



KEEPING *the* PROMISE

CODE *of*  
ETHICS  
*and* CONDUCT

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KNIGHTS OF COLUMBUS

# KEEPING *the* PROMISE

To You AND Our Order

CHARITY UNITY

FRATERNITY PATRIOTISM



# MESSAGE FROM SUPREME KNIGHT PATRICK E. KELLY

Blessed Michael McGivney was a man of holiness, courage and vision. He saw the needs of Catholic men and their families in his parish and set out to help them by forming the Knights of Columbus. Never could he have imagined that the Knights of Columbus would grow into an international organization of more than 2 million members and one of America's most successful fraternal benefit societies.



*Patrick E. Kelly*

Patrick E. Kelly, Supreme Knight

As Knights of Columbus employees, we share a special responsibility to advance the Order's mission and to protect the legacy we have been given. With that responsibility comes the obligation for all employees to conduct themselves according to a set of principles designed to deliver fairness and accountability: our *Code of Ethics and Conduct* ("The Code").

I ask you to review and become familiar with *The Code*. It applies equally to all of us, regardless of title or position. The way we conduct ourselves contributes not only to the Order's reputation but also to maintaining a culture in which we can expect to be treated fairly, ethically and respectfully.

If you encounter issues relating to ethical conduct, moral integrity or fair treatment, *The Code* can help you reach a solution. When issues arise, you should also reach out to your manager, supervisor or the Compliance Department. All employees should feel confident that they can report questionable or unethical activity without fear of discrimination or retaliation.

The goal of *The Code* is simple: Regardless of the situation, we should always strive to do the right thing. At the Knights of Columbus, our tradition of integrity is a strong one, starting with Blessed Michael McGivney himself. But its continued strength is dependent on each of us, now and into the future.

# KNIGHTS OF COLUMBUS

## FOUNDING PRINCIPLES AND CORE VALUES

Blessed Michael McGivney founded the Knights of Columbus on the principles of Charity, Unity, Fraternity, and Patriotism. Today, these principles serve as the foundation of our Core Values:

**Integrity:** Firm adherence to ethics, honesty, and a moral code.

**Professionalism:** Promoting the highest standards in all we do.

**Excellence:** Leading by example and constantly striving to be the best.

**Respect:** Treating each other with the highest regard.

This Code of Ethics and Conduct demonstrates how our Core Values guide us in situations that we may encounter.



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# Knowing the Role of Our Code

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Our Code of Ethics and Conduct (Code) reflects our Core Values and explains how they guide all Knights of Columbus (Order) activities and business operations.

Situations involving ethics can be complicated, and sometimes it is difficult to know what to do. Our Code is a resource to help us make sound decisions, even in complex situations. It provides guidance on when and how to speak up if we have questions or concerns. Consulting the Code should always be the first step in deciding how to handle an ethical dilemma or difficult decision. See “Finding Help and Reporting Matters of Concern” (page 4) for more details.

If you have any questions regarding any part of this Code, please contact your manager, Human Resources, or the Chief Compliance Officer.

This document will be reviewed and updated every three years.

**Q** What if I am facing a situation that is not covered in the Code?

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**A** Our Code of Ethics and Conduct cannot address all of the issues that may arise at work. If you are ever unsure of the right course of action, check our policies. If the answer is still unclear, it is always appropriate, in any situation, to ask for help. Start with your manager or any of the resources identified in the Code.

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*An ethical workplace is not just an idea that we promote to the world; it is at the core of what we stand for as an organization. Make sure your actions always reflect our Core Values.*

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Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

# KEEPING THE PROMISE



# MEANS...

## Following Our Code and the Law

The Code and all related Order policies (policies) apply to all personnel of the Order.

Examples of personnel may include, but are not limited to, the following:

- Members of the Board of Directors (directors)
- Supreme Officers (officers)
- Employees
- Interns and Students
- Agents
- Contractors of the Order, its subsidiaries, and affiliates

Additionally, our business partners, consultants, vendors, and suppliers must be familiar with our Code and conduct themselves according to similar principles.

## Following Corporate and Business Unit Policies

Corporate policies deal with specific topics related to ethical conduct in the workplace that you should know and follow. These policies are located on the Order's intranet site in the Corporate Policy Center. Along with knowing this Code, be mindful of the laws, rules, and regulations that govern our work for the Order. Personnel should note that individual business units (departments) might issue policies and procedures relating to appropriate business conduct. We must follow these rules in addition to our Code's guidelines.

We are all equally accountable for breaches of this Code or other policies. All of us must strive to do the right thing in all of the Order's activities and business dealings.

