

APPROVED
Executive Director
NGO «Technology of Progress»
Zadvornyy V.V.
April 8, 2025



Approved
By Order No. 2-D dated April 8, 2025

Approved
By the Decision of the Extraordinary General
Meeting No. 1-P dated April 8, 2025

ANTI-CORRUPTION POLICY

Kyiv, 2025

1. Purpose of the Document

1.1 This Anti-Corruption Policy is a governing document of the NGO «Technology of Progress» (hereinafter – the «Organization»), which defines key principles and requirements aimed at preventing corruption and ensuring compliance with anti-corruption legislation by members of its governing bodies, employees, and other persons who may act on behalf of the Organization.

2. Objective of the Policy

2.1 The Policy reflects the Organization's and its leadership's commitment to high ethical standards and principles of transparent and honest conduct, as well as the Organization's efforts to improve corporate culture, follow best practices of corporate governance, and maintain a proper business reputation.

2.2 The Organization aims to:

- minimize the risk of the Organization, its governing body members and employees, regardless of their position (hereinafter collectively referred to as «Personnel»), becoming involved in corrupt activities;
- create a common understanding among Organization members, partners, donors, contractors, personnel, their management bodies, employees, and others of the Organization's zero-tolerance policy toward corruption in any form;
- establish the obligation for Organization's personnel to be aware of and comply with this Policy's principles and requirements, key norms of applicable anti-corruption legislation, and adequate anti-corruption procedures.

3. Scope and Responsibilities

3.1 All Organization's personnel must adhere to this Policy and strictly follow its principles and requirements.

3.2 The Executive Director of the Organization is responsible for organizing all activities aimed at implementing the principles and requirements of this Policy, including appointing persons responsible for developing, implementing, and monitoring anti-corruption procedures.

3.3 The principles and requirements of this Policy apply to Organization members and their representatives, as well as other persons, when such obligations are stipulated in contracts, internal documents, or derive directly from the law.

4. Anti-Corruption Legislation

4.1 The organization and all its employees are obliged to comply with the anti-corruption legislation of Ukraine, namely the Law of Ukraine «On the Principles of Anti-corruption Policy in Ukraine».

4.2 The terms «corruption offense», «corruption», and «unlawful benefit» are defined based on the aforementioned Law.

4.3 A corruption offense is an intentional act that exhibits signs of corruption, committed by a person entrusted with official duties, for which criminal, administrative, civil, or disciplinary liability is established by law.

4.4 Corruption is the use by a person of their official powers and related opportunities to obtain an unlawful benefit or to accept a promise/offer of such benefit for themselves or others; or, respectively, a promise/offer or provision of an unlawful benefit to such person or, at their request, to other individuals or legal entities with the aim of inducing that person to unlawfully use their official powers and related opportunities.

4.5 Unlawful benefit refers to money or other property, advantages, privileges, services of a material or non-material nature that are promised, offered, given, or received free of charge or at a price below the minimum market value, without legal grounds.

4.6 Money laundering is the concealment of the origin of money obtained through illegal means, typically by transfers involving foreign banks or legitimate businesses.

4.7 Terrorism financing is the provision of financial resources, services, or other material support for the benefit of a designated person or group.

5. Key Principles

5.1 Responsibility of Senior Management. The Executive Director of the Organization must establish an ethical standard of zero tolerance toward any forms and manifestations of corruption at all levels, leading by example and ensuring that all employees and contractors are familiar with the anti-corruption policy.

5.2 Periodic Risk Assessment. The Organization periodically identifies, reviews, and assesses corruption risks that are typical for its overall activities and for specific areas in particular.

5.3 Adequate Anti-Corruption Procedures. The Organization develops and implements adequate procedures to prevent corruption, which are reasonably aligned with the identified risks, and monitors compliance with them.

5.4 Counterparty Due Diligence. The Organization makes reasonable efforts to minimize the risk of business relations with counterparties who may be involved in corrupt activities, terrorism financing, or money laundering. To this end, the Organization verifies whether such counterparties have their own anti-corruption procedures or policies, their willingness to comply with the requirements of this Policy, to include anti-corruption clauses in contracts, and to provide mutual support in ethical business conduct and corruption prevention.

5.5 Donor Requirements. The Organization's obligations regarding the prevention of corruption are also directly derived from the respective signed grant agreements, which are an integral part of this Policy.

6. Gifts and Representation Expenses

6.1 Gifts that employees may give on behalf of the Organization to other individuals and organizations, or that employees may receive from others in connection with their work at the Organization, as well as representation expenses—including expenses for business hospitality and promotion of the Organization—must simultaneously meet the following five criteria:

- Be directly related to the legitimate purposes of the Organization's activities, such as project presentations or completions, successful task performance, or national holidays, commemorative dates, and anniversaries;
- Be reasonably justified, proportionate, and not considered luxury items;
- Not constitute a hidden reward for a service, action, omission, indulgence, patronage, granting of privileges, making of a specific decision, or an attempt to influence the recipient for any other unlawful or unethical purpose;
- Not pose a reputational risk to the Organization, its employees, or other individuals in the event that information about the gifts or representation expenses becomes public;
- Not contradict the principles and requirements of this Policy, other internal documents of the Organization, or applicable legislation.

