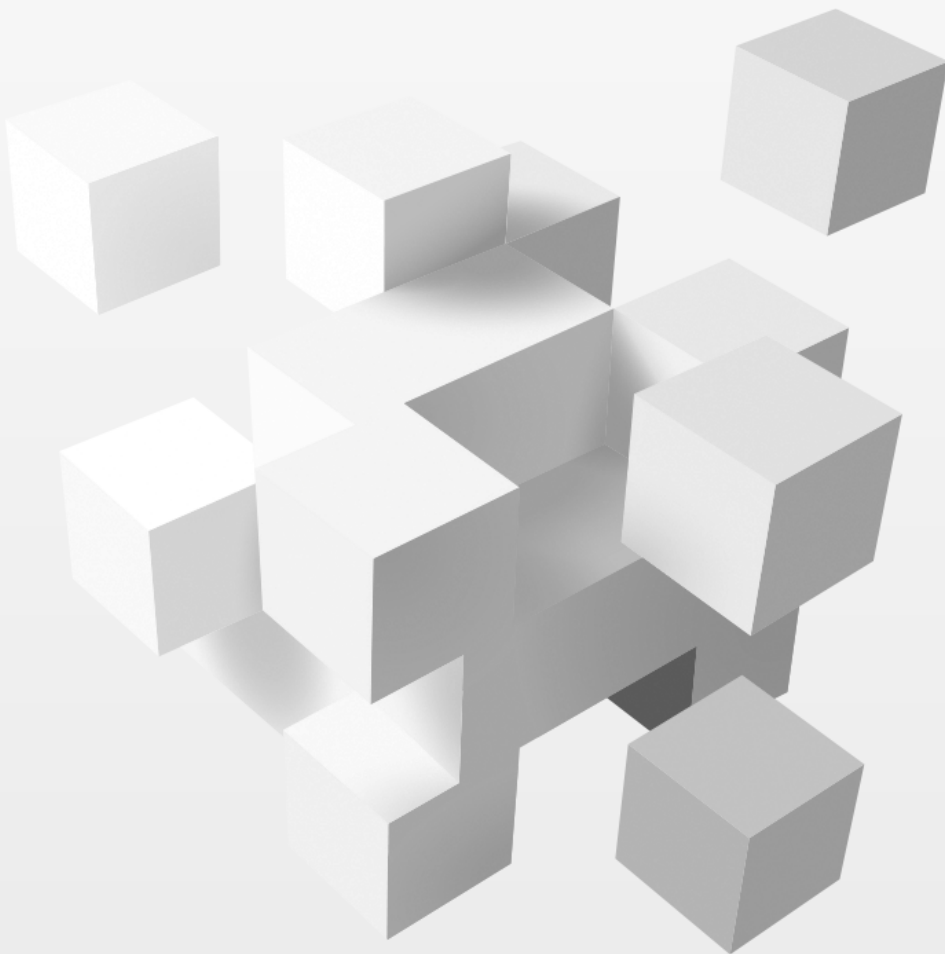


# CODE OF CONDUCT





## CODE OF CONDUCT

### APPROVED BY

the General Meeting of “Transparency International Anticorruption Center”  
public organization

on 22 December 2021

Protocol No. 21/03

This document sets out the principles of ethics, regulates the conduct of members, employees and volunteers of the Organization in their day-to-day relationships.

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## **1. GENERAL PROVISIONS**

1. The Code of Conduct (hereinafter referred to as “Code”) of “Transparency International Anticorruption Center” (hereinafter referred to as “Organization”) is a fundamental document that defines the values and principles of the activities of the Organization, the rules of conduct for the members, employees and volunteers, management, issues related to applying liability measures for violations thereof, as well as other issues associated with the relations arising from this Code.
2. The purpose of the Code is to orientate the members, employees and volunteers of the Organization into being guided by the fundamental values and principles adopted by the Organization and to act with high standards of honesty and responsibility.