## Respecting Our Duties Our role: How we all comply with our Code

All personnel, no matter what their role, are expected to:

- Uphold our Core Values by always acting with *Integrity*. Always be honest and ethical in everything you do on behalf of the Order.
- Maintain the highest standards of *Professionalism*.
- Consistently strive for *Excellence* in our shared mission. Complete all required ethics and compliance training in a timely manner and apply it to your job every day.
- Treat others with the utmost *Respect*.
- Report concerns about possible violations of laws, regulations, our Code and corporate policies.
- Cooperate fully and tell the whole truth when responding to an investigation or audit.
- Be accountable for your actions. Violating our Code is grounds for corrective action, up to and including termination.

## Responsibilities for Management

Managers, supervisors, officers, and directors ("Managers") are expected to perform their jobs with professionalism and integrity.

Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

If a manager becomes aware of suspected or actual misconduct, including violations of the Code, he or she must report those concerns to the Chief Compliance Officer or to Human Resources. Managers must make certain every issue, concern, or question identified gets reported and resolved.

Managers must ensure that there is never any retaliation against an employee for fulfilling his or her responsibility under the Code by reporting in good faith.

Managers are further required to:

- Understand, uphold, and communicate the concepts and values contained in this Code and related policies
- Be a role model. Lead with integrity and promote a culture of ethics and respect.
- Make sure all business records are accurate and well-maintained
- Foster a safe, healthy working environment where all employees receive fair and respectful treatment
- Support your team and help them understand what is expected of them.
- Keep an open-door setting that encourages questions, feedback, and reporting
- Understand your obligation to report behavior that violates the Code, our policies or the law
- Utilize the resources listed in the “Finding Help and Reporting Matters of Concern” section
- Never put business results ahead of ethical conduct or compliance with the Code or the law.

Ultimately, managers are responsible for ensuring that personnel understand and comply with our Code, our policies, and any applicable laws or regulations. Additional reference material for responding to challenging ethical situations is available to managers in *The Manager’s Playbook*, which is available on iLink.

If approached with a question or concern related to the Code, managers should listen carefully and give their complete attention. Ask for clarification and additional information. Managers should answer any questions they are able to, but are not obligated to give an immediate response.

# KEEPING THE PROMISE



# TO THE ORDER

## Finding Help and Reporting Matters of Concern

### Explanation of Reporting

If you are unsure whether a particular situation violates our Code or the law, it is vital to ask questions. Issues that are not a direct violation may still affect our reputation and must be reported immediately. The earlier we investigate and correct potential violations, the better our chances of preventing an issue from escalating.

Some examples of issues that you must always report include, but are not limited to:

- Any action that might lead to incorrect financial reporting
- Any unlawful or illegal act
- A violation of the Code or the Order's policies
- Any other action that contradicts our Core Values

## Zero Tolerance for Retaliation

If any personnel from any level of the Order reports misconduct in good faith, the Order will protect that person from retaliation. Making a report in good faith means to have an honest belief that the information is as accurate as possible and that there is a legitimate reason for concern.

The Order prohibits discrimination, harassment, and bullying in any form. We take all claims of retaliation seriously, investigating each one thoroughly and taking appropriate action. If you feel you have experienced this from anyone at the Order, or by a partner or vendor of the Order, immediately report the incident to your manager, Human Resources, or the Chief Compliance Officer.

## Contacts for Reporting

You may always contact the Chief Compliance Officer, call the Ethics Helpline, or visit <https://reportlineweb.com/kofc> to make a report. You may remain anonymous when using the Helpline or website.

## Making the Right Choice

If you're faced with an ethical dilemma and you're not sure what to do, ask yourself:

- Is it legal?
- Does it comply with our policies?
- Is it consistent with our core values?
- Is it consistent with our long-term goals and interests?
- Would I be comfortable with my decision if it was made public?

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*Maintain our high standards of professional conduct at all times, including when working with clients and business partners, during business hours and after hours, and in all business settings, inside and outside the office.*

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If your answer to any of these questions is **NO**, don't do it, and seek further guidance.



Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

## All Reports Will Be Investigated

An objective, independent, and knowledgeable team will be assigned to conduct or supervise the investigation. They will determine the facts through interviews, a review of documents, and other appropriate means.

## Complete Reports and Follow-Up Information

All reports or questions regarding our Code, policies of the Order, or the law should be as detailed as possible. Important information to provide includes:

- Names of those involved (including other witnesses)
- Times and locations of any incidents
- Any documentation regarding the incident or allegation
- Your contact information unless you are making an anonymous report

## Responding to Code Violations in a Fair and Consistent Manner

If an investigation reveals there has been a violation, the Order will take appropriate disciplinary action. Personnel who violate the Code, applicable laws, regulations, policies, or contracts are subject to disciplinary actions up to and including termination of employment or service, regardless of the level of their position at the company. The Order is committed to providing a safe and supportive work environment where everyone is treated with respect, fairness, and dignity. This is an integral component of a positive, healthy, and successful working environment.

