

WHISTLEBLOWER POLICY (the "Policy")

I. PURPOSE

The Greek Orthodox Archdiocese of America (the "Archdiocese"), to the extent consistent with its status as a religious corporation, is committed to compliance with applicable state and Federal law. In addition, the Archdiocese recognizes that it is in the best interests of the Church to promote transparency and high standards of conduct and ethics with respect to Archdiocesan administrative and financial activities and practices.

The Archdiocese will receive complaints, investigate, and take action it deems appropriate in matters including, but not limited to, instances of suspected: (1) fraud, waste and/or abuse of its resources; (2) theft and/or other related misconduct; (3) violation of its Regulations, guidelines and/or policies, including, but not limited to, its Conflicts and Related Party Transactions Disclosure Policy; and (4) harassment or retaliation and/or other misconduct, by clergy or lay employees, officers, directors, contractors, volunteers, or Archdiocesan Council, Metropolis Council and Parish Council members, (collectively, "Violations"). The Faithful and other affected individuals are encouraged to report potential Violations pursuant to the procedures set forth below.

This Policy applies to the entire Greek Orthodox Archdiocese of America, including metropolises and parishes.

II. PROCEDURES

A. Administration of Policy

The Chancellor of the Archdiocese (the "Chancellor"), and the General Counsel of the Archdiocese (or in the absence of a General Counsel, the Chair of the Legal Committee of the Archdiocese) ("Legal Counsel") are designated to administer the Policy and to report to the Executive Committee of the Archdiocese any material Violations, as well as significant actions taken under this Policy.

B. Reporting of Complaints

Complaints under this Policy shall be submitted through a third party hosted website <https://goarch.ethicspoint.com/> established by the Archdiocese to receive all "whistleblower" complaints (the "Reporting Mechanism"). Notwithstanding anything to the contrary in this Policy, any individuals who are alleged to have committed a Violation shall recuse themselves from the administration of the investigation into that Violation. Any questions or concerns in this regard shall be referred to Legal Counsel.

This Policy shall not be deemed to limit or restrict, in any way, the Archdiocese's Spiritual Court Guidelines and other Canonical rules. In addition, notwithstanding anything to the contrary herein, any complaints regarding sexual misconduct shall be handled in accordance with the Archdiocese's applicable sexual misconduct policies.

C. Confidentiality

With the exception of the notifications set forth below, complaints under the Policy will generally be kept confidential unless confidentiality would impede the investigation of the complaint. In addition, confidentiality may not be possible where disclosure or reporting is required pursuant to any applicable law or regulation, ordered by a court, ordered by a Spiritual Court, required by the Holy Tradition and Holy Canons of the Church, or required so that the Archdiocese or any appropriate governmental entity may conduct an adequate or appropriate investigation of the matter.

Following the Initial Inquiry, as defined below, the Archdiocesan Chancellor and Archdiocesan General Counsel shall provide, to the extent feasible and appropriate, immediate notice of allegations of complaints with Reasonable Basis, as defined below, as follows:

For Complaints involving:	Notice to:
Archdiocese	Archbishop and Vice President of the Archdiocesan Council
DAD	Archbishop and Vice President of the DAD Council
Metropolises / parishes / monasteries	Applicable Metropolitan and Vice President of the Metropolis Council and highest-ranking clergy and lay person at each location
Archdiocese Affiliates	Archbishop and chairperson of the Board of Directors

