



Archdiocese of Agana

CHANCERY OFFICE

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Protocol No.: 2017 - 054

WHISTLEBLOWER POLICY

Archdiocese of Agana Policy to Report Wrong-doing

The Archdiocese Of Agana Code of Conduct requires all representatives of the Church, including clergy, religious, directors, volunteers, lay employees and others to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All representatives of the Church must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the Policy to Report Wrong-doing are to establish policies and procedures for:

- The submission of concerns regarding questionable financial or legal matters, violations and suspected violations of the Code of Conduct, Code of Canon Law and other concerns by the stakeholders of the Church, on a confidential and anonymous basis;
- The receipt, retention, and treatment of complaints received by the organization;
- The protection of anyone reporting concerns from retaliatory actions.

Reporting Responsibility

Each representative of the Archdiocese of Agana has an obligation to report in accordance with this policy (a) questionable or improper accounting or auditing matters, (b) violations and suspected violations of Archdiocese's Code of Conduct and (c) other financial, legal or canonical concerns (hereinafter collectively referred to as Concerns).

Reports of Concerns should be made to Archdiocesan personnel as designated by the Archbishop, i.e., vicar general, chancellor, attorney, chief financial officer or internal auditor. All Concerns are to be reported as soon as possible. Reports of Concerns should include all relevant information about the suspected act, including any material evidence that exists.

No Retaliation

This policy is intended to encourage and enable stakeholders to raise Concerns within the organization for investigation and appropriate action. With this goal in mind, no stakeholder who, in good faith, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, anyone who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from their position within the Church.

Investigation

The designated Archdiocesan personnel shall be responsible for a thorough and expeditious investigation of the reported Concern.

Proposed decisions on disposition of a case will be discussed with the Archbishop or his designee(s). The results of all reported Concern investigations and the final resolution shall be reported to the audit committee.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the Code of Conduct or other management policies. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from their position with the Church. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of the violator's position in the Church. Such conduct may also give rise to other actions, including civil lawsuits.

By signing below, I hereby acknowledge that I have completely read and fully understand the Archdiocese of Agaña's Whistleblower Policy.

Employee Signature

Supervisor Signature

Date: _____