



ETHICS PROTOCOL OF THE SOCIETY OF ST PAUL

2012 - 2016



PART I

1. PREMISE

1.1 The *Society of St Paul* is a religious Congregation founded by Fr James Alberione in Alba, in the province of Cuneo (Italy) in 1914. It was founded with the mission to spread God's Word through printing, considered the fastest means that soon would be joined by other means: the cinema, radio, television ... and today, the forms of communication that make up the digital world.

1.2 With this new form of preaching, Fr Alberione comes out of churches and requires an organized labour, goes beyond the traditional pastoral improvisation and transforms his mission in "company" at the service of the Gospel, leaving the territory of the parish, making the world his own mission field.

From the first moment – and with the difficulties of all beginnings – the *Society of St Paul* prefers the excellence of the Christian faith, of morality, of liturgical life as they derive from the sources of Sacred Scripture. The constant commitment of his work implies a triple fidelity. *Toward God*, the source of the message of Salvation; *towards humanity*, the recipient of that message, and finally towards the instrument through which the effort takes shape: *communication* in all its operational features, which Fr Alberione expresses briefly in the trinomial: creativity, technical execution and diffusion.

The model which inspires the presentation of the faith and the Christian interpretation of human reality, mediated by our communication activity, is the Apostle Paul and this reference justifies the name that we carry: *Society of St Paul*. To propose to the greatest number of people around the world the contents of our editorial activity, we take special care to ensure that our products reach the peo-



ple, without forgetting the people of culture, especially the experts in communication that we want to involve also as collaborators in our preaching activity.

An entrepreneurial activity so complex is made possible and can only be effective if everyone's work is clearly assigned and lived in the prospect of the realization of the common mission.

1.3 The management of the entrepreneurial activities of the *Society of St Paul* pushes to deepen the ethical implications in the different traditions, ways, customs to lead them to a more rational and reasonable approach. That which has to be established here, then, is an *Ethics Protocol*, a reliable reference to rules of general conduct of our apostolic activities.

1.4 This *Ethics Protocol* necessarily and implicitly takes into account the ethical bases contained in the *Social Doctrine of the Church*¹, in the *Code of Canon Law*, in the *Constitutions and Directory* of the *Society of St Paul*, in the *Service of Authority in the Society of St Paul. Manual* (=SoAM), in the respective *Civil Codes* and in our particular history and tradition. With this instrument it wants to help ensure that our responsibility rests on objective ethical bases, disciplining some problematic aspects found in various States and Countries.

2. INTRODUCTION

2.1 Importance, popularization and implementation of the *Ethics Protocol*

Like in the elaboration and the implementation of the circumscriptional *Apostolic Project*, the sharing and the knowledge on the

¹ Cf. PONTIFICAL COUNCIL OF JUSTICE AND OF PEACE, *Compendium of the social doctrine of the Church*, Libreria Editrice Vaticana, City of the Vatican 2004.



part of all are indispensable (from the Superiors, to the Persons responsible, to the employees...) so, also for the *Ethics Protocol*, the Superiors are the first ones to assume the responsibility of realizing and demonstrating the leadership necessary for the dissemination, the interiorization and the formation of all, underlining in one's Circumscription with particular lines of behaviour that are contained in the *Ethics Directory* (cf. *Guide for Elaborating the Ethics Directory in the Society of St Paul 2012-2016*).

2.2 Meaning and value of the *Ethics Protocol*

The *Society of St Paul* intends to put in order on the international level its apostolic activity, making sure that the human resources at its disposal operate within ethical bases that are objectively indisputable. At the same time it intends to be vigilant so that acts may not be committed that may not only discredit its image but eventually may involve the application of monetary and/or legal sanctions that the Legislation or the civil Laws provide in each individual State and Country. To such end, the *Society of St Paul* has decided to adopt, following the norm of the *SoAM* (nos. 130.2 and 206.2/1), the present *Ethics Protocol*, directed to introduce a system of principles and rules that will discipline the behaviour of all the components of its apostolic organization in its rapports *ad intra* and *ad extra*.

2.3 Ethical principles of reference

2.3.1 The members of the *Society of St Paul*, known as "Paulines," commit themselves in the diffusion of the Christian message by using the means that technology puts at the disposition of the man of today in order to communicate. They operate in thirty-eight nations. Many are the areas of activity: book publishing, journalism, cinema, music, television, radio, audiovisuals, multimedia, Internet; centres of study, research, formation, animation.



2.3.2 The *Paulines* form part of the «admirable Pauline Family» (Paul VI), that was also founded by Father Alberione, and composed of four feminine Congregations: *Daughters of St Paul*, *Sister Disciples of the Divine Master*, *Sisters of Jesus the Good Shepherd*, (Pastorelle Sisters), *Institute of Mary Queen of the Apostles* for vocations (Apostoline Sisters); four aggregated Institutes to the SSP: *St Gabriel the Archangel*, *Jesus Priest*, *Mary Most Holy of the Annunciation*, *Holy Family*; and *Association of Pauline Cooperators*.

