

Equestrian Order of the Holy Sepulcher of Jerusalem

The Order in North America – Personal Conduct

As members of the Equestrian Order of the Holy Sepulcher of Jerusalem (hereinafter referred to as the Order), the Vice Governor General for North America, the North American Lieutenants and other persons holding a leadership position in North America (NA) are committed to honest and ethical conduct and being good stewards of the funds entrusted to us by both our members and others desiring to assist us in our work in the Holy Land.

To ensure this commitment, this document has been created to guide NA leadership in the performance of their duties with the Order. It is based on materials created by the United States Conference of Catholic Bishops and previously created documents of the Order.

While it does not attempt to summarize or address all ethical questions or specific situations that might arise, it is designed to provide general guidance on one's ethical obligations in a leadership position within the Order.

North American Leadership Position Definition

A person holding one of the following positions is considered to have a North American Leadership Position (hereinafter referred to as the NA leadership position)

Vice Governor General for North America, Lieutenant, Chancellor, Secretary, Treasurer, Section Presidents or Area Councilors, Special Councilors, all members of a Lieutenancy Council and any person appointed to a Commission, Committee or Task Force of the Order.

Any member, staff person or volunteer with responsibility for receiving or disbursing funds from any entity of the Order shall also be included in this commitment.

Purpose

This commitment requires that all persons holding a NA leadership position act in a manner that will promote:

Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;

Disclosure of any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest;

Full, fair, accurate, timely and understandable disclosure in public communications;

Prompt internal reporting of violations of these guidelines.

General Conduct

The Order requires persons, especially in leadership positions, to observe high standards of business, personal, moral and ethical conduct when performing their duties and responsibilities. All members must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Political Involvement

While a member of the Order may continue his or her personal political activities and associations, he or she must do so strictly on a personal basis and may not associate the Order with any such political activity in any way, so as to not to jeopardize the Order's "not for profit" status.

Conflicts of Interest

All persons in a NA leadership position are expected to perform their duties conscientiously, honestly, and in accordance with the best interests of the Order. They must not use their position, or the knowledge gained as a result of their position, for any private or personal advantage.

Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence and nature of conflict, any personal financial interest and any other material facts as outlined in the Reporting Responsibility section that follows.

Personal Inurement

All persons in a leadership position should not seek, or accept for their own benefit, or for the benefit of immediate family members, any favors, preferential treatment, special benefits, special documents, gifts or other consideration that could influence, or appear to influence, the Order's business decisions in favor of any person or company. Meals, entertainment, holiday gifts and similar items that are infrequent and of modest value are not considered violations of this provision.

Stewardship of Funds

Funds entrusted to the Order shall be managed to maximize its impact on achieving the Mission of the Order as defined in the Order's Constitution.

When one's position in the Order requires spending funds entrusted to the Order, or incurring any reimbursable personal expenses, that person must use good judgment on the Order's behalf to ensure that the expenditure is necessary and that good value is received. All expenses incurred on behalf of the Order shall be appropriately documented and included in the Lieutenancy's Annual Report to the Grand Magisterium.

Policy to Report Wrongdoing

The objectives of the Policy to Report Wrongdoing 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 Catholic Church, on a confidential and anonymous basis;
- The receipt, retention, and treatment of complaints received by the organization; and
- The protection of anyone reporting concerns from retaliatory actions.

Reporting Responsibility

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

Reports of Concerns shall be submitted based on where the Concerns is observed:

A concern observed within a Lieutenancy shall be submitted to the Lieutenant

A concern observed with a Lieutenant shall be submitted to the Vice Governor General for North America

A concern observed with the Vice Governor General for North America shall be submitted to the Governor General.

Reports of Concerns must be made in writing and should include all relevant information about the suspected act, including any material evidence that exists.

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, a violation of the Code of Conduct, legal or canonical concerns, or other irregular management activity.

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 one who, in good faith, reports a Concern shall be subject to retaliation.

Confidentiality

Reports of Concerns, and investigations pertaining hereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Annual Review

This commitment shall be reviewed annually with all persons holding a NA leadership position with the type (written or verbal) and date of the review noted in the appropriate records.

Written on this day _____ 2023

Adopted this day _____, 2023 by the Vice Governor General for North America and the North America Lieutenants