## Avoiding Conflicts of Interest

A conflict of interest arises when your interests conflict with the business interests of the Order. Examples include:

- Owning a financial interest in another organization that sells insurance products
- Having a personal or family interest in a transaction with the Order
- Accepting unreasonable gifts from a vendor or supplier

Annually, all employees are required to sign a Conflict of Interest Disclosure Form. If a conflict arises, you must disclose it promptly and seek to resolve it immediately.

**Q** The Order just started using a new third-party vendor and it is a company in which I own stock. Is that a conflict of interest?

&

**A** Possibly. The best course of action would be to disclose this information to your manager and to the Chief Compliance Officer so that the situation can be reviewed.

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*Most concerns about conflicts of interest can be resolved and appropriately addressed through prompt and complete disclosure to the Chief Compliance Officer.*

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## Working With Family and Friends

While our policy does not prohibit the employment of relatives, in order to avoid conflicts of interest or favoritism, employees may not work directly for, supervise, or make employment decisions about a family member without first advising Human Resources of the relationship. For further information, please see the Employment of Relatives Policy found in your *Employee Handbook*. You will find *Employee Handbooks* for management and bargaining unit employees in PeopleFirst.

You must disclose any relationship with a family or friend (or their company) to your manager, to Procurement, or to Human Resources before we hire or contract with them for goods or services.

Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

## Financial Interest in Other Businesses

Personnel must not make or hold investments in a company that would create a conflict of interest with their duty of loyalty to the Order. Holding a significant business interest in a company which is a competitor or a business partner of the Order could put your personal financial interests at odds with the Order's best interests, which is impermissible. If you think you might own a significant investment in a competitor or business partner which could create such a conflict of interest, you must disclose this to the Chief Compliance Officer who will provide further guidance and possibly require divestiture of some or all of the investment.

**Q** Simone's brother-in-law Joshua is interviewing for a job in her department. Are they allowed to work together?

&

**A** Probably. Simone must inform Human Resources that a close relative is a candidate for hire. As long as Simone and Joshua will not supervise or evaluate one another, a conflict of interest probably does not exist.

## Outside Employment

Employment with other companies is allowed as long as it does not impact your work with the Order. Company time and company assets may not be used for any outside employment. Personnel may not imply in any way that other employers are endorsed by the Order.

## Corporate Opportunities

We must not take advantage of any knowledge or information gained in working at the Order to enrich ourselves, our families, or others financially. This includes taking any business or investment opportunities discovered through our position at the Order.

## Gifts and Entertainment

Conflicts of interest can easily develop around the giving or receiving of gifts or entertainment in the course of our business relationships on behalf of the Order.

If gifts, meals, and entertainment meet the following criteria, they may be acceptable:

- Infrequent
- Very small in value
- Unsolicited
- Not made in cash or cash equivalents (such as gift cards)
- In compliance with all applicable laws and regulations
- Customarily offered to others having a similar business relationship

As a rule, personnel should not accept any gift, meal, or entertainment valued over \$100, or gift cards or other "cash equivalents" in any amount. Please note that gifts, meals, or entertainment that are valued at \$100 or less may still be considered unacceptable if they create a conflict of interest or the appearance of a conflict of interest. Any attempts by others to provide you with gifts, meals, or entertainment that create a conflict of interest, or gifts of cash or cash equivalents of any value, should be disclosed to the Chief Compliance Officer, who will decide how the matter will be handled. This also applies to any attempts by others to reimburse hotel or other travel or meeting expenses on your behalf.

**Q** During the holidays, one of our vendors sent me (a KofC employee) a \$75 gift card to a local restaurant. May I accept it?

&

**A** No. A gift card of any value is a cash equivalent and it would violate our Code of Ethics and Conduct to accept it. After notifying your manager and the Chief Compliance Officer, you should politely thank the vendor but return the gift card and let them know our company's Code of Ethics does not allow acceptance of gift cards.

Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

## Ensuring Ethical Record Keeping

Each of us plays a role in assuring the integrity of our business records. Such records include:

- Financials and other Statements of Income or Business Results
- Invoices and statements
- Payroll and timekeeping
- Expense reports and accounts
- Agent and member information and data
- Reports to government agencies and any other public reports

All entries, member records, corporate funds, and assets must be recorded accurately and in accordance with the Order's procedures. Never should an entry intentionally conceal the true nature of any transaction or event. It is especially important that Financial Records are clear and that we explain, with words, any numbers that could have more than one meaning.