The Pauline Family as “religious” Family has as integral ethical reference the Gospel of Jesus Christ as St Paul lived it, which he has summarized in the affirmations: «It is no longer I who live, but it is Christ who lives in me» (*Letter to the Galatians* 2,20; cf. *Constitutions and Directory*, art. 8) and «I have become all things to all people, that I might by all means save some» (*First Letter to the Corinthians* 9,22). This reference – even with the necessary adaptations – intends to also inspire the present *Ethics Protocol*.

2.4 The trademark “St Pauls”



2.4.1 From 1991 the trademark “St Pauls”, as the only institutional identification, also connotes every apostolic activity of the Society of St Paul, all the Pauline products and represents dynamically their presence.

It is composed of an icon on the one part, accompanied by the written words: *San Paolo*, *San Pablo*, *PAULUS*, *St Pauls*,... and on the other part the Nation in which it is used.

2.4.2 «In the trademark of the *Society of St Paul*, the two dimensions of its mission intersect: in the two lines, descending and ascending, we can perceive the salvific movement of the Word; dynamism which is almost a going and coming of humanity along the dorsal of the Word. [...] Neither must we forget the extremely stylized allusion to the sword of Paul, the “two-edged” sword (*Letter to the Hebrews* 4,12), which expresses the penetrating power of the



Word, apt to discern the true from the false, the just from the unjust, the good from evil, the beautiful from the ugly. But the allegory of God's transcending Word, in the trademark, is horizontally integrated by the helicoid, which to an observant eye can allow glimpsing a "P", the initial of Paul, a key word in our institutional and apostolic identity. The helicoid expresses also, in its enveloping rotary manner, the fundamental prerogative of our mission: the Pauline and Alberionian universalism, which characterizes in an unmistakable way the cosmic vocation of our apostolate, and which remains as an essential evangelical criterion, both in the choices of our recipients – all men, indeed the whole universe – and in those of our apostolic contents.

These dimensions integrate themselves in an organic saving project, lowered down in the space and time of every generation. This is the "theology" of an ecclesial organism that proposes to promote evangelization "by means of the apostolate through the means of social communications."

It is the Pauline charism, which in its turn finds its source of membership in a community which fraternally lives charity, serving the Word and helping men to discover God in the signs of the times and in daily events. In fact, it must not be forgotten that the Pauline mission, the charism of communication, will be all the more strong and noticeable by outside folk, the more solid will be the communion in charity within the Congregation and the Family.

From the Spirit, therefore, comes the force, the origin and the reason of that community of life, in the *Society of St Paul*, and in the inside of the more articulated Pauline Family, which is not simply an instrument to reach the goals of our apostolate, but itself is a sign and witness of service to the Word. Of course, in the specific charism of the *Society of St Paul* strong is the attention to novelties, even the technological ones, but in fidelity to principles that inspire service for man, in the steps of the Magisterium of the Church, which is the original justification of the global, organized and operative presences



willed by the Founder, who in turn is himself an instrument of the Spirit and prophet of the Word.»

Thus Fr. Renato Perino expressed himself, then Superior General of the *Society of St Paul*, explaining the new trademark “St Pauls” in *One trademark, one symbol*, introduction to *The trademark of the Society of St Paul*, vol. I: *General Concepts*, SASP, Milano [1991], pp. 2-4



PART II

ETHICS GUIDELINES IN THE SOCIETY OF ST PAUL

The *Society of St Paul* carries out its activity based on the *Ethics Guidelines* contained in the present *Ethics Protocol*. The documents have as their “recipients” the same members of the *Society of St Paul* as well as the collaborators and those with whom it entertains rapports on various designations: Persons, Entities or Societies or Trusts.

1. GENERAL LINES

1.1 Work rapports

The *Society of St Paul* commits itself not to undertake or continue any working rapport with anyone who fails to observe the ethical principles and professional correctness through their behaviour. The recipients therefore will have to follow the dispositions of the present *Ethics Protocol*.

1.2 Respect for laws and regulations

The *Society of St Paul* has, as an unavoidable principle, respect for the civil laws and regulations current in all the States or Countries wherein it operates. These will have to be followed by the recipients of the present *Ethics Protocol* and by the consequent circumscriptional *Ethics Directory*. The third Parties which collaborate with *Society of St Paul* are bound to conform themselves to the *Ethics Guidelines* with regard to work rapport and/or the rendering of services.

1.3 Role of “legislator” and of control

The *Society of St Paul*, also in case of transferring to a Society constituted *ad hoc* the exercise of governance on other societies of



the company with tasks of direction and coordination, affirms its own role of “legislator” of the *Ethics Guidelines* to which all must subject, conform and adhere themselves, even in the realization of the models and of the internal organizational processes, maintaining in that regard the power of control.

