

ADDENDUM C

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, including the New York Nonprofit Revitalization Act of 2013. 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, Archdiocesan Council members, or volunteers of the Archdiocese (collectively, “Violations”). The Faithful and other affected individuals are encouraged to report potential Violations pursuant to the procedures set forth below.

This Policy applies only to the Greek Orthodox Archdiocese of America, a New York religious corporation. Metropolises and parishes are encouraged to implement their own policies/and or practices, consistent with applicable state law and high ethical standards.

II. PROCEDURES

A. Administration of Policy

The director of the Archdiocesan Office of Internal Assessment and Evaluation (the “Director”), in consultation with the Chancellor of the Archdiocese (the “Chancellor”), the General Counsel of the Archdiocese (or in the absence of a General Counsel, the Legal Committee of the Archdiocese) (“Legal Counsel”) and the Executive Director of Administration of the Archdiocese (the “Executive Director”) is 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

Whenever possible, the Archdiocese encourages the sharing of questions, concerns, suggestions and complaints first with any supervisor or other appropriate individual, in order to see whether or not the matter can be resolved informally to the satisfaction of the complainant. If that is not possible or feasible, and recognizing that such informal reporting is not required pursuant to this Policy, formal complaints may be submitted to the Director (and/or to the Chancellor, Legal Counsel or Executive Director) in writing.

Complaints may also be submitted anonymously through a mechanism 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, or its policies regarding workplace harassment. 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

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.

III. 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.

IV. 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.

V. 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.