



CHAMP Camp, Inc. Policy for Reporting Compliance Concerns

Overview

This policy is for employees to identify concerns about actual or potential violations of legal and regulatory requirements regarding financial reporting and disclosure requirements, preparation of financial statements, accounting practices, internal accounting controls, financial audit matters, matters concerning fraud against the Company, or inappropriate use of its resources. Failure to report a violation of this type may subject an employee to discipline.

Submitting A Report

The Board of Directors of CHAMP Camp, Inc. (the "Board") and the Management of CHAMP Camp, Inc. ("Management") respects its employees' legal right to report this type of actual or suspected unlawful activity directly to government agencies or management. Alternatively, employees may report concerns through the chain of command. If you cannot foresee resolving your concerns through your chain of command, you may report them through the following procedure.

You may submit a **written report** confidentially and anonymously, through internal or regular mail or may be delivered in person to the President of the CHAMP Camp, Inc. Board of Directors. Mark the envelope "*Confidential and Private.*" Include a telephone number at which you may be contacted. You may submit the report anonymously, but that may make investigation more difficult.

Reports should be factual and contain as much specific information as possible to allow a proper assessment. This is particularly critical if you submit your report anonymously.

Handling Reports

The President of the CHAMP Camp, Inc. Board of Directors, or his/her designee, will determine whether a reasonable basis exists for beginning an investigation. To assist in making this determination, the President of the CHAMP Camp, Inc. Board of Directors may conduct an informal inquiry. To the extent possible, all reports will be handled confidentially.

The President of the CHAMP Camp, Inc. Board of Directors will report quarterly to the Board all reports submitted since the last report, including his/her determination and the results, if any, of any informal investigations.

If the Board determines that a reasonable basis exists for initiating a formal investigation, the Board will appoint a member of the Board to lead an investigation. In conducting the investigation, the Board may retain outside legal or accounting expertise. The President of the Board will oversee all investigations. When appropriate, the employee submitting the report will be informed of the status of the investigation and the outcome.

The Board together with input from outside legal or accounting expertise, if requested, will determine any appropriate corrective action. It is the responsibility of the President of the CHAMP Camp, Inc. Board of Directors to report to the Board any noncompliance with legal and regulatory requirements and to assure that the Board takes the corrective action.

No Retaliation

The Board and Management will not retaliate or discriminate against an employee for reporting in good faith to federal or state authorities, the Board, or to the Management or for participating in or assisting in any proceeding or investigation of a report.

All reports of retaliation will be promptly and thoroughly investigated. When the investigation is completed and a determination regarding the alleged retaliation made, the fact that appropriate action was taken will be communicated to the reporting employee and to the employee(s) accused of the retaliation.

If CHAMP Camp, Inc. determines that an individual has suffered adverse action in retaliation for seeking advice, raising a concern, reporting misconduct, or participating in an investigation or proceeding related to potential misconduct, it will take effective remedial action and will also take action to deter future retaliation.

This policy does not, in any manner, prevent employees from filing a complaint with, providing information to, or participating in an investigation conducted by, the Securities and Exchange Commission, the United States Equal Employment Opportunity Commission or any other governmental or law enforcement agency.