

## **Whistle Blowing Policy**

YTB International, Inc. strives to comply with all applicable laws. It expects and encourages all employees to report any suspected violation by contacting the general counsel, the director of human resources, any officer of the company, or any member of the board of directors. Employees may report suspected illegal conduct in person or by voicemail or e-mail.

Usually, the general counsel will investigate all reports and will promptly correct any problems. Individuals with expertise in the area of concern, such as accounting or information technology, will be used as needed. Information provided by the reporting employee will be treated as confidential and will be provided only to those who have the need for the information or when it is required in the course of investigating the concern or resolving the concern. False information provided in the course of an investigation may lead to discipline, including discharge.

Employees who fail to report violations of applicable laws are subject to discipline, which may include discharge.

YTB prohibits any retaliation against employees who provide information to or assist in an investigation of any violations of applicable laws.

Any officer, employee, or agent, or any contractor or subcontractor of YTB who retaliates against such employees is subject to discipline, up to and including termination.

Employees may make anonymous complaints by calling toll free at 1.866.233.5460 or via email by going to [ytbla@openboard.info](mailto:ytbla@openboard.info). This is an outside service that will be handling these calls confidentially. All complaints are directed to the Chairman of the Audit Committee, Fred E. Lutzeier, an independent member of the Board of Directors. Based on the allegation, the Audit Committee Chair will form a committee to review, investigate, and promptly correct any problems. This committee will record concerns received and the follow-up actions taken to investigate and respond to each concern.