1.4 Authorizing powers

In the attribution of powers or in the conferment of delegation and powers of attorney, with particular reference to the attribution of authorizing powers and of signature, the Societies or juridical Entities are bound to act in coherence with what is provided by the *Society of St Paul* as a *moral Entity* following the norm of *SoAM* (nos. 035, 035.2; 408).

1.5 Power of signature

Regarding the organizational and management responsibilities, in the societies of the *Society of St Paul*, unable in every case to attribute to just one person powers or delegations inherent in the matters for which the *Society of St Paul* comes out as head, the norm of the separate signature is in force; while for the extraordinary administration the reservation for the joint signature is in force.

1.6 Powers of attorney and delegation

Those who carry out acts in the name and in behalf of the *Society of St Paul* in virtue of powers of attorney or delegation, must act within the limits of the same. It is forbidden to the titulars, outside the predetermined limits and to those who do not have the powers of attorney or delegation, to commit or make believe that they can commit the *Society of St Paul* in the carrying out of their tasks and activities.

1.7 Personal interests

The recipients of this *Ethics Protocol* must avoid every situation of compromise and abstain from every activity that may place personal interests before those of the *Society of St Paul*, or may con-



dition, really or apparently, their contribution to the attainment of the predetermined objectives.

Every form of collaboration must be avoided which enters in conflict with the responsibilities assumed for the *Society of St Paul*.

It is the duty of the recipients to report conflicts of interest and refer them to the attention of those directly responsible (Directors of functions, or Major Superiors, ...). The certification of the activity undertaken has to be justified and documented.

Situations that can create conflict of interest include:

- a) to have economic interests with users, clients, suppliers or competitors even passing through family members;
- b) to have economic interests with the *Society of St Paul* itself, through family members, relatives, friends, users, etc.;
- c) to establish working rapports with close relatives;
- d) to establish working rapports of family members with users, Societies or Entities with which one collaborates, clients, suppliers or competitors;
- e) to have interests in another Society of the sector;
- f) to carry out a second work, contextually and contemporaneously, omitting one's primary responsibility;
- g) to administer or direct another company;
- h) to be the leader of organizations in contrast with the activity or the mission of the *Society of St Paul*.

1.8 Entrepreneurial Associations

The recipients commit themselves not to promote, constitute or organize associations, in the national territory or abroad, aimed at acquiring the management or control of the economic activities, concessions, authorizations, contracts and services without due authorization from their respective competent Superiors.

1.9 Full use of working time

The recipients cannot carry out, during their working time, other activities that are not pertinent to their assignments and responsibilities in the organization.



1.10 Responsibility and care over goods and resources

Every recipient of this *Ethics Protocol* is directly and personally responsible for the protection and conservation of the physical goods and the resources entrusted to him/her in order to lead and bring to completion his/her tasks – whether human, material or non-material resources – as well as the use of the same in a proper way and conformed to the social interest.

1.11 Use of company's goods

The use of company's goods such as premises, equipment and private information of the *Society of St Paul*, is not allowed for personal use and interest.

1.12 Respecting author's rights

The *Society of St Paul* commits itself to respect the author's rights in its production, and requires its dependents to abstain themselves from violating such norm. It is further prohibited to engage in negotiations with one who does not follow legality and transparency to that regard.

2. INTERNAL ORGANIZATION

2.1 Correctness and veracity in legal fulfilment

The *Society of St Paul* disapproves of any behaviour, done by anyone, directed to alter the clarity, the correctness and the veracity of the data and of the information contained in the balances, reports or in other communications provided by law, addressed to the Major Superiors, to the Associates, to the administrative body, to the public and to eventual organizations of control, like for example the organizations above the circumscriptions (General Government, General Bursar's Office, CTIA, CIDEP, CAP-ESW and GEC). All the persons appointed for the formulation of the above-mentioned acts are bound to verify, with due diligence, the correctness of the data and of the information that will be received for the redaction of the acts



mentioned above. All the data of the balance, the determination and quantification of which presuppose the discretionary evaluations of appointed Functions/Directions, must be supported by suitable documentation and by choices that are legitimate, shared and at all times sustainable.

2.2 Prohibited operations

Any type of operation susceptible to harm creditors is not allowed.

2.3 Patrimony and image

It is forbidden to give existence to any behaviour directed to cause harm to the integrity of the social patrimony and image of the *Society of St Paul*.

2.4 Administrative organizations

In the *Society of St Paul* it is unacceptable to do any act, whether simulated or fraudulent, directed to influence the will of the components of the organizations of the administration or of the assembly of the Associates in order to obtain the irregular formation of a majority and/or of a deliberation different from that which would have been assumed.

2.5 Protection of privacy

The recipients are bound by the obligation of confidentiality and protection of personal and company data, for the purpose of guaranteeing a correct management of information and, therefore, of forestalling hypotheses of alteration and/or illicit communication of data treated.

