

Front Runners New York, Inc.

Procedure on Reporting Policy Violations and Anti-Retaliation Policy

Adopted November 19, 2015

Amended December 10, 2023

To ensure that **Front Runners New York, Inc.** (hereinafter, the “Organization”) maintains a safe and welcome environment for everyone, the following sets forth the procedure for reporting conduct that violates the Organization’s policies, including but not limited to, its Anti-Harassment, Unethical or Illegal Conduct, and Sportsmanship Policies (hereinafter, collectively, “Policies”), and further establishes the Organization’s policy against retaliation for reporting, in good faith, conduct believed to violate the Organization’s Policies.

If any director, officer, or club member, or person associated with the club, knows or has a reasonable belief that a person or persons associated with the Organization has violated the Organization’s Policies, that person should file a complaint immediately.

A complaint may be made either orally or in writing and shall be made to a member of the Board. A complaint may be made “confidential” in accordance with the conditions set forth herein. Any member of the Board receiving a complaint concerning a possible violation of the Organization’s Policies shall promptly prepare a written detailed report.

After receiving a complaint and preparing a written detailed report, that member of the Board shall immediately provide the report to the President. However, if the actions or allegations underlying the complaint involve the President, then the Board member taking the complaint and summary shall report it to the Vice President. The member of the Board taking and reporting the complaint, together with the President (or Vice President) shall take all reasonable efforts necessary to ensure that the person or persons complained of, or involved in the actions or allegations underlying the complaint, is not so informed of the complaint in the first instance until the President (or Vice President) makes a determination as to the potential course of action with regard to an investigation into the accusation(s).

The President (or Vice President) shall determine whether the allegations complained of should be reviewed by counsel, and if so, shall promptly confer with counsel as to the appropriate course of action.

Nothing contained in this policy shall limit the right of any director, officer, or club member, or any person associated with the club, to report a complaint known or believed to have violated the Organization’s Policies, or any law, rule, or regulation, to any enforcement authority or agency.

Regardless of whether or not the President (or Vice President) chooses to confer with counsel as to the allegation(s), unless advised otherwise by counsel, they shall report

the complaint and allegation(s) to the Board promptly, and confer with the Board as to the appropriate course of action, including but not limited to, the conducting of interviews of the person or persons making the complaint, any known witness to the conduct underlying the complaint, and the person or persons complained of. All members of the Board charged with any portion of the investigation into the complaint shall document their findings and report them to the President (or Vice President). All investigation reports and findings shall remain confidential, and shall not be disclosed to any individual or entity outside the Board, unless required to do so in aid of a complaint made to a law enforcement agency, in response to a lawful subpoena, or to any of the Club's service providers as needed to investigate the complaint or to fulfill any obligation to such service provider, or as the Board deems necessary in the event the matter under investigation is the subject of a civil or criminal action.

Upon the completion of its investigation into the complaint, the President (or Vice President) shall make a recommendation to the entire Board as to what action, if any, the Organization should take in response to its findings, which may include, but is not limited to, a written warning to, or suspension or expulsion from the Organization any person(s) found to have violated the Organization's Policies. The Board shall make a final determination as to the appropriate sanction, if any. However, no member of the Board found to have been involved in the conduct complained of shall be part of any final determination.

Furthermore, in order to promote the free and confidential exchange of information which may form the basis of a complaint, no director, officer, or club member shall take any action harmful to any person who, in good faith, reports a suspected violation of any of the Organization's Policies. Nor shall any director, officer, or club member take any action that is harmful to any person who provides information to a member of the Board in connection with its investigation into a complaint, or against anyone who participates in, or assists the investigation or adjudication of a complaint. A complaint that the foregoing provision against retaliation has been violated shall be subject to the same procedures and discipline as set forth above.

The foregoing shall not, in any way, alter the Organization's Conflict of Interest Policy.