

ARCHDIOCESE OF CINCINNATI ETHICS AND CONDUCT POLICY

Policy:

The successful operation and reputation of the Archdiocese and its Affiliates (defined as any entity that is subject to the administrative authority of the Archbishop of Cincinnati under Canon Law) is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The Archdiocese and its Affiliates will comply with all applicable laws and regulations and expects its employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct. (See also, Conflict of Interest Policy.)

Standards:

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor. The Human Resources Director is also available for advice and consultation.

Compliance with the Ethics and Conduct Policy is the responsibility of every Archdiocesan/Affiliate employee. Disregarding or failing to comply with the Ethics and Conduct Policy could lead to disciplinary action, up to and including termination of employment.

Procedure:

A. The following procedures will be used for reporting illegal and unethical violations.

Hotline - For reporting financial misconduct:

1. The Archdiocese and its Affiliates have selected [EthicsPoint](#), an independent third party company, to institute a hotline so employees, volunteers, parishioners, vendors and other interested parties can report concerns about financial misconduct.
2. The hotline provides a simple, risk-free means for reporting financial misconduct by calling 1-888-389-0381 or logging onto www.catholiccincinnati.org (Archdiocesan website) which has a direct link to EthicsPoint.
3. The hotline is manned 24/7 by call center specialists trained to handle complaints related to financial misconduct which can include: accounting and auditing matters, disclosures of confidential information, conflicts of interest, donor stewardship issues, embezzlement or theft and falsification of contracts, financial records or reports.

In-House - For reporting all other non-financial, illegal and unethical violations:

4. The employee is to contact his/her immediate supervisor or the Human Resources Director if he/she has knowledge of any violations, or suspected violations, of any Archdiocese/Affiliate policy, or of any illegal, dishonest or unethical conduct. If an employee is not comfortable speaking with his/her supervisor or the Human Resources Director, or if an employee believes that his/her concern has not been addressed, the employee is encouraged to speak with a Department Director of the Archdiocese.

General procedures that apply to hotline and in-house complaints:

5. All inquiries will be handled promptly and discretely. Individuals have the right to remain anonymous, and confidentiality will be maintained insofar as is possible. **However, no accusations will be pursued that are based exclusively on an anonymous source (must provide supporting evidence).**
6. Reports of violations or suspected violations will be kept in confidence to the extent possible, consistent with the need to conduct an adequate investigation. The employee's identity also may have to be disclosed in order to comply with the law and to provide accused individuals with their legal rights of defense.
7. No individual who in good faith reports a violation or suspected violation, shall be subject to harassment or retaliation by the Archdiocese/Affiliates or any of its employees or agents, nor will he/she suffer adverse employment consequences relating to his/her complaint.
8. Any employee who retaliates against an individual who has reported a violation or suspected violation in good faith shall be subject to discipline up to and including termination of employment. This policy is intended to encourage and enable individuals to raise serious concerns within the Archdiocese/and its Affiliates prior to seeking outside resolution.

B. Reasonable Grounds for filing a complaint

1. Any employee filing a complaint concerning a violation or suspected violation must act in good faith and exercise sound judgment to avoid baseless allegations. An employee should have reasonable grounds for believing that a violation has occurred or may occur. Allegations that prove to be false or unsubstantiated and which have been made with malice, recklessness or willful misconduct shall be subject to discipline, up to and including termination of employment.

Financial misconduct reported on hotline:

2. Reports filed will be confidentially reviewed by Archdiocesan Department Directors. The Department Directors shall make a determination as to whether a reasonable basis exists for commencing an investigation into the complaint. The Department Directors may determine not to commence an investigation if the complaint contains only unspecified or broad allegations of wrongdoing without appropriate informational support or sufficient corroborating information. If Department Directors determine that sufficient evidence exists for commencing an investigation, the appropriate administrator, principal, or pastor will be notified. The Director of

Finance and the responsible administrator will be responsible for investigating and establishing an ongoing communication with the individual who initiated the report.

All other non-financial illegal and unethical violations reported in-house:

3. Reports filed will be confidentially reviewed by the appropriate administrator, principal, or pastor (responsible administrators) to make a determination as to whether a reasonable basis exists for commencing an investigation into the complaint. The responsible administrator may determine not to commence an investigation if the complaint contains only unspecified or broad allegations of wrong doing without appropriate informational support or sufficient corroborating information. The responsible administrator will be responsible for investigating and establishing an ongoing communication with the individual who initiated the report.

C. Enforcement

1. The Archdiocese and its Affiliates intend to enforce the policy set forth and expect every employee to comply with the guidelines. If it is determined that illegal or unethical conduct has occurred, all necessary steps will be taken to assure that such illegal or unethical violation is rectified and appropriate remedial and/or disciplinary action is taken.
2. Failure to comply with any of the provisions of this [Ethics and Conduct Policy](#) will be grounds for discipline, up to and including termination.
3. Administrators can download the [Ethics and Conduct Policy](#) and [Ethics and Conduct Statement](#) from the Archdiocesan website www.catholiccincinnati.org, click on "Offices of the Archdiocese," click on Human Resources Office and select "Ethics and Conduct Policy and Ethics and Conduct Statement."
4. Each employee must sign the Ethics and Conduct Statement. This Statement will be filed in the employee's personnel file folder.