6.2 Gifts in the form of money—whether cash or non-cash, and regardless of the currency—are not allowed to be given on behalf of the Organization, its employees, or its representatives to third parties.

7. Selection and Monitoring of Consultants and Experts

7.1 Given that the selection of experts and consultants for the Organization's activities is often limited, it is not always possible to conduct a competitive selection process. Therefore, the Executive Director of the Organization and project managers are responsible for the ongoing monitoring of the quality of research results (services) provided by them.

7.2 Responsible persons must respond promptly to any decline in the quality of services provided or delays in the fulfilment of contractual obligations.

7.3 The Executive Director of the Organization and project managers must continuously work on expanding the database of consultants and experts.

8. Personnel Relations

8.1 The Organization requires its employees to comply with this Policy by informing them of its key principles, requirements, and sanctions for violations, and by incorporating these obligations into the job descriptions of the Organization's personnel.

8.2 The Organization provides safe, confidential, and accessible channels for reporting to management any instances of corruption offence, corruption, or the receipt of unlawful benefits by individuals providing services in the interests of or on behalf of the Organization. Suggestions for improving anti-corruption procedures and controls, as well as inquiries from employees and third parties, may be submitted to the Organization's management.

8.3 To foster a proper level of anti-corruption culture, newly hired employees undergo an introductory training on the provisions of this Policy and related documents. Existing employees attend periodic informational seminars, either in-person or remotely.

8.4 The Organization holds discussions and provides explanations to employees regarding this anti-corruption policy and the norms of anti-corruption legislation. In this context, training is provided to employees who hold certain positions, perform high-corruption-risk functions, or are involved in specific anti-corruption procedures. The goal of this training is to ensure that each

employee acquires the techniques and skills necessary to apply the anti-corruption policy and procedures in practice.

9. Accounting and Recordkeeping

9.1 All financial transactions must be accurately, correctly, and sufficiently detailed in the Organization's accounting records, properly documented, and available for audit.

9.2 The Organization appoints employees who are responsible, in accordance with the applicable legislation of Ukraine, for the preparation and submission of complete and accurate financial reports within the deadlines established by the respective legislation.

9.3 Any distortion or falsification of the Organization's financial reports is strictly prohibited and considered fraud.

10. Authorized Body

10.1 The Executive Director of the Organization is the Organization's designated permanent body authorized to address issues related to corruption violations.

11. Reporting Concerns

11.1 Any employee or other person who has doubts about the legality or compliance of their own actions, or the actions, inactions, or proposals of other employees, contractors, or other persons interacting with the Organization with the goals, principles, and requirements of this Policy, may report this by sending a message to info.technology.progress@gmail.com, or to their immediate supervisor and/or the authorized body responsible for handling corruption-related issues. This body, if necessary, will provide recommendations and clarifications regarding the situation. If, for any reason, employees prefer not to report to their supervisor, the message should be sent to the Executive Director of the Organization.

11.2 No employee shall be subject to sanctions (including dismissal, demotion, loss of bonus, etc.) if they report an actual or suspected corrupt act, or if they refuse to commit or assist in committing a corrupt act, including cases where such behaviour causes adverse consequences for the Organization.

11.3 Any suspicion of corruption must be immediately reported to the Executive Director of the Organization for prompt measures to minimize potential threats and adverse consequences, as well as to initiate an investigation. If necessary, by decision of the Executive Director of the Organization, a group or an individual shall be appointed to conduct the investigation of corruption suspicions.

12. Audit and Control

12.1 The Organization regularly conducts external audits and/or internal reviews of its financial and economic activities, monitoring the completeness and accuracy of data reflected in the accounting records, and compliance with applicable laws and the Organization's internal regulatory documents, including the principles and requirements established by this Policy.

12.2 As part of internal control procedures, the Organization performs inspections of key activity areas, including selective checks of the legality of payments made, their economic

justification, and the appropriateness of expenses, including verification against primary accounting documents and compliance with the requirements of this Policy.

12.3 Corruption-related risks must be taken into account in all provisions and instructions that relate to the possibility of such risks.

13. Amendments

13.1 Upon identifying provisions of this Policy or related anti-corruption procedures of the Organization that are insufficiently effective, or in case of changes in legal requirements, the Executive Director of the Organization shall organize the development and implementation of an action plan to review and amend this Policy and/or the anti-corruption procedures

14. Responsibility

14.1 The Executive Director of the Organization, and employees of all structural divisions of the Organization, regardless of their position, bear responsibility as prescribed by the current legislation of Ukraine for compliance with the principles and requirements of this Policy, as well as for the actions (inaction) of their subordinates that violate these principles and requirements.

14.2 Persons found guilty of violating the requirements of this Policy may be held liable under disciplinary, administrative, civil, or criminal law on the initiative of the Organization, law enforcement agencies, or other entities, in accordance with the procedures and grounds provided by the legislation of Ukraine, the Organization's Charter, internal regulations, and employment contracts.

15. Final Provisions

15.1 This Policy comes into effect from the date of its approval by the Executive Director of the Organization.