## **2. THE VALUES AND PRINCIPLES OF THE ORGANIZATION**

3. The mission of the Organization is to promote good governance and democratic processes to contribute to strong statehood and a corruption-free Armenia.
4. The core values of the organization are transparency, accountability, lawfulness, courage, justice, democracy and political impartiality.
5. The organization operates based on the principle of participatory management, encouraging employee involvement in the decision-making process and ensuring transparency and accountability of the decisions.
6. The organization is open for flexible cooperation and joins the ideological and working platforms in line with the mandate of the Organization, which can contribute to the realization of its mission and statutory goals.
7. For the realization of its mission and goals, the Organization may receive funding from all, including business sector organizations and use the services of the latter where their activities do not contradict the principles and values of the Organization.
8. The organization renounces the financial means that may lead to restriction of the independence of its activities. The issue of such risk shall be discussed by the Board upon the recommendation of the Executive Director.

## **3. RULES OF CONDUCT OF A MEMBER, VOLUNTEER AND EMPLOYEE OF THE ORGANIZATION**

9. The rules of conduct of the members, employees (employees or service providers under an employment contract and a civil legal contract) and volunteers are norms governing the etiquette and relationships based on the rules and principles of integrity and coexistence, adhered to both when acting on behalf of the Organization and in daily interaction.
10. When acting on behalf of the Organization and during their work activities, a member, employee and volunteer of the Organization shall:
  - 1) be guided by the values and principles of the Organization and the established rules of conduct, and perform the requirements of the internal acts of the governing bodies concerning their powers;
  - 2) not contradict, with their words and actions, the policies and strategies run by the Organization, as well as the official positions of the Organization;
  - 3) refrain from actions that may interfere with the normal operation of the Organization or discredit and damage the Organization’s rating and reputation;

- 4) contribute, by their behaviour, to the formation and maintenance of the public belief that the Organization is guided by the principles of impartiality, honesty, transparency and accountability;
  - 5) avoid any kind of patronage, mediation, support and advice that may jeopardize the mission of the Organization and the perception of its anticorruption activities;
  - 6) not make the Organization dependent on any extraneous influence by their behaviour;
  - 7) not emphasize their connection with the Organization unduly and not abuse the name of the Organization;
  - 8) avoid unnecessary promises, realize the value and importance of their words and the possible negative consequences of the promise for the Organization;
  - 9) display political reserve when performing their duties and not question the political impartiality of the Organization by their conduct;
  - 10) avoid conflict of interest situations and, in the event of such a risk, take immediate action to manage a conflict of interest;
  - 11) inform the Ethics Committee of the Organization about the cases of violation of the rules of conduct, requirements for conflict of interest situations by a member, employee or volunteer of the Organization;
  - 12) not publicize officially unpublicized materials and findings of studies owned (copyrighted) by the Organization, during their term of office and within one year thereafter; and
  - 13) not use the property provided by the Organization for personal purposes.
11. In their daily interaction with each other the members, employees and volunteers of the Organization shall:
- 1) be guided by moral norms based on the principles of lawfulness, justice, humanity and honesty;
  - 2) be tolerant and respect human dignity regardless of gender, race, colour, ethnic or social origin, genetic characteristics, language, religion, worldview, political or other views, nationality, gender, property status, birth, disability, age, personal or other social circumstances;
  - 3) be polite in interaction with each other, the beneficiaries, partners and others;
  - 4) wear proper clothing at work and adhere to the rules of good hygiene;
  - 5) rule out any kind of harassment, including sexual, physical and psychological;
  - 6) refrain from organizing or using hate speech, intimidation, threats and group pressures;
  - 7) smoke in the Organization's office only in designated areas and rule out appearing at work under the influence of alcohol;
  - 8) respect each other's privacy when dealing with personal information; and
  - 9) use only lawful and honest means to achieve the goal when performing their duties.
12. A member, employee, or volunteer of the Organization may engage in any activity not prohibited by law or occupy any position, provided that this does not interfere with the proper performance of their duties, does not discredit the Organization and does not create a conflict of interest.
13. The members, employees and volunteers of the Organization shall not use the authority and connections of the Organization for their personal purposes.
14. The involvement of the members of the Organization in various spheres, including the political arena and the sphere of political parties, public and private sectors, shall not limit the right of the Organization to express an opinion about or criticize the activities of such sectors.
15. The members, employees and volunteers of the Organization shall make sure to the extent possible that their political connections and/or activities do not affect the political impartiality of the Organization.