You should never participate in unethical record-keeping activities, such as:

- Making false statements (whether verbal or written)
- Altering sales information
- Overstating or understating assets, liabilities, or any other figures that could mislead customers, regulators or rating agencies.
- Hiding or incorrectly accounting for Order funds

Financial documents that the Order discloses to the public and other stakeholders must be accurate and honest. This includes marketing materials and publications that report financial information and results. If you find inaccuracies, you must notify the appropriate personnel immediately. Do not alter records without first receiving authorization.

If you know about, or suspect, any violations of our Code or policies involving accounting, internal controls, auditing matters or records, please immediately report your concerns to the Chief Compliance Officer or Internal Audit Department.

**Q** Geoff often receives vendor invoices and sends them for internal review and payment processing. He located one invoice that had been misplaced on his desk for months. Too embarrassed to send it for payment after the due date had passed, he contacted the vendor and asked them to issue a new invoice with a current due date. Is this acceptable?

**A** No. Regardless of why the invoice was not paid on time, asking a vendor to alter an invoice is never the right thing to do. Geoff should have immediately talked to his manager for assistance in handling the matter.

## Record Retention

You must be aware of, and follow, internal procedures and applicable laws when storing, maintaining, and discarding paper and/or electronic business records.

Do not tamper with or manipulate records, or destroy them prior to their expiration dates. The procedure for determining document expiration dates is set in the Records Management Policy and Records Retention Schedule located on the Order's intranet site in the Corporate Policy Center.

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*The Order recognizes that it is good business practice to retain and manage records in a consistent, systematic, and reliable manner, so that they can be retrieved promptly when required for legal, regulatory, or operational reasons.*

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## Communicating With Regulators, Attorneys and Investigators

Occasionally we may be asked to collect or retrieve documents and other data for:

- Internal or external audits
- Internal or external investigations
- Litigation
- Other informal inquiries

Once it is determined that the requestor has the appropriate authority to collect this information, promptly and completely provide all requested data. Never conceal, alter, or destroy requested records. Always respond appropriately, accurately, timely, and respectfully to inquiries. Never attempt to exert improper influence on the results of an investigation or audit. Remember that you must cooperate fully and timely with any internal Compliance or Legal Department investigation.

If you receive a request from a regulator, attorney, or investigator for records, documents, or other information, immediately contact the Legal Department or the Chief Compliance Officer so that they can confirm that the request is valid.

## Responding to Media Inquiries

When communicating with the media, it is important that we speak with one consistent voice. Only those designated to do so by the Communications and Strategic Planning departments can make public statements on the Order's behalf. This is to ensure that responses to outside inquiries preserve the Order's reputation for integrity and professionalism. We will provide an accurate and honest picture of our operations to the public. If you have any questions, or have received a request from the media, please contact Communications and Strategic Planning.

Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

## Protecting the Order's Assets

We have a shared responsibility to protect and properly use the Order's assets. Use of all company assets is for legitimate business purposes only. Theft, carelessness, and waste have a direct impact on the Company's profitability. The Order's Acceptable Use Policy is located on the Order's intranet site in the Corporate Policy Center.

## Physical Property and Facilities

We must protect our facilities, equipment, vehicles, computers, and funds from theft, inappropriate use, and damage. Only use these shared assets for legitimate business purposes, and never use any Order asset to take part in prohibited conduct. If you suspect any form of fraud or theft, you should report it immediately to your manager or the Chief Compliance Officer.

## Confidential and Proprietary Information

Safeguarding confidential and proprietary information, such as material that could be of use to competitors or harmful to the Order if disclosed, is vital to the security of the Order. This includes contract documentation and corporate strategies. When using electronic resources such as laptops, ensure they are physically secure and password protected at all times. The use of passwords on our systems and networks is mandatory. If you believe an electronic resource has been compromised, immediately contact your manager or Information Technology Security.

We should never communicate such information to outside parties unless there is a legal obligation to do so, or the Order has authorized such a communication. Do not disclose such information to unauthorized persons or companies.

We are also responsible for recovering any lost/misplaced confidential information when possible, and for preventing further unauthorized use or disclosure. The safeguarding of private and sensitive material must continue even after employment with the Order has ended.

## Intellectual Property

The Order's valuable intellectual property (IP) includes:

- Copyrights
- Patents
- Trademarks
- Service marks
- Trade secrets
- Design rights
- Logos
- Knowledge of business workings
- Intangible industrial or commercial property

We work diligently to protect the Order's intellectual property. We must safeguard these important business tools. You should report any suspected misuse of the Order's intellectual property to the Legal Department. A copy of our policy is located on the Order's intranet site in the Corporate Policy Center.



