

FFWPU-USA Whistleblower Policy

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June 22, 2015

Article I Ethics and Conduct Policy

The Holy Spirit Association for the Unification of World Christianity (hereinafter “Church”) requires directors, officers, and employees (hereinafter “Church employees”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The Church employees must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Article II Whistleblower Policy

The Church is committed to complying with statutory requirements that provide appropriate protections for whistleblowers. In line with this commitment this Whistleblower Policy aims to provide reassurance for whistleblowers, including but not limited to employees and members of the Church, that they will be protected from retaliation for whistleblowing. This Whistleblowing Policy is intended to encourage and enable individuals to raise serious concerns within the Church prior to seeking resolution outside the Church.

Article III Whistleblower Protection

1. The Church shall take no retaliatory action, including but not limited to harassment, retaliation, adverse employment consequence, or expulsion from membership in the Church, against a whistleblower who follows the procedures set forth below in disclosing to responsible persons in good faith an activity, policy or practice of any Church employee, which a whistleblower reasonably believes is violating in a serious manner applicable laws and/or Church principles or guidelines as set forth in internal documents of the Church, including but not limited to the Employee Manual, Pastor’s Pledge and Conflict of Interest Policy (hereinafter “illegal or unethical practice”).
2. A Church employee who retaliates against someone who has reported a suspected illegal or unethical practice in good faith is subject to discipline up to and including termination of employment.
3. Nothing in this policy shall waive in any way the attorney client privilege. All attorneys representing the Church or any of its subsidiaries must maintain attorney client confidences at all times, and be guided by the applicable rules of professional responsibility, including New York Rule 1.13, regarding the disclosure of confidential information.

Article IV Procedures for Making a Complaint

1. This Whistleblower Policy suggests that individuals share their questions, concerns, or complaints (hereinafter “complaint” or “complaints”) regarding suspected illegal or unethical practice in a written form and with a person in the Church who can address them properly.
2. The Church employees shall refer their complaints to:
 - a) a supervisor, or
 - b) a director of the Church human resources department.
3. Members and other individuals shall refer their complaints to:
 - a) a local/district pastor, or
 - b) a director of the Church human resources department.
4. The person receiving the complaint in accordance with Sections 2 and 3 of this Article, shall first attempt to resolve the matter to the satisfaction of the complainant. If this cannot be done, the person receiving the complaint shall promptly report the complaint to a specially formed committee within the National Council (hereinafter “Committee”).

Article V Investigation Procedures by the National Council

1. The Committee shall make initial inquiry on the complaint about the suspected illegal or unethical

practice. Within 10 business days from the start of the initial inquiry, the Committee shall send a notice of the complaint to a Church employee against whom allegations have been made. Upon a complainant request, his/her identity will remain anonymous to the Church employee against whom allegations have been made. Within 7 business days upon receipt of the complaint the Church employee can reply to the complaint in a written form or ask for a meeting with the Committee. The complainant has a right to provide his/her written reply to the explanations submitted by the Church employee.

2. Investigation of the complaint shall be prompt and shall generally be completed within 1 month from the date of receipt of the complaint. The 1-month period can be extended if the complaint requires a more extensive investigation. In this case, the investigation period shall not exceed 2 months altogether. Investigation depends on the facts of the case and the kinds of information the Committee needs to gather. The Committee can meet with the Church employer to hold interviews and gather documents, interview witnesses over the phone, ask for documents by mail and do other actions necessary for the purposes of investigation. Church employees shall cooperate with the Committee to the best of their ability.

3. At the conclusion of the investigation, the Committee shall make a conclusion on whether the suspected illegal or unethical practices are verified and/or otherwise substantiated and propose an appropriate action against the Church employee against whom the allegations were verified and/or otherwise substantiated or against the complainant in case the complaint was not made in good faith.

Article VI Decision upon the Complaint

1. The Committee shall submit its conclusions and proposal on appropriate action against the Church employee or the complainant to the Church Board of Directors for a final decision. The Church Board of Directors can:

- a) endorse the conclusions and proposal on appropriate action, or
- b) endorse the conclusions but decide on the different action, or
- c) dismiss the conclusions and proposal on appropriate action and return the complaint for further investigation in case of material mistakes in investigation, or
- d) dismiss the conclusions and take a decision on whether the complaint is verified/substantiated in case of mistakes in application/interpretation of the statutory regulations, Church principles, internal documents of the Church, including but not limited to the Employee Manual and Pastor's Pledge.

2. The complainant and the Church employee against whom the allegations have been made shall be immediately notified of the decision and appropriate action against the Church employee or the complainant, if any.

Article VII Confidentiality

1. Complaints may be submitted on a confidential basis by the employee or may be submitted anonymously. However, this Whistleblower Protection Policy encourages complainants to put their names to complaints because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.

2. Reports of the suspected illegal or unethical practices will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Article VIII Acting in Good Faith

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates an illegal or unethical practice. Any allegation that proves to have been made maliciously or knowingly to be false may result in disciplinary or other action. The decision on the disciplinary or other action shall be made by the Board of Directors upon the proposal of the Committee, in accordance with Article 6 of this Whistleblower Protection Policy.