III. INVESTIGATION

1. All complaints shall be subject to an initial inquiry (the “Initial Inquiry”) by the Archdiocesan Chancellor and Archdiocesan General Counsel to determine whether a reasonable basis exists for conducting additional investigation (“Reasonable Basis”). No Reasonable Basis shall exist when the Initial Inquiry determines that the complaint is manifestly false, baseless, or frivolous.
2. Following the determination of a Reasonable Basis, complaints will be investigated by the General Counsel or an investigator retained by the Archdiocese to conduct an investigation (the “Investigation”).
3. The Investigation should be completed in a timely and expeditious manner, unless doing so would be deemed by the Chancellor or the Archdiocesan General Counsel to interfere with any parallel criminal or regulatory proceedings.
4. It is the obligation of all Clergy and lay persons who have or may have information regarding the complaint to cooperate fully and completely with the Investigation.
5. The investigators shall report the results of the Investigation as they are reached to the Archdiocesan Chancellor and Archdiocesan General Counsel
6. Upon receipt of the results of the Independent Investigation, the Archdiocesan Chancellor and Archdiocesan General Counsel shall provide a Final Report to the Archdiocesan Executive Committee that consists of the following:

- a. The Complainant’s formal complaint and any amendments thereto;
- b. A summary of the findings from the Investigation;
- c. A statement of any conclusions reached by the Archdiocesan Chancellor and the Archdiocesan General Counsel; and
- d. Disclosure of disciplinary action as determined by the Archdiocesan Chancellor and the Archdiocesan General Counsel. In the event that the Archdiocesan General Counsel and the Archdiocesan Chancellor either decline to impose disciplinary action or are unable to agree regarding disciplinary action for the Respondent, then the Archdiocesan Executive Committee shall meet to determine the appropriate disciplinary action, if any. In addition, at any point in the process, the Archdiocesan Executive Committee reserves the right to report the Complaint to the relevant authorities.

A Final Report shall also be provided as follows:

<u>For Complaints involving:</u>	<u>Notice to:</u>
Archdiocese	Archbishop and Vice President of the Archdiocesan Council
DAD	Archbishop and Vice President of the DAD Council
Metropolises / parishes / monasteries	Applicable Metropolitan and Vice President of the Metropolis Council and highest-ranking clergy and lay person at each location
Archdiocese Affiliates	Archbishop and chairperson of the Board of Directors

7. This policy is not intended to replace or change any legal reporting obligations. Therefore, conduct required by law to be reported by the Complainant to local, county, state, federal or other law enforcement, social services, or other outside agencies shall be reported, as applicable. Legally required reporting does not obviate the other required reporting in this section; nor does reporting to the Archdiocese satisfy a person’s mandated reporting obligation required by law.

IV. NO RETALIATION

No individual who in good faith reports any Violation shall suffer intimidation, harassment, discrimination or retaliation, and with respect to any employee, any retaliation that results in an adverse employment consequence. Any individual entitled to this protection who believes he or she has been the subject of intimidation, harassment, discrimination or retaliation for submitting a whistleblower complaint should immediately report the same as a Violation of this Policy.

V. PUBLICATION AND DISTRIBUTION

This Policy shall be distributed to the Faithful, as well as to all officers, directors, employees, and volunteers of the Archdiocese, through the inclusion of this Policy as an Addendum to the Regulations of the Greek Orthodox Archdiocese of America, and distributed electronically to clergy and laity, by posting on the Archdiocesan website. Information regarding the Reporting Mechanism referred to in this Policy shall be included, periodically, in the Orthodox Observer.

VI. LIMITATIONS TO SCOPE OF POLICY

This Policy describes the general approach that the Archdiocese should follow with respect to reports of whistleblower complaints. However, as a religious organization, it may not be possible or appropriate for the Archdiocese to follow this approach in every case. Accordingly, each and every provision of the above Policy, including the provisions regarding confidentiality and protection from retaliation, are expressly subordinate to our Faith, Holy Tradition, and Holy Canons of the Church. Further, the Archdiocese reserves all protections accorded to it by the United States Constitution as well as by applicable federal and state law. Nothing in this Policy shall work in derogation of, or be construed as an abdication by the Archdiocese of the Church's constitutionally protected freedom from governmental interference, and this Policy is not intended to diminish these freedoms in any respect or to create any legal rights or responsibilities upon the Archdiocese or any of its representatives.