When using third-party confidential information and intellectual property such as software, we must protect it as we would protect our own property and carefully follow all applicable license terms. We must never knowingly infringe on the copyrights, trademarks, or patents of others. We may not download unlicensed software onto Company computers or duplicate, publish, or distribute copyrighted materials. We will not download songs, photographs, and/or videos without consent from the rightful owner. In addition, we will not disclose or use the confidential information of former employers.

Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

## Using the Order's Systems Properly

### Appropriate Use

The following electronic assets of the Order are to be used only for conducting its business:

- Desktop and laptop computers
- Cellular phones
- Tablet computers
- Email
- Internet access
- Network resources
- Software resources
- Telephones
- Copying and printing equipment

We trust that you will use our company assets appropriately and protect them from loss, damage, theft, waste, and improper use. These resources are intended to advance the success of the company. Unauthorized use of these assets can result in discipline. An example of inappropriate use includes the communication of a discriminatory or threatening message. We may not use these systems to view or communicate sexually explicit or otherwise inappropriate material, or to conduct work on behalf of another business or organization. Do not use, borrow, or loan company assets without permission.

If you have any questions about the use of electronic assets such as computers, telephones, email and internet access, please consult the Acceptable Use Security Policy located on the Order's intranet site in the Corporate Policy Center.

### Reputation at Risk

While social media, email, and other online tools are integral to our ability to compete and communicate, if misused they can also be detrimental to your personal reputation and the reputation of the Order. Always maintain a respectful and professional demeanor in any forum. Never speak on behalf of the Order unless expressly given authority to do so.

## Internet and Email Use

We must be respectful in our use of the Order's resources, including internet access. Do not spend an excessive amount of time on the internet or use the Order's resources inappropriately. The Order reserves the right to block offensive, illegal, and non-business-related sites, as well as sites deemed dangerous to the security or operation of the Order's computing assets.

Take the same care composing and sending email, instant messages, and text messages as you would in composing any other Order document. Electronic messages, both personal and business-related, are lasting and recoverable written records that can easily be copied and forwarded worldwide without your knowledge or consent.

The Order may inspect or monitor all business resources, assets, and property without the prior approval, knowledge, or consent of employees to the extent allowed by law. This includes monitoring and retrieving information that is stored or transmitted on electronic devices, computers, and systems.



Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

## Participating in Social Media

We must always use social media in a way that is respectful and professional. The Order reserves the right to monitor, restrict, and access the use of social media in the workplace.

Should you encounter any negative messages or requests for official Order participation in any social media, refer these issues directly to the Communications and Strategic Planning departments. Under no circumstances should you use social media to engage in harassment of any kind or to distribute confidential or proprietary Order information. Never allow the use of social media to conflict with responsibilities of the Order or the ability to complete regular work duties. By enforcing this policy, the Order does not intend to restrict lawful communications and the sharing of information among our employees. Agents should also refer to the *Social Media Guidebook for the Knights of Columbus Field Force*, which contains specific policies for the use of social media related to the Order's insurance business.

**Q** Marcia enjoys updating her social media accounts during the day and has recently begun livestreaming videos to Facebook from the office. Jan sits in the cubicle next to Marcia and is concerned about her privacy so she asked Marcia to limit her recording to times when Jan is not at her desk. Is the problem solved?

**&**

**A** No. It is not acceptable to livestream from the office. There is a potential for confidential information to be disclosed and it can be an invasion of privacy to those around you. Jan should notify the Chief Compliance Officer.



Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

# KEEPING THE PROMISE



## TO EACH OTHER AND OUR PARTNERS

### Preventing Insider Trading

While the Order is not a publicly traded company, it does have a registered investment advisor subsidiary and many of our business partners are public companies. We may not buy or sell the stock of our vendors, business partners, or investment advisory customers based on any information we learn during our business relationships. Trading stock using this information is considered insider trading and is illegal. We must not give advice to others

based on inside information. This is considered tipping and is illegal. We must protect this information just as we protect any confidential and proprietary third party information.

It is important for us all to act professionally and be cautious when discussing the Order's business outside of the workplace. The security laws that relate to these matters are complex, so please contact the Legal Department or the Chief Compliance Officer if you have questions.

Q

Craig is a manager in the mailroom. One of his employees informed him that a package received from a General Agent was open and its contents were missing. The employee was concerned that the package may have contained nonpublic personal information on an insurance member. How should Craig handle this situation?

&

A

Craig must immediately contact the Chief Compliance Officer. All employees of the Order must take seriously our commitment to protect the private information of our members. The Order must fully investigate any potential loss of member or employee private information and may be required to disclose to regulators the occurrence of such loss.



