

**DAV CHARITABLE SERVICE TRUST (“Corporation”)
REPORTING OF FINANCIAL AND GOVERNANCE IMPROPRIETIES**

The Corporation is committed to legal compliance and exemplary integrity in its financial management and corporate governance.

The Corporation encourages DAV personnel and all other individuals who may be involved with its activities to inform the organization about unlawful or improper behavior including, but not limited to, any of the following: (1) theft or improper use of assets; (2) materially misleading financial reporting; (3) violation of the Corporation’s conflict of interest and nondiscrimination policies or other policies or procedures relating to corporate governance; and (4) improper destruction of records.

Although it is hoped and expected that such improprieties will be extremely infrequent, it is critical that the Corporation be informed of any deviations from standards of financial management or corporate governance. A prompt report is requested from anyone who has a reasonable suspicion about any illegal, unethical or improper conduct involving the finances or governance of the Corporation. Such good-faith reports can be made without fear of retaliation. Anyone making such reports will suffer no adverse actions. Naturally, given the seriousness of these matters and the effect of a careless accusation, the Corporation expects individuals to use this procedure in a thoughtful, careful and responsible manner.

Making a Report

Reports of improprieties in financial management or corporate governance may be made to any of the persons listed below, and should be made in writing. Anonymous complaints will be accepted although, for obvious reasons, it is better for the complaining person to identify herself/himself and supply contact information. All reports will be handled on a confidential basis to the degree possible.

Complaints should be submitted in a sealed envelope marked “PERSONAL AND CONFIDENTIAL: TO BE OPENED BY ADDRESSEE ONLY” and delivered in-person or by mail to the President, the Vice President or the Secretary at the following address:

860 Dolwick Drive
Erlanger, KY 41018

This policy is to be provided annually to all DAV personnel involved with administering the Corporation’s business activities, the Corporation’s elected officials including, without limitation, members of its Board of Directors and Advisory Committee(s), if any, and posted for ease of accessibility in an appropriate place on the Corporation’s website.

The above Policy was adopted by the Board of Directors on August 10, 2015 and will remain in effect until amended or rescinded.