2.6 Informative system

The *Society of St Paul* condemns whoever introduces himself/herself abusively into the informatics or telematics system protected by security measures, or destroys, deteriorates, cancels, alters or suppresses information, data or informatics programs of others, of



the company, of the State or Country or of other public Entity or of one that can be led to this, or else whoever puts at the disposal the equipment, the devices or the informatics programs capable of procuring what is described in precedence.

2.7 Informative documents

The *Society of St Paul* condemns whoever produces false informative documents, whether private or public, that can have probative efficacy in court.

2.8 Safeguard CED (Centre for the Elaboration of Data)

The *Society of St Paul* explicitly forbids anybody to install equipment apt to intercept, impede or interrupt communications relative to an informatics or telematics system or else running within several systems.

2.9 Company secret: violation of information

The *Society of St Paul* explicitly forbids anybody who abusively procures, reproduces, disseminates or hands over codes, passwords or other means suited to access to an informatics or telematics system protected by security measures.

2.10 Consultations

The *Society of St Paul* can establish any kind of consultation or professional service provided there is guarantee of compatibility, adequateness, inherence and documentation in the rapport.

2.11 Administrative operations

Every operation and/or transaction, whether administrative, economic, or financial, understood in the widest sense of the term, must be legitimate, authorized, coherent, congruous, documented, registered and at any time verifiable. All those who effect the above-mentioned operations must guarantee the traceability of the justifications that have allowed their execution, the evidence of the eventual authorizations and the modalities of execution of the same operation.



2.12 Purchases

The dependents and the persons authorized to make purchases of goods and/or services, including external consultancies, in behalf of the *Society of St Paul* or as members of the same, must respect the principles of correctness, inexpensiveness, quality and lawfulness and operate with the diligence of the wise and honest administrator.

2.13 Suppliers

The *Society of St Paul*, in the choice of its suppliers, must always follow objective and documentable criteria and adopt behaviours oriented to the greatest competitive advantage for the *Society of St Paul*, assuring and guaranteeing at the same time, all the suppliers sincerity, impartiality and equal opportunities of collaboration.

2.14 Responsibility of direction

Every Function/Direction is responsible for the veracity, authenticity and originality of the documentation produced and of the information rendered in the carrying out of the activity of its competence.

2.15 Sponsorings

The activities of sponsoring eventually made by the *Society of St Paul* can be destined exclusively in favour of the Entities and/or Organizations of sure reliability and ethicality and which give adequate guarantees with regard to the correct destination of sums distributed or of products supplied. The subjects tasked by the *Society of St Paul* to manage such activities are bound to verify, to the degree of their competence, the correct use of the funds, requiring in every case that the initiatives undertaken be supported by adequate and truthful documentation.

2.16 Requests on the part of the competent Organs

The *Society of St Paul* requires that its members, the administrators, the consultants and the dependents keep a correct and trans-



parent conduct, showing cooperation and diligence especially as regards any request made by the Bursar/Treasurer, Directors, Associates, Organs of control and other social Organs and even the continental or international ones (CTIA, CAP-ESW, CIDEP, GEC).

2.17 Protection of the veracity of information

It is forbidden to disseminate false news about the apostolic Work, whether inside or outside of the *Society of St Paul*, to the members of the *Society of St Paul* itself, to the Associates, to the dependents, to the collaborators, to the consultants and to the third parties that work for it.

2.18 Inspections and verifications

In occasions of verifications and inspections on the part of the competent public Authorities, those who are Responsible must keep an attitude of utmost availability and cooperation toward the inspecting and controlling organs. It is forbidden to obstruct, in any way, the functions of the public Authorities of vigilance when they enter into contact with the *Society of St Paul* by way of their institutional functions.

2.19 Company secret

It is forbidden to manifest behaviours directed to the exploitation of privileged information possessed by subjects belonging to the *Society of St Paul* for motives connected to the development of one's functions and company competencies. The recipients must act guaranteeing the defence and protection of the company data treated, the respect for professional secret and the safeguarding of information kept in their possession.

2.20 Alteration of the economic value of the *Society of St Paul*

It is illicit to disseminate false news, or put in simulated operations or other artifices concretely suited to provoke a sensible alteration of the economic value of the *Society of St Paul* and/or its economic or patrimonial components.



3. RAPPORTS WITH THE PUBLIC ADMINISTRATION

3.1 Public Administration

The recipients who act in the name and in behalf of the *Society of St Paul* in their rapports with the Public Administration in every State or Country, should inspire and adapt their conduct to respect of the law, of impartiality and of the good progress to which the Public Administration is bound.

3.2 Unacceptable behaviours

The *Society of St Paul* condemns any behaviour adopted by their religious and lay collaborators, consisting of promising or offering, directly or indirectly, money or other utilities to Public Officials and/or In-charge of Public Service in their respective State or Country.

It is not allowed to offer and/or receive any object, gift, service, performance or favour, directly or through an intermediary, from Public Officials and In-charge of Public Service, dependents, their relatives, except when it is a matter of gifts or other utilities of moderate value, such that it does not compromise the integrity and the reputation of one of the parties, and does not influence the autonomy of judgment of the recipient and, in any case, is part of ordinary practices and customs.