#### **4. MANAGEMENT OF CONFLICT OF INTEREST**

16. The Organization shall be fair, objective and impartial in the process of staffing and promotions. Close relatives and/or relatives through kinship and/or marriage of the Board members or employees may not work in the Organization jointly where their work is under the direct subordination or supervision, except for volunteer work. Close relatives and/or relatives through kinship and/or marriage of the Executive Director and Human Resources Officer may not work in the Organization jointly, except for volunteer work.
17. When purchasing goods or services, the Organization shall conduct a procurement tender, excluding procurement from a single source, in particular from the companies whose management or decision-making bodies include members or employees of the Organization.
18. The members, employees and volunteers of the organization shall rule out possible conflicts of interest, and in case of occurrence of such a situation or being unable to orient themselves, the members shall immediately apply to the Chairperson of the Ethics Committee, and the employees and volunteers shall apply to their supervisor, human resources officer and then to the Executive Director, successively. The latter, to the extent possible and depending on the situation, shall propose measures to rule out a conflict of interest situation or, if necessary, apply to the Ethics Committee for clarification or advice on the situation.
17. In the event of involvement in the process of staffing, grant award or procurement tenders, depending on the situation, they recuse themselves. In the event the Executive Director is in a conflict of interest situation, the decision is left to the Board.
19. The members, employees and volunteers of the Organization shall not directly or indirectly accept any discount, gift, grant or invitation (to dinner, cultural events, tours, etc.) that affect or are perceived to affect the performance of their duties, other than universally available gifts which are available to all members of the Organization or event participants.
20. The members of the Board of the Organization shall declare their property and non-property interests which may lead to or be perceived as a conflict of interest. The staff of the organization maintains the register of the interests of the Board members, which is updated once a year and according to the changes in the situation.
21. When hired, the employees of the organization shall declare their property and non-property interests, which may lead to or be perceived as a conflict of interest. They update the declaration according to the changes in the situation. The employees of the Organization shall inform their supervisor and the human resources officer in writing about other paid work or public activities carried out by them outside the Organization.
22. A person who is included in the elected/appointed governing bodies of the Organization, the governing bodies formed by the General Meeting of the Organization and in the staff may not be elected a member of the Board of the Organization.
23. The members of the Board of the Organization shall not be paid by the Organization, except in cases where they possess unique and advanced expert knowledge in the labour market. In the latter case, they may perform certain expert work / or provide expert services with the consent of the Board.
24. Where the governing bodies of the Organization consider an issue related to a member of the Organization or a close relative and/or a relative through kinship and/or marriage (parents, spouse, child, sibling, parents-in-law, child of the spouse, sibling of the spouse) regarding the rules of conduct or the requirements for a conflict of interest, the member in question may not participate in the discussion and the voting, recusing himself/herself.

## **5. RESPONSIBILITY**

25. Compliance with this Code shall be mandatory for the members, employees and volunteers of the Organization.
26. Oversight of compliance with the rules of conduct by the members of the Organization shall be exercised by the Ethics Committee (hereinafter referred to as “Committee”) in accordance with the Charter of the Organization and the Rules of Procedure of the Committee.
27. The Executive Director shall supervise compliance of the employees and volunteers of the Organization with the Code of Conduct and the requirements for conflict of interest situations.
28. Non-compliance with the Code of Conduct by members, employees and volunteers of the Organization shall result in disciplinary liability. Disciplinary measures in the case of members shall be established by the Charter of the Organization, the procedures for membership and the Board, and in the case of employees and volunteers, by the RA labour legislation, in accordance with the “Human Resources Procedures” and other internal legal acts.
29. The type of disciplinary liability in the case of members shall be determined by the Board, and in the case of employees and volunteers, by the Executive Director of the Organization, based on the violation, the circumstances of the violation, its severity and consequences, as well as the employee’s previous behaviour.
30. The legal relations regarding the non-observance by an employee of the organization of the requirements regulated by the RA Labour Code, as well as established by other documents regulating the labour relations, shall not be subject to examination by the Ethics Committee on grounds of violation of the rules of conduct.
31. The types of disciplinary liability can be appealed in the manner prescribed by the RA legislation.

## **6. FINAL PROVISIONS**

32. The Code of Conduct and the amendments shall be approved by the General Meeting of the Organization.
33. Comments/clarifications on the rules of conduct shall be provided by the Ethics Committee on its initiative or based on the application of an interested party.