### Safeguarding Information

We are committed to the privacy of both member and employee information, and we protect private information by following our guidelines for its collection, storage and use. Examples of private information include:

- Medical history
- KofC Member list - which identify members as Catholic - and are therefore protected-- even if they only provide name and address.

Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

- Employment history
- Marital status
- Government-issued identification numbers
- Exam and test results
- Financial information (such as bank accounts and payment cards)

Whenever job responsibilities include the use of member or employee data, we have a duty to know and comply with the privacy and data protection laws that apply to our work. For more information on our data protection guidelines, please see the Acceptable Use Security Policy, found on the Legal page of iLink. If you have any questions, please contact the Director of Information Technology Security.

## Maintaining Safe Workplaces

### Health and Safety Concerns

We are committed to providing a safe and healthy workplace. To achieve this, we must comply with all applicable health and safety rules and regulations, as well as all posted safety procedures within our areas of operation. If you are aware of any unsafe working conditions or have concerns about your safety, immediately inform your manager, a member of the Health and Safety Committee, the Director of Facilities, or Security.

### Substance Abuse

The Order has a zero-tolerance policy with regard to substance abuse and is committed to keeping the workplace free from drugs and alcohol. You may not come to work while under the influence of alcohol, illegal drugs, or misused medications. The only exception to this policy would be for an authorized Order event where alcohol is served after business hours.

### Violence and Disruptive Behavior

Never engage in or tolerate any form of violence including threats, intimidation, or acts of aggression. If you know of actual or potential workplace violence, you should immediately report your concerns to your manager, or Security.

We do not condone unprofessional, disruptive behavior that creates a difficult work environment. All personnel have a duty to report any instances of disruptive behavior to their manager, Security or Human Resources.

For additional information on these topics, please see the appropriate Employee Handbook in PeopleFirst.

**Q** Jim’s manager emailed a joke to various members of his department. The joke was inappropriate and offensive to some of the employees who read the email. When asked, Jim’s supervisor said he did not mean to offend anyone and it was “all in good fun.” Should Jim report the matter?

**A** Yes. Regardless of whether the supervisor’s email constituted illegal harassment or unlawful discrimination, it could be viewed as offensive and will not be tolerated. The Order also protects Jim from retaliation for reporting his concerns.

## Preventing Harassment and Discrimination

The Order is committed to providing a work environment in which all individuals are treated with respect and are free from harassment.

Harassment can be sexual or non-sexual in nature. Sexual harassment includes conduct such as unwanted advances, sexual jokes, and sexually suggestive comments. It also includes touching, requests for sexual favors, and inappropriate comments about another’s appearance. Non-sexual harassment may include offensive comments, jokes, or pictures.

The Order provides equal employment opportunities and fair treatment to all individuals.

Question or Concern? You may contact the Chief Compliance Officer at extension 4122, call the Ethics Helpline at 855-806-7346, or visit <https://reportlineweb.com/kofc> to make a report.

We must provide an inclusive work environment that reflects the diversity of the communities in which we operate. We will demonstrate respect for all of our co-workers, members, customers, and business partners. We do not make employment-related decisions or discriminate against anyone based on any characteristic, as prohibited by applicable law. We believe that everyone should be treated with fairness, respect, and dignity. We expect our business partners to act in a way that is consistent with our sense of fair treatment and equal opportunity.

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*We can find strength in diversity. Different people have different perspectives on issues, and that can be valuable for solving problems or generating new ideas.*

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## Practicing Corporate Ethics

As part of our commitment to corporate ethics:

- we uphold individual human rights and provide reasonable working hours and fair wages and expect the same of our suppliers, vendors, and other business partners.
- we follow the laws regarding wages and work conditions, and ensure that our fellow employees are treated with respect.
- we have a zero-tolerance policy for business partners who do not share the same values, especially if they condone the use of forced labor or human trafficking practices.

The Order will not knowingly do business with partners who violate these policies.

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*We seek business partnerships that align with our core values and follow the highest standards of business conduct. We perform due diligence and know our business partners, consultants, agents and others with whom we conduct our business.*

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# KEEPING THE PROMISE



## TO OUR MEMBERS AND COMMUNITIES

### Respecting the Environment

The Order is fully committed to acting as an environmental steward in all of its locations of operation. To reduce our environmental footprint, we constantly strive to maximize the efficient use of natural resources during our workday. We encourage you to submit any suggestions regarding this goal to Human Resources or the Director of Facilities.

### Understanding Anti-Corruption

We must know and follow the anti-corruption laws that apply to our work. Employees working with third parties in other nations, or working overseas in any capacity, for any length of time, must be particularly careful. It is necessary to be familiar with restrictions on bribery of foreign government officials and commercial partners. Generally, any attempt to influence government employees (or members of political parties or royalty) at any level, by providing gifts or entertainment in return for a business advantage, could be a bribe.