3.3 Destination of contributions, donations, fundings or financings

It is not allowed to destine for different purposes what has been granted, contributed, donated, funded or financed by the State, by other public or private Entity, by persons, etc.

3.4 Correctness of obtaining contributions, financing, loans

The *Society of St Paul* deplores any behaviour intended to obtain, from the State, public Entity, company, or benefactor, any type of contribution, financing, soft loan or other beneficence of the same type, by means of altered or falsified declarations and/or documents



or, more generally, through artifices or tricks, including those realized by means of an informatics or telematics system intended to induce into error the contributor.

3.5 Rapports with Public Service

The administrators tasked by the *Society of St Paul* to follow up any business talk, request or rapport with the Public Administration, national and/or foreign, must not, for any reason, try to influence improperly the decisions of the Public Officials or In-charge of Public Service who deal with and who take decisions in behalf of the Public Administration, national and/or foreign. In the course of a business negotiation, request or commercial rapport with Public Officials and/or In-charge of Public Service, national or foreign, companies of the State, the following actions cannot be undertaken, directly or indirectly:

- a) proposing, in any form, employment and/or commercial opportunities that can give advantage to Public Officials and/or In-charge of Public Service, Companies or suppliers in a personal capacity or through an intervening person;
- b) offering in some way money or other utility that are not duly justified by the transaction or contract;
- c) soliciting or obtaining private information that can compromise the integrity, the reputation and the confidentiality of both parties;
- d) to do any other act intended to induce the Public Officials, national or foreign, Companies or suppliers, to do or omit to do something in violation of the laws of the institution to which they belong.

3.6 Judicial Authority

Every Function/Direction must entertain rapports with the Judicial Authorities closely connected to the carrying out of the tasks that are proper to it, avoiding putting in existence every activity that can presuppose an attempt of undue influence.



3.7 Requisites for rapports with public subjects

The persons of the *Society of St Paul* tasked to entertain business rapports with public subjects of a foreign State can put in existence activities and/or actions binding for the *Society of St Paul* exclusively with subjects who have duly demonstrated the legitimacy of powers recognized for them by the foreign State to which they belong, besides the requisites of honesty and correctness. All rapports are forbidden with subjects that do not satisfy the above requisites.

3.8 Assumptions

It is prohibited to assume or ask to assume employees or ex-employees of the Public Administration, national or foreign (or persons pointed out by the same), who, because of their institutional functions, have entertained decisive rapports with the *Society of St Paul*, except when said rapports have not been preliminarily and adequately evaluated by the *General Director of the Apostolate*.

4. RAPPORTS WITH CLIENTS, SUPPLIERS AND OTHER SUBJECTS

4.1 Quality control

The correct and transparent rapport with clients and suppliers represents an important aspect for correct management in the *Society of St Paul*. To the clients and suppliers must be given exhaustive and accurate information on products or services, so as to avoid false publicity.

The *Society of St Paul* commits itself to monitor periodically, based on predetermined levels, the quality of products and services offered, to guarantee the adequateness of the same.

4.2 Estimates

The choice of suppliers, in the same way as the determination of terms and conditions of acquiring goods and services for the *Society of St Paul* or its companies, must take place exclusively on the basis of estimates that guarantee the best quality, better cost and con-



venience for the *Society of St Paul* itself, making use of the written form and guaranteeing equal opportunities for every supplier.

4.3 Presents and tips

In rapports with clients and suppliers it is not admissible to offer or receive any benefit (direct or indirect), gifts of any nature, except of extremely moderate value, so as not to compromise the image of the *Society of St Paul* and not to be interpreted as intended to obtain a favourable treatment which is not determined by the rules of the market. In any case, eventual gifts and tips must be communicated and submitted to the decision of the one directly responsible. Any company contribution that may be considered a donation of great entity must be examined by the *General Director of the Apostolate* and by his Council, to which the decision is due.

4.4 Contributions to political and company organizations

The *Society of St Paul* refrains from giving any contribution, direct or indirect, under any form, to parties, movements, committees and political and company organizations, to their candidates or representatives. The *Society of St Paul* does not owe any reimbursement to subjects who carry out contributions for personal reasons and subjects to disciplinary procedure one who promises or carries out payments at the expense of the same *Society of St Paul*.

4.5 Political and company commitment

The dependents recognize and accept that any involvement of theirs in activities with representatives of political and company organizations (exception is made for eventual contacts that are necessary or instrumental for the carrying out of the institutional activities of the personnel Office of the Society) takes place exclusively in a private capacity, in conformity with current laws and not in behalf of the *Society of St Paul*.

4.6 Information and media rapport

The rapports with external media or information organizations will have to be held exclusively by those in-charge of the specific



function, in conformity with the directions of the *Director General of the Apostolate*. Every request for information coming from the media or organs of information will have to be directed to such company function in the same way as all public declarations; interviews and press communiqués will have to be agreed upon beforehand with the same.

