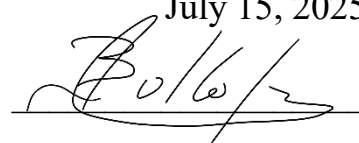


APPROVED
Executive Director
NGO «Technology of Progress»
Zadvornyy V.V.
July 15, 2025



Approved
By Order No. 4-D dated July 15, 2025

Approved
By the Decision of the Extraordinary General
Meeting No. 3-P dated July 15, 2025

POLICY COMPLIANCE CONTROL INSTRUCTION

Kyiv, 2025

1. The Policy Compliance Control Instruction (hereinafter – the Instruction) is adopted and developed by the NGO “Technologies of Progress” (hereinafter – the Organization).
2. This Instruction is developed for the purpose of establishing systematic monitoring of compliance with all internal policies of the Organization.
3. For the purposes of this Instruction, the term all internal policies of the Organization shall mean all documents adopted by the Organization to regulate internal processes, procedures, standards of ethical conduct, prevention of discrimination, ensuring inclusivity, transparency, internal control, risk management, conflict of interest, and other areas of internal governance.
4. Responsibility for organizing the policy compliance control process rests with the Executive Director of the Organization.
5. At the beginning of each calendar year, the Executive Director approves the Policy Compliance Control Plan (hereinafter – the Control Plan), which defines control methods, control measures, and responsible persons.
6. The Control Plan is developed taking into account all valid policies of the Organization and shall provide for:
 - a list of policies subject to review in the current year;
 - responsible persons for conducting assessments/reviews;
 - timelines for the implementation of each stage of control;
 - a mechanism for consolidating review results and reporting.
7. Policy compliance control may be carried out through:
 - regular analysis of the Organization’s activities;
 - periodic surveys of employees and engaged persons regarding compliance with rules and procedures;
 - verification of actual compliance with policy requirements within the Organization’s activities;
 - review of incidents, complaints, or reports of potential policy violations.
8. Based on the implementation of the Control Plan, the Executive Director prepares and presents to the General Assembly an annual Policy Compliance Report, which includes a brief description of the control measures carried out during the year, the presence or absence of identified violations, recommendations for addressing violations and improving internal processes, and a list of policies requiring update or revision.
9. In the event of identification of significant violations or systemic deficiencies, the Executive Director initiates immediate response measures, including:
 - amendments to the relevant policies;
 - additional training for employees;
 - consideration of the matter at a meeting of the governing bodies of the Organization.
10. All employees of the Organization are obliged to facilitate policy compliance control, provide necessary information in a timely manner, and participate in relevant control activities.
11. Given that this Instruction is approved in the middle of the reporting year, the Control Plan for 2025 shall be developed by the Executive Director for the period from August to December.

12. This Instruction enters into force on the date of its approval by the Executive Director of the Organization.