202 Investigations Procedures

202 INVESTIGATION PROCEDURES

202.1 Investigation Conducted Regardless of Wrongdoer's Position:

Allegations of fraud, dishonest conduct, or other ethics violations will be investigated regardless of the suspected wrongdoer's length of service, position or title.

202.2 Investigation Conducted by Internal Audit:

The Manager of Internal Audit (the "Manager") has the primary responsibility for the investigation of all suspected ethics violations. No Archdiocesan entity should conduct its own independent investigation.

202.3 Coordination with Human Resources:

The Manager will coordinate all investigations with Human Resources and other parties as necessary, including Archdiocesan Legal Counsel, and will determine the appropriate members of the investigative team. Investigations of complaints related to violations of Human Resources policies will ordinarily be led by Human Resources.

202.4 Access Provided to Investigative Team:

Individuals involved in the investigation will have free and unrestricted access to all Archdiocesan records and premises and the authority to examine, copy and / or remove all or any portion of the contents of files, desks, cabinets and computer records that are necessary to the investigation.

202.5 Issuance of Audit Report:

If the investigation substantiates that fraudulent activities or other ethics violations have occurred, the Manager of Internal Audit or investigative team will issue an audit report to appropriate personnel and the Audit Committee of the Board of Financial Administration. In addition, the Manager of Internal Audit or investigative team will report the results of the investigation to the complaining party as appropriate.

202.6 Review of Recommendation to Terminate Wrongdoer's Employment:

If the investigation results in a recommendation to terminate the employment of an Archdiocesan employee, the recommendation shall be reviewed for approval by the employee's supervisors and designated representatives from Human Resources and, where appropriate, by Archdiocesan Legal Counsel, before any such action is taken. If the investigative team believes that the corrective action taken by the employee's supervisors and Human resources was insufficient based on the facts uncovered during the investigation, the investigative team will address its concerns to the Vicariate office and Human Resources.

202.7 Report to Law Enforcement Authorities:

It is the practice of the Archdiocese to report all substantiated fraud and other criminal law violations to appropriate law enforcement authorities.