5. PERSONS

5.1 Human resources

The *Society of St Paul* recognizes the central role of the human resources as an indispensable element for the development and success of its activity. To all its dependents, in relation to their specific competencies, professional qualifications and capacity to produce, are offered adequate working opportunities without any discrimination of sort.

5.2 Ethical formation

The *Society of St Paul* provides for the ethical formation of all its personnel. Such formation (knowledge, acceptance and implementation) is entrusted to the *Ethics Committee* (see ahead, title 7) who will implement it by means of organizing seminars and specific meetings.

5.3 Selection and search

The process of selection of personnel and the search for new resources is justified and motivated by exclusive company needs and/or specific needs requested by the Functions/Directions. Within the limits of available information (in relation to the policy of human resources) and to guarantee all concerned subjects with respect to equal opportunity, the correct measures have to be adopted to avoid favouritism, nepotism or forms of patronage system in the selection process and the assumption of personnel.



6. HEALTH AND SECURITY IN WORK

6.1 Security and health

The *Society of St Paul* commits itself to guarantee the security and the health of its workers in all the environments connected with work, out of respect for current legislation.

6.2 Non-observance of normative and company measures

The *Society of St Paul* condemns any act or conduct that involves non-observance of normative and company measures for the protection of the health, hygiene and security of the workers in time of work.

This aspect will have to be carefully regulated by the *Ethics Directory of the Society of St Paul* of every State or Country.

6.3 Duties in matters of health and security in work

The dependents are bound to respect their principal duties and obligations in matters of health and security in the workplace. Each collaborator must take care of his/her security and health and the health of the other persons present in the workplace, who may suffer the effects of their actions or omissions.

6.4 Environment and work climate

The *Society of St Paul* and its collaborators commit to create an adequate climate, pleasing and of quality in the various places of work, and guarantee the adequateness of the same in relation to the neighbourhood, based on predetermined disciplinary levels.

7. ETHICS COMMITTEE AND ETHICS DIRECTORY

7.1 Functioning and observance of the *Ethics Protocol of the Society of St Paul*

The task of keeping watch on the functioning and observance of the *Ethics Protocol* and *Ethics Directory*, adopted by the *Society of St Paul*, is entrusted to the *Ethics Committee*, endowed with powers of initiative and control.



7.2 Appointment of the *Ethics Committee*

The *Ethics Committee* is appointed by the *Major Superior* upon indication of the *Director General of the Apostolate* (cf. *SoAM*, no. 236.6).

7.3 Tasks of the *Ethics Committee*

To the *Ethics Committee* are attributed the following tasks:

- a) to divulge and verify the application of the *Ethics Protocol* and of the respective *Ethics Directory*;
- b) to receive and analyze the reports of violations of the *Ethics Protocol* and of the *Ethics Directory*;
- c) to analyze the proposals of revision of the policies and procedures susceptible to ethical company deficit and to prepare hypotheses of solution to be submitted to the evaluation of the *Major Superior*, the *General Director of the Apostolate* and of his Council;
- d) to propose to the *General Director of the Apostolate* the modifications and the integrations to be made on the *Ethics Directory*.

7.4 Violation of the *Ethics Protocol* and of the *Ethics Directory*

Eventual reportings of violation, or suspicion of violation, of the *Ethics Protocol* and of the *Ethics Directory* have to be communicated to the *Ethics Committee*, which in turn has to provide for the analysis of the reportings. The *Ethics Committee* has to guarantee however the confidentiality on the authors of the reportings. The *Ethics Committee* makes a specific report which it transmits to the *Major Superior* and to the *General Director of the Apostolate* on the violations of the *Ethics Protocol* and/or of the *Ethics Directory*.

7.5. Procedure for the reportings

All the reportings have to be formulated in written form and countersigned and sent directly to the *Ethics Committee* of the *Society of St Paul* there where it resides.



7.6. Competencies of superior Authority in ethical matters

In matters related to the *Ethics Protocol* and to the *Ethics Directory* the responsibilities that fall on the *Major Superior* and on the *Director General of the Apostolate* are the following:

- a) to take decisions in matters of violations of significant importance of the *Ethics Protocol* and of the *Ethics Directory* pointed out by the *Ethics Committee*;
- b) to decide on the determination of the policies and procedures, for the purpose of guaranteeing coherence between the *Ethics Protocol* and the *Ethics Directory*;
- c) to provide for the periodic revision of the *Ethics Directory*.

8. GUIDELINES OF THE SANCTIONING SYSTEM

8.1 Violation

The violation of the guidelines fixed in the *Ethics Protocol* and in the *Ethics Directory* and in the procedures provided by the internal norms, compromises the fiduciary rapport between the *Society of St Paul* and its executives, dependents at all levels.

8.2 Company procedures

The *Ethics Protocol* and the respective *Ethics Directory* are inserted inside the system of company procedures and internal norms; the violations against the *Ethics Protocol* and the *Ethics Directory* are equated to the violations of the same procedures and norms.

