

## Whistle Blower Policy

**Q:** Does the Ethics Policy require me to report on others?

**A:** Yes. If an Employee suspects an Ethics Policy violation by another Employee or an elected person, the Employee has a duty to report the suspected violation. It is always best to report. You must disclose (blow the whistle) on yourself, your friends and your colleagues.

**Q:** Can I report suspected violations anonymously?

**A:** Yes. You may make an anonymous report by calling 1.888.236.6877 or online at [www.ethicspoint.com](http://www.ethicspoint.com). You must provide sufficient corroborating evidence to justify an investigation. You may also make an anonymous report by filling out Attachment 3 and mailing it, unsigned, to the General Counsel, Martha Clark.

**Q:** Are investigations confidential?

**A:** Yes. Only those with a need to know will be included in the investigative process.

**Q:** What is the penalty for an Employee violating the Ethics Policy?

**A:** Violations or noncompliance with the Ethics Policy may result in discipline, including termination of employment under the employee handbook.

## Annual Reports

**Q:** Do I continue to submit an annual report?

**A:** Yes. The Ethics Policy requires Employees to submit annually a one-page report to Martha Clark, General Counsel. The report form may be found with the Ethics Policy and is labeled "Attachment 1".

### Reminder:

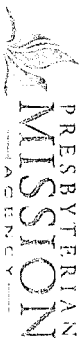
The Ethics Policy and related forms can be found on CenterNet under "Human Resources Policies & Forms".

*If you have questions about your Ethics Policy obligations contact*

*Martha Clark, General Counsel*

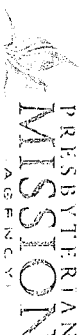
*(502) 569-5390*

*[Martha.Clark@pcusa.org](mailto:Martha.Clark@pcusa.org)*



## ETHICS POLICY

Easy Reference Guide  
For Presbyterian Mission Agency  
("PMA") and Office of the  
General Assembly ("OGA")  
Staff ("Employee")



*This Easy Reference Guide is not meant to replace the Ethics Policy which may be found on:*

CenterNet under "Human Resources Policies & Forms"

OR

Office of Legal Services  
502-569-5390

## Two Components of the Policy

- **Conflicts of Interest Policy**
- **Whistle Blower Policy**

## Basic Requirement

- **Duty of Loyalty & Care**

**Q:** What is required of me?

**A:** Employees have a **duty of loyalty and care** to the PMA or OGA. Employees must act in the best interest of the organization rather than their own interest or the interest of another entity or person.

## Conflicts of Interest

Employees must avoid conflicts of interest or situations where an Employee may be influenced or appear to be influenced in decision-making or business dealings by any desire for personal advantage other than the success or well-being of the PMA or OGA. Some examples are:

- Employee has financial interest or other role with vendors or organizations doing business with PMA/OGA.

- Business dealings with an Employee's friends or family are particularly sensitive and require careful evaluation. Family is broadly defined.

If an Employee thinks he/she may have a conflict of interest, disclose it in advance of the decision being made if it is known or as soon as the conflict is apparent if it is not known via Attachment 2 to the Ethics Policy.

## Gifts

**Q:** May gifts be accepted?

**A:** Generally, **NO**. In addition, monetary gifts, including gift cards, may **never** be accepted.

## **Exceptions:**

- Gifts, meals, outings and relationship-building activities provided by PCUSA churches, middle governing bodies, partner churches, and related organizations.
- Gifts that primarily benefit PMA/OGA and not the individual.
- Occasional small gifts of less than \$50 in value.

- Meals, outings, relationship-building activities in connection with PMA/COGA business. (If valued over \$100, the Employee shall promptly report in writing to the General Counsel.

## Confidentiality

**Q:** Does the Ethics Policy require confidentiality?

**A:** Yes. Employees must not disclose information that is not known outside of the PMA/OGA or not known by public means.

## Compliance with Law & Policy

Employees are responsible for complying with laws, regulations, and PMA/OGA and PCUSA policies & procedures.

**Q:** Must I prepare timely records and retain them?

**A:** Yes. Employees must prepare, process, maintain, and report complete, accurate, and timely records. Employees must comply with the Records Retention Schedule of the Department of History. Any document relevant to actual or anticipated internal investigations, legal proceedings, or governmental investigations must be preserved.