAMAN ATHLETIC BOOSTER CLUB shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in the SEAMAN ATHLETIC BOOSTER CLUB bylaws.

Policy 4 – WHISTLEBLOWER

SEAMAN ATHLETIC BOOSTER CLUB is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its officers, members, or volunteers. This policy outlines a procedure for officers, members, or volunteers to report actions that an officer, member, or volunteer reasonably believes violates a law, or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter which is related to SEAMAN ATHLETIC BOOSTER CLUB's business and does not relate to private acts of an individual not connected to the business of SEAMAN ATHLETIC BOOSTER CLUB.

If an officer, member, or volunteer has a reasonable belief that any person affiliated with SEAMAN ATHLETIC BOOSTER CLUB has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the officer, member, or volunteer is expected to immediately report such information to the Seaman Athletic Booster Club President If the officer, member, or volunteer does not feel comfortable reporting the information to the President, he or she is expected to report the information to the Vice President.

All reports will be followed up promptly, and an investigation conducted. In conducting its investigations, SEAMAN ATHLETIC BOOSTER CLUB will strive to keep the identity of the complaining individual as confidential as possible, while conducting an adequate review and investigation.

SEAMAN ATHLETIC BOOSTER CLUB will not retaliate against an officer, member, or volunteer because that officer, member, or volunteer: (a) reports to a supervisor, to the executive director, the Executive Committee or to a federal, state or local agency what the employee believes in good faith to be a violation of the law; or (b) participates in good faith in any resulting investigation or proceeding, or (c) exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee's rights.

SEAMAN ATHLETIC BOOSTER CLUB may take disciplinary action (up to and including removal from the organization) against an officer, member, or volunteer who in the Executive Committee's assessment has engaged in retaliatory conduct in violation of this policy.

In addition, SEAMAN ATHLETIC BOOSTER CLUB will not, with the intent to retaliate, take any action harmful to any person who has provided to law enforcement personnel or a court truthful information relating to the commission or possible commission by SEAMAN ATHLETIC BOOSTER CLUB or any of its officers, members, or volunteers of a violation of any applicable law or regulation.

Officers will be trained on this policy and SEAMAN ATHLETIC BOOSTER CLUB'S prohibition against retaliation in accordance with this policy.