We are never permitted to offer or accept a “kickback.” This means we may not accept anything of value from a business partner or member for whom we have provided revenue, products or services, and we may not provide anything of value to someone who has provided a product or service to the Order.

### Relationships With Public Officials

We must be cautious and transparent in our relationships with public and government officials. Never create the impression that we seek to influence the decision making of any government employee.

**Q** One of our vendors asked me if there might be a position in the Order for his daughter. He said he would be very appreciative of anything I could do to help and patted his wallet. What should I do?

**&** Any suggestion by a business partner that something of value would be provided in return for a favor is not permitted and should be reported to the Chief

**A** Compliance Officer. We do not partner with businesses who employ such practices or who make inappropriate suggestions that imply a kickback will be paid for a business or personal favor.

### Facilitating Payments

In certain parts of the world, government officials commonly receive so called “facilitating” or “expediting” payments to advance or secure the performance of routine governmental actions such as issuing permits or providing police or fire protection. Order personnel must never participate in this practice even if it appears customary.

### Preventing Fraud

We must remain vigilant in preventing, detecting, and deterring identity theft and fraud. The Order maintains an Anti-Fraud Plan, which is located on the Order’s intranet site in the Corporate Policy Center.

The purpose of the Anti-Fraud Plan is to ensure that the Order has in place reasonable policies and procedures designed to detect, investigate, and prevent all forms of insurance fraud that may occur in our day-to-day operations. If fraud is detected,

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the Order will conduct a prompt and thorough investigation and will take appropriate disciplinary and legal action, including reporting to authorities as required.

We are all committed to integrity and avoiding any instances of fraud during the course of the Order's business. Any employee who becomes aware of or suspects identify theft or fraud must report it immediately to the Chief Compliance Officer.

## Money Laundering

Money laundering is the process by which persons or groups try to conceal illegal funds or make the sources of their illicit funds look legitimate. The Order's AML Program establishes the policies, procedures, and controls to ensure that employees do not engage in or unknowingly assist others in engaging in money laundering. Each Order employee who administers, sells, or services any covered insurance product must be familiar with and comply with the Order's AML Program. Any person who becomes aware of suspicious activity indicating potential money laundering activities must immediately report it to the Chief Compliance Officer.

## Ensuring Service Quality

Integrity, Professionalism, Excellence, and Respect should drive all of our relationships with our members, customers, and each other. We must always follow our internal procedures diligently. Speak with your manager or supervisor immediately if you learn of any issues relating to quality control or unacceptable performance.

These standards hold especially true for those who sell our products. Personnel catering to insurance clients must know both our products and those of our competitors. They should also know the impact of tampering, exchanging, changing, reducing, or otherwise amending a member's present insurance program. Changes should not be made to a member's program unless the changes benefit the member in some way.

## Engaging in Ethical Sales and Marketing

We must engage in fair dealing practices at all times. Personnel involved in selling, advertising, promoting and marketing our products must ensure that our business conduct is always guided by integrity and professionalism. This means behaving with accuracy and honesty when representing the features and costs of our products. It also means never making unfair or inaccurate comparisons between our competitors' products and our own. We must always keep our Core Values in mind when engaging in sales and marketing activities and never conduct ourselves in a manner that might bring negative attention to the Order.

**Q** Steven is a Field Agent who sells the Order's insurance products. After meeting with a potential new customer, he is concerned because the applicant asked unusual questions about changing addresses and taking out loans against the insurance policy, and refused to clearly provide all of his identifying background information. Is there any action Steven should take, based on his concerns?

**A** Yes. Steven and his General Agent must ensure that their supervisors and the Chief Compliance Officer are informed of Steven's observations and concerns. We each have a responsibility to communicate any unusual activity that we notice. Steven has found several red flags that could indicate possible identity theft, fraud or money laundering, so he must take extra precautions. Even if he later finds that the applicant is a legitimate purchaser, the Order protects him from retaliation for reporting in good faith.

