

SAINT MARK'S CATHEDRAL

WHISTLEBLOWER POLICY

Codes of Ethical Conduct

The Cathedral requires vestry, officers and employees, as employees and representatives of the Cathedral, to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, to practice honesty and integrity in fulfilling their responsibilities, and to comply with all applicable laws, regulations, and Cathedral policies (such requirements are referred to in this policy as the "Codes"). It is anticipated that the Cathedral will be adopting a Staff Ethics Code and a Vestry Code of Ethics and, upon adoption, these will become part of the Codes.

Reporting Responsibility

It is the responsibility of all vestry members, officers and employees to comply with the Codes and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No vestry member, officer or employee who in good faith reports a violation of the Codes shall suffer harassment, retaliation or adverse employment consequence. In contrast, a vestry member, officer or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including possible removal as a vestry member and/or termination as an officer or employee. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Cathedral prior to seeking resolution outside the Cathedral.

Reporting Violations

In most cases where there is a question, concern, suggestion, or complaint, a vestry member should approach the Senior Warden and an officer or employee should approach his or her direct supervisor because they are in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or, in the case of a vestry member, with the Senior Warden, or you are not satisfied with the response of your supervisor or the Senior Warden, you are encouraged to speak with the Canon Missioner or Director of

Abundance or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Codes to the Cathedral's Canon Missioner, who has specific and exclusive responsibility to investigate all reported violations. The Canon Missioner is required to report suspected violation of the Codes to the Vestry's Senior Warden and Chancellor. An annual report will be provided to the Vestry.

Canon Missioner

The Canon Missioner is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Codes. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The Canon Missioner will advise the Senior Warden and Chancellor of any alleged violation and keep them informed regarding investigation and resolution of the matter. If the Canon Missioner is named in a complaint or allegation, the Senior Warden is responsible for investigating and resolving the alleged violation.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation should be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.