8.3 Violation by third parties

With regards to third parties, the violations of the *Ethics Protocol* and the respective *Ethics Directory* will be sanctioned by the *Major Superior* and/or by the *General Director of the Apostolate* with immediacy, by means of adequate and proportional measures, including the possible resolution of the contract in existence, but always respecting the current legal and contractual norms in every State or Country.



8.4 Violation by dependents

With regards to dependents, the violations of the *Ethics Protocol* and the respective *Ethics Directory* will be sanctioned by the *General Director of the Apostolate* with immediacy, by means of adequate and proportional measures, but always respecting the current legal and contractual norms in every State or Country.

8.5 Violation by members or associates

With regards to members and associates of the *Society of St Paul*, the violations of the *Ethics Protocol* and the respective *Ethics Directory* will be sanctioned by the *Major Superior* with respect to the current canonical norms, to the *Constitutions and Directory*, with immediacy, by means of adequate and proportional measures.

8.6 Sanctioning measures

The sanctioning measures in the above preceding points will be adopted by the *Society of St Paul* independently from the eventual penal relevancy of such behaviour and from the instruction of a penal process in cases wherein they constitute crime.

9. GENERAL DIRECTION OF THE APOSTOLATE

9.1 Popularization of the *Ethics Protocol* and of the *Ethics Directory*

The *Director General of the Apostolate* should make sure that the *Ethics Protocol* and the *Ethics Directory* are made known to the members of the *Society of St Paul*, to the social Organizations and to every dependent. All are bound to know their contents and to respect them.

9.2 Reporting of violations

The *Director General of the Apostolate* should make sure that the recipients are made aware that whoever comes to know of the violations of the guidelines contained in the present *Ethics Protocol*



or in the *Ethics Directory*, is bound to report them to the *Ethics Committee*.

9.3 Prevalence of the *Ethics Protocol* and of the *Ethics Directory*

The *Director General of the Apostolate* should bear in mind that in case wherein even if only one of the dispositions of the present *Ethics Protocol* or of the *Ethics Directory* enters into conflict with the dispositions provided in the internal regulations, in the flow-chart and in the organizational procedures, the *Ethics Protocol* and the *Ethics Directory* will prevail over any of these dispositions.

9.4 Prevalence of the civil legislation

The *Director General of the Apostolate* should bear in mind that in case wherein even if only one of the dispositions of the present *Ethics Protocol* or of the *Ethics Directory* enters into conflict with the dispositions provided in the civil or labour law of every State or Country, these laws will prevail over any disposition in the present *Ethics Protocol* or *Ethics Directory*.

9.5 Modifications and/or integrations

The *Director General of the Apostolate* should bear in mind that any modification and/or integration to the present *Ethics Protocol* will have to be made with the modalities adopted for its initial approval, that is, presented to the Major Superiors or upon the initiative of the CTIA and approved by the Superior General of the Society of St Paul.

10. BENEFITS OF THE *ETHICS PROTOCOL*

The *Ethics Protocol*, as thus structured, will bring concrete benefits to the *Society of St Paul*, inasmuch as it:

- a. clearly communicates the positive behaviour expected in the apostolic Work coherent with the values, strategies and laws within which it is defined;



- b. sanctions the negative behaviour – or at any rate contrary to its values – which makes difficult the realization of its mission or contradicts its norms;
- c. contributes to make clear its goals, procedures and strategic-operational lines in its apostolic activity;
- d. facilitates and makes easy its decision process;
- e. affects positively the climate of work of the organization and the relations that are to be characterized by respect, tolerance and rapports of authentic collaboration;
- f. favours continuous betterment in the organization of the various sectors, offering concrete indications in labour relations;
- g. it is a useful instrument that favours positive personnel motivation;
- h. facilitates rapports with suppliers, clients and various entities.

The *Ethics Protocol* therefore also becomes an indispensable instrument to promote and to legitimize the image of the *Society of St Paul* among all the recipients of its apostolic Work, insofar as it is a matter of declaring publicly its commitment and responsibility in accomplishing its mission.



*Approved by the General Government
Rome, 22 November 2012*



INDEX

PART I

| | |
|------------------------------------------------------------------------------------------|----------|
| 1. PREMISE..... | 3 |
| 2. INTRODUCTION | 4 |
| 2.1 Importance, popularization and implementation of the <i>Ethics Protocol</i> | 4 |
| 2.2 Meaning and value of the <i>Ethics Protocol</i> | 5 |
| 2.3 Ethical principles of reference..... | 5 |
| 2.4 The trademark “St Pauls” | 6 |

