



ORDINARIATE WHISTLEBLOWER POLICY: POLICY ON REPORTING VIOLATIONS¹

The Code of Conduct of the Armenian Catholic Ordinate requires all representatives of the Ordinate—including clergy, religious, directors, volunteers, and lay employees—to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All representatives of the Church must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the Policy on Reporting Violations are to establish rules and procedures for:

- The submission of statements on a confidential and anonymous basis by Church stakeholders regarding suspected financial or legal matters, violations and suspected violations of the Code of Conduct, the Code of Canons of the Eastern Churches (CCEO), as well as other concerns;
- The receipt, retention, and treatment of complaints received by the organization;
- The protection of any person reporting concerns (violations) from harassment and retaliatory actions.

Duty to Report

Each representative of the Ordinate is obligated to report in accordance with this policy:

- **a.** Suspected or improper accounting or auditing matters;
- **b.** Violations and suspected violations of the Ordinate's Code of Conduct;
- **c.** Other financial, legal, or canonical concerns (hereinafter collectively referred to as "**Concerns**").

Reports regarding Concerns should be submitted to the Ordinate personnel designated by the Bishop (i.e., the Vicar General, Chancellor, attorney, Chief Accountant, or internal auditor). All Concerns are to be reported as soon as possible. Reports of Concerns should include all relevant information about the suspected act, including any material evidence that exists.

Prohibition of Harassment and Retaliation

This policy is intended to encourage and enable stakeholders to raise Concerns within the organization for investigation and appropriate action. With this goal in mind, no interested person who in good faith reports a Concern shall be subject to retaliatory actions, or in the case of an employee, adverse employment consequences. Furthermore, any person who retaliates against someone who has reported a Concern in good faith is subject to disciplinary action, up to and including termination from their position held in the Church.

Investigation

¹ Note: When drafting this document, we referred to the requirements of the Code of Canons of the Eastern Churches, the results and recommendations of the survey, conducted in January 2025, by the German auditing company Empacta on the financial and economic system of the Ordinate, as well as the United States Conference of Catholic Bishops' (USCCB) guide "DIOCESAN FINANCIAL MANAGEMENT (A GUIDE TO BEST PRACTICES)".

The designated Ordinariate personnel shall be responsible for a thorough and expeditious investigation of the reported Concern. Proposed decisions on the disposition of the case will be discussed with the Bishop or his designee(s). The results of the investigation of all reported Concerns and their final resolution shall be reported to the Audit Committee.

Acting in Good Faith

Any person reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates improper accounting or auditing practices, or a violation of the Code of Conduct or other management policies. Making allegations (statements) that are unsubstantiated and proven to have been made maliciously, recklessly, or with foreknowledge that they were false will be viewed as a serious disciplinary offense and may result in disciplinary penalties, up to and including termination from one's position in the Church. Such conduct may also provide grounds for other actions, including civil lawsuits.

Confidentiality

Reports of Concerns and investigations related thereto shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may lead to disciplinary penalties, up to and including termination of the violator from their position held in the Church. Such conduct may also provide grounds for other actions, including civil lawsuits.

Whistleblower Concerns and Violations Log Form

Date of Report (DD/MM/YYYY)	Sequence No.	Description of Concern or Violation	Submitted By	Current Status	Actions Taken(with timelines & comments)
			• Clergy • Religious • Lay Employee	• Resolved • Under Investigation • Completed • Dismissed	

Date of Report (DD/MM/YYYY)	Sequence No.	Description of Concern or Violation	Submitted By	Current Status	Actions Taken(with timelines & comments)
			• Community Member • Service Provider / Vendor • Other Stakeholder	• Pending / Suspended	

Yerevan, July 18, 2026.

I hereby approve:

✠ GEVORG NORATUNKYAN

Titular Archbishop of Sebastia of the Armenians

Ordinary of Catholic Armenians of Armenia, Georgia, Russia, and Eastern Europe

FR. HOVSEP GALSTYAN

Chancellor of the Ordinariate