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When dealing with our members and their families, follow these policies:

- Keep informed and fully comply with all state and provincial laws and regulations, as well as the rules of the Order, when soliciting or selling the Order's Insurance products
- Never endorse, deposit cash or negotiate any check payable to the Order when soliciting or selling the Order's insurance products
- Only use sales materials approved by the Order
- Do not publicize or advertise the Order's name in any medium including newspapers, magazines, websites, social media, radio, council or state bulletins unless the content of the message has been submitted to the Supreme Council and authorized in writing
- Do not sign as a witness to any person's signature, or any application or other paper relating to the Order's business, unless the signature occurs in your presence
- Do not sign the name of any other person, whether or not the person consents
- Deliver all policies and contracts to the respective owners without delay, and re-explain and review the plan
- Never alter or modify policies, illustrations, or any other printed material issued from or originating at the Supreme Council headquarters
- Ascertain that insurable interest exists before writing an application for insurance
- Present honestly and accurately all facts necessary to enable a member to make an informed decision

## Following Competition Laws

We all must act with integrity and respect for our competitors and members when competing for business. We support ethical and lawful competition so our customers can receive superior service at an appropriate and fair price. Laws regarding competition can be complex, but there are some basic ways to keep the marketplace open and honest.

## Prohibited Agreements With Competitors

We cannot enter into any formal or informal agreements with our competitors that may restrain free and open trade. Agreements that seek to fix prices, rig bids, or divide and allocate markets or customers are illegal. Be careful not to share our confidential or proprietary information with our competitors, as it could lead to prices or practices that adversely affect our customers. In a situation where a competitor wishes to discuss any of these topics, immediately end the conversation and report the activity to the Chief Compliance Officer or the Legal Department.

## Handling Competitive Information

Competitors' non-public, confidential, or proprietary information should never be sought or obtained. Typically, data such as costs, internal customer lists, and marketing strategies are not available publicly. We cannot seek or use such information obtained through third parties or former employees. It is forbidden to use deception, such as posing as a potential customer, to find out competitor information.

## Abiding by Trade Controls

It is critical that we carefully comply with all national and local rules and regulations that govern our international trading activity. We must always understand and follow laws relating to exports, re-exports, or imports from the U.S. and, in certain circumstances, overseas.

An export is a product, service, technology, or piece of information that is shipped to a person in another country. An export can also occur when technology, technical information, or software is provided in any way (including verbally, in the case of information) to a non-U.S. citizen located in either the United States or another country. Before engaging in exporting activity, you must verify the eligibility of both the location of delivery and the specific recipient. You must obtain all required licenses and permits, and pay all proper duties.

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This can be a very complex area of the law, so if you have any questions, please contact the Legal Department.

## Boycotts and Restricted Countries/Sanctions

The Order is required to abide by economic and trade sanctions which are administered and enforced by the U.S. Department of Treasury's Office of Foreign Assets Control (OFAC) and Canada's Office

law, we must not cooperate with any request concerning unsanctioned foreign boycotts (boycotts not initiated by our government) or related restrictive trade practices. This means we cannot take any action, furnish any information, or make any declaration that could be viewed as participation in an illegal foreign boycott. There are severe penalties for violation of these laws. Further, we are required to report any suspected boycott requests to the U.S. government. If you receive such a request you must immediately notify the Compliance and Legal Departments.

**Q** Susan received an inquiry this morning from a member in Florida who wants to pay for new memberships to the Order for his friends in Cuba. Although Susan knows that the Order cannot accept money directly from Cuba, she assumes that if the money for the membership fees does not come directly from Cuba it can be accepted. Is she correct?

**A** No. While the U.S. government has at times relaxed certain restrictions against Cuba, in general most transactions between U.S. persons and Cuba are still prohibited. Regardless of whether the transactions, products or services directly or indirectly benefit an individual or entity in a sanctioned country, it may be a violation of U.S. Law and our own policy to engage in the transaction, product or service. Because this is a complicated situation Susan must contact the Chief Compliance Officer or Legal Department for advice.

of the Superintendent of Financial Institutions (OSFI). These sanctions may restrict the Order from engaging in any business with sanctioned countries or with specific individuals or entities subject to such sanctions.

We may also be approached to boycott certain countries, companies, or other entities. Under U.S.

## Participating in Community Interests

### Political Activities

The Order encourages all personnel to participate in the democratic process and become involved in personal political activities. When we do engage in political activity, however, it must always be clear that we do so in a personal capacity and not on behalf of the Order.

We must never provide personal contributions to a political campaign in the name of the Order, and we must never seek reimbursement for personal political contributions.

Any contact we have with regulators, legislators, or other elected officials that may be viewed as lobbying, such as requests for administrative or legislative action, should never be undertaken in the name of the Order. Personnel whose responsibilities may be affected by lobbying laws must seek counsel from the Legal Department to determine whether disclosure, registration, or other rules apply.

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*Regardless of the role you hold, take care not to exert pressure on others to accept or support your political point of view.*

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# CONTACT INFORMATION

COMPLIANCE - 4122 or 4841

ETHICS HELP LINE: 1-855-806-7346

Managers and employees also have the ability to enter  
their concerns online using the link below:

<https://reportlineweb.com/kofc>