PART II

ETHICS GUIDELINES IN THE SOCIETY OF ST PAUL

| | |
|-------------------------------------------------------------|-----------|
| 1. GENERAL LINES | 9 |
| 1.1 Work rapports..... | 9 |
| 1.2 Respect for laws and regulations..... | 9 |
| 1.3 Role of “legislator” and of control | 9 |
| 1.4 Authorizing powers | 10 |
| 1.5 Power of signature..... | 10 |
| 1.6 Powers of attorney and delegation | 10 |
| 1.7 Personal interests..... | 10 |
| 1.8 Entrepreneurial | 11 |
| 1.9 Full use of working time | 11 |
| 1.10 Responsibility and care over goods and resources | 12 |
| 1.11 Use of company’s goods | 12 |
| 1.12 Respecting author’s rights | 12 |
| 2. INTERNAL ORGANIZATION..... | 12 |
| 2.1 Correctness and veracity in legal fulfilment..... | 12 |
| 2.2 Prohibited operations..... | 13 |
| 2.3 Patrimony and image..... | 13 |
| 2.4 Administrative organizations | 13 |
| 2.5 Protection of privacy | 13 |



| | | |
|-----------|-------------------------------------------------------------------------|-----------|
| 2.6 | Informative system..... | 13 |
| 2.7 | Informative documents..... | 14 |
| 2.8 | Safeguard CED (Centre for the Elaboration of Data) | 14 |
| 2.9 | Company secret: violation of information..... | 14 |
| 2.10 | Consultations..... | 14 |
| 2.11 | Administrative operations | 14 |
| 2.12 | Purchases..... | 15 |
| 2.13 | Suppliers..... | 15 |
| 2.14 | Responsibility of direction | 15 |
| 2.15 | Sponsorings | 15 |
| 2.16 | Requests on the part of the competent Organs | 15 |
| 2.17 | Protection of the veracity of information | 16 |
| 2.18 | Inspections and verifications | 16 |
| 2.19 | Company secret..... | 16 |
| 2.20 | Alteration of the economic value of the <i>Society of St Paul</i> | 16 |
| 3. | RAPPORTS WITH THE PUBLIC ADMINISTRATION | 17 |
| 3.1 | Public Administration..... | 17 |
| 3.2 | Unacceptable behaviours..... | 17 |
| 3.3 | Destination of contributions, donations, fundings or financings.. | 17 |
| 3.4 | Correctness of obtaining contributions, financings, loans..... | 17 |
| 3.5 | Rapports with Public Service | 18 |
| 3.6 | Judicial Authority | 18 |
| 3.7 | Requisites for rapports with public subjects..... | 19 |
| 3.8 | Assumptions | 19 |
| 4. | RAPPORTS WITH CLIENTS, SUPPLIERS AND OTHER SUBJECTS..... | 19 |
| 4.1 | Quality control..... | 19 |
| 4.2 | Estimates | 19 |
| 4.3 | Presents and tips | 20 |
| 4.4 | Contributions to political and company organizations | 20 |
| 4.5 | Political and company commitment | 20 |
| 4.6 | Information and media rapport..... | 20 |
| 5. | PERSONS | 21 |
| 5.1 | Human resources | 21 |



| | | |
|------------|----------------------------------------------------------------------------------------------------|-----------|
| 5.2 | Ethical formation..... | 21 |
| 5.3 | Selection and search | 21 |
| 6. | HEALTH AND SECURITY IN WORK | 22 |
| 6.1 | Security and health | 22 |
| 6.2 | Non-observance of normative and company measures | 22 |
| 6.3 | Duties in matters of health and security in work | 22 |
| 6.4 | Environment and work climate | 22 |
| 7. | <i>ETHICS COMMITTEE AND ETHICS DIRECTORY</i> | 22 |
| 7.1 | Functioning and observance of the <i>Ethics Protocol</i> <i>of the Society of St Paul</i> | 22 |
| 7.2 | Appointment of the <i>Ethics Committee</i> | 23 |
| 7.3 | Tasks of the <i>Ethics Committee</i> | 23 |
| 7.4 | Violation of the <i>Ethics Protocol</i> and of the <i>Ethics Directory</i> | 23 |
| 7.5 | Procedure for the reportings | 23 |
| 7.6 | Competencies of superior Authority in ethical matters | 24 |
| 8. | GUIDELINES OF THE SANCTIONING SYSTEM | 24 |
| 8.1 | Violation | 24 |
| 8.2 | Company procedures | 24 |
| 8.3 | Violation by third parties | 24 |
| 8.4 | Violation by dependents | 25 |
| 8.5 | Violation by members or associates | 25 |
| 8.6 | Sanctioning measures | 25 |
| 9. | GENERAL DIRECTION OF THE APOSTOLATE | 25 |
| 9.1 | Popularization of the <i>Ethics Protocol</i> and of the <i>Ethics Directory</i> | 25 |
| 9.2 | Reporting of violations | 25 |
| 9.3 | Prevalence of the <i>Ethics Protocol</i> and of the <i>Ethics Directory</i> | 26 |
| 9.4 | Prevalence of the civil legislation | 26 |
| 9.5 | Modifications and/or integrations | 26 |
| 10. | BENEFITS OF THE <i>ETHICS PROTOCOL</i> | 26 |