



CODE OF CONDUCT

OF THE ARMENIAN CATHOLIC ORDINARIATE

("ARMENIAN CATHOLIC CHURCH RELIGIOUS ORGANIZATION") FOR EMPLOYMENT, FINANCIAL, AND ECONOMIC ACTIVITIES

Introduction

This Code of Conduct is an obligatory part of the mission and work of the Armenian Catholic Ordinate. All clergy of the Ordinate, as well as employees and volunteers of all its entities, are required to adhere to this Code of Conduct.

All clergy, religious, lay employees, and volunteers of the Ordinate, parishes, and other Ordinate entities must continuously comply with the Code of Canons of the Eastern Churches (CCEO), all applicable laws and regulations of the Republic of Armenia, Georgia, the Russian Federation, and all other countries encompassed by the Ordinate's mission, as well as international conventions, and international standards and requirements for finance, asset management, and accounting. The Ordinate will not tolerate the activities of individuals who achieve results through violations of the law or through illegal and unethical transactions. This includes any payment for illegal acts, indirect allocations, kickbacks, bribery, and other similar activities.

The conduct of everyone must be distinctly above the minimum standards required by law and expected by the Church. Accordingly, all representatives must ensure that their actions are in no way interpreted as contrary to the laws, regulations, or principles governing the activities and mission of any Ordinate entity. Individuals who are uncertain about the application or interpretation of any legal requirement must present the matter to their immediate supervisor, who, if necessary, shall seek counsel from other authorized higher administrative authorities of the Ordinate.

General Conduct

All representatives of Ordinate entities are expected to demonstrate professional, Christian-like, and business-like conduct. The use of alcohol, illegal drugs, gambling, workplace altercations, profanity, and other similar unprofessional acts are strictly prohibited in the workplace. Representatives must not engage in exploitation (including, but not limited to, sexual harassment), discrimination, or retaliation, or exhibit behavior that could be interpreted as such, such as using inappropriate language or jokes, keeping or posting inappropriate materials in the workplace, or viewing inappropriate materials on work computers.

Conflict of Interest

All representatives of Ordinate entities are expected to perform their duties conscientiously, honestly, and in accordance with the best interests of the Church. Representatives must not use their position or knowledge gained by virtue of their position for private or personal benefit. Regardless of the circumstances, if a representative feels that their adopted, currently ongoing, or planned course of action could lead to a conflict of interest, they must immediately report all facts to their supervisor.

External Activities of Employees

All Church employees are called to always act in harmony with Armenian Catholic principles and doctrine, and they bear a significant responsibility for maintaining proper public relations with the community. Their willingness to assist parishes, schools, as well as other charitable and educational initiatives is encouraged. However, employees must avoid having any business interest or engaging in activities that either lead to, or appear to lead to, the following:

- Creating an excessively large demand on their time and attention, thereby depriving the Ordinariate employer of the opportunity to utilize their best efforts at work, or
- Creating a conflict of interest (obligation, interest, or distraction) that could hinder the free expression of independent judgment in the best interests of the employer.

Employees' Relations with Clients and Supporters

Employees must avoid making investments or having a financial interest on their personal account in companies that are in contractual relations with the Ordinariate or supply goods and services to the Ordinariate, if such investment or interest could influence, or give the impression of influencing, the performance of their duties and decision-making on behalf of the Ordinariate.

Gifts, Hospitality, and Services

Representatives must not accept hospitality, gifts, or personal services that could influence, or give the impression of influencing, the business decisions of the Church in favor of any person or company with whom it is possible to have business relations. Similarly, representatives must not accept any other preferential treatment under these circumstances, as this may be perceived as placing a certain obligation upon them. Meals, hospitality, holiday gifts, and other similar items that are infrequent and have a symbolic (or moderate) value are not considered a violation of this Code of Conduct. In case of doubt, the matter should be discussed with the immediate supervisor.

Illegal Kickbacks and Secret Commissions

Employees may not receive any type of payment or compensation except those authorized by their employer's compensation policy. In particular, the acceptance of illegal kickbacks and secret commissions from suppliers or other persons is strictly prohibited. Any violation of this rule may lead to the immediate termination of employment and legal prosecution to the full extent of the law.

Ordinariate Funds and Other Assets

Representatives who have access to the financial funds of Ordinariate entities in any manner must follow the established policies and procedures for the recording, disposition, and protection of those funds, as detailed in the regulations, manuals, and relevant materials of the eparchies, parishes, and other related entities. These policies and procedures are implemented to prevent fraud and dishonesty. If an employee notices any evidence of fraud or dishonesty, they must immediately inform the designated personnel so that the latter can promptly investigate the matter.

When a representative's position requires the expenditure of an Ordinariate entity's funds or the incurrence of reimbursable personal expenses, that person must exercise reasonable judgment on behalf of the entity to ensure that appropriate value (efficiency) is received for such expenses.

The financial funds and all other assets of Ordinariate entities are intended exclusively for the purposes of the given entity and not for personal benefit.

Records and Communication

A wide variety of accurate and reliable records are necessary for fulfilling various legal and financial obligations, as well as for managing the affairs of Ordinariate entities. The entity's books and records must reflect all transactions accurately and in a timely manner. Employees responsible for accounting and any other record-keeping must demonstrate diligence in performing these duties.

Representatives must not make or participate in the creation of any type of false record or communication, whether internal or external, including, but not limited to:

- False expense, attendance, financial, or other similar reports, logs, and statements;
- False advertising, deceptive practices, or other misleading representations.

Relations with Outside Parties, the Media, and Other Eparchies

Representatives must take care to separate their personal roles from their official position when communicating on matters that do not relate to the activities of Ordinariate entities. Employees must not use the symbols (identity), official letterheads, stationery, or equipment of Ordinariate entities for personal or political matters.

When communicating publicly about matters related to the activities of any Ordinariate entity, representatives must not speak on behalf of the entity or eparchy on any topic on their own initiative, except when they are fully confident that the views they express correspond to the position of the given body and it is the desire of the entity that these views be publicly disseminated.

When dealing with anyone, including government officials outside the eparchy, representatives must be careful not to jeopardize the reputation of the Ordinary, the Ordinariate entity, or any individual, enterprise, or government body, and not to damage their good name.

Effective and Accurate Communication

In all matters relating to the faithful of the parishes, churches, schools, government bodies, the public, and other members of the Ordinariate, all representatives must make every effort to ensure complete, accurate, and timely communication, responding quickly and politely to all proper requests for information and all complaints.

Privacy and Personal Data Protection

When managing the financial and personal information of the Ordinariate, parishes, the faithful, or other partners, representatives must adhere to the following principles:

1. Collect, use, and maintain only personal information necessary for operations. Whenever possible, obtain any relevant information directly from the person concerned. Use only respected and reliable sources to supplement this information.
2. Retain information only as long as necessary or required by law. Protect the physical security of the information.
3. Limit internal access to personal information, making it available only to those individuals who have a legitimate business reason to seek that information. Use personal information exclusively for the purposes for which it was originally obtained. Obtain the consent of the individual concerned before disclosing personal information to external sources, except when legal processes or contractual obligations provide otherwise.

Yerevan, July 18, 2026.

I hereby approve:

✠ Most Rev. KEVORK NORADOUNGUIAN
Titular Archbishop of Sebastia,
Ordinary of the Armenian Catholics of Armenia, Georgia, Russia
and Eastern Europe

Fr. HOVSEP GALSTYAN
Chancellor of the Ordinariate