

**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

# **REGULATIONS ON THE ETHICS COMMITTEE**

**Kyiv, 2025**

## **1. General Provisions**

1.1. The Ethics Committee of the NGO «Technology of Progress» (hereinafter – the «Ethics Committee») is established in accordance with the statutory purpose and objectives of the Organization. It is a body that provides members of the Organization’s Governing Bodies, members of the Audit Committee, other members, and employees of the Organization with consultations on ethical matters, including conflict of interest issues and the code of conduct.

## **2. Competence of the Ethics Committee**

- 2.1 The Ethics Committee is responsible for considering issues related to:
- a. The vision, values, and working principles of the NGO «Technology of Progress»;
  - b. The human resources policy of the NGO «Technology of Progress»;
  - c. The conflict of interest policy of the NGO «Technology of Progress»;
  - d. Other documents.

The Ethics Committee may interpret the content of the aforementioned documents.

- 2.2 The Ethics Committee drafts and proposes amendments to the Policy on Conflict of Interest.
- 2.3 The Ethics Committee is responsible for reviewing the NGO «Technology of Progress» Policy on Conflict of Interest and may provide recommendations to the Executive Director of the Organization regarding this document.
- 2.4 The Ethics Committee may, on its own initiative, provide recommendations to the Executive Director of the Organization concerning the content of any regulatory document of the NGO.
- 2.5 The Ethics Committee submits an annual report on its activities to the General Meeting.

## **3. Election of Members of the Ethics Committee**

- 3.1 The number and composition of the Ethics Committee are determined by the General Meeting of the Organization every two years. Candidates for the Ethics Committee are submitted for voting by the members of the Organization upon nomination by the Executive Director of the Organization.
- 3.2 Members of the Audit Committee, employees, and the Executive Director of the Organization may not be members of the Ethics Committee.
- 3.3 The Chairperson and Secretary of the Ethics Committee are elected from among its members at the first meeting of the Committee by open voting and a simple majority.

## **4. Procedure for Reviewing Submissions**

- 4.1 The Ethics Committee reviews submissions related to the issues defined in Clause 2.1 of this Policy.
- 4.2 Submissions may be made by:
- a. The Executive Director of the Organization;
  - b. A member of the NGO;
  - c. An employee of the NGO.
- 4.3 Submissions must be sent electronically to the email addresses of the Chairperson and Secretary of the Ethics Committee.
- 4.4 A submission must include:

- a. The name, role in the Organization, and contact information of the author;
- b. A clear description of the issue;
- c. Copies of relevant documents, if applicable;
- d. In case urgent review is required – justification and relevant deadlines.

4.5 Upon receipt of a submission, the Secretary of the Ethics Committee must send an acknowledgment of receipt to the author.

4.6 If the submission is made by a person not listed in Clause 4.2, or if the matters raised are not related to ethical issues defined in Section 1, it shall not be considered by the Ethics Committee. In such cases, the Chairperson of the Ethics Committee must inform the author of the submission. The Chairperson may forward such a submission to the Executive Director of the Organization.

4.7 If the submission lacks sufficient information for review, including the elements listed in Clause 4.4, the Chairperson of the Ethics Committee shall inform the author and provide 15 calendar days to submit the missing information. If the information is not provided within 15 days, the review will be terminated.

4.8 Upon receiving a valid submission, the Chairperson of the Ethics Committee shall forward it along with any attached documents to all Committee members.

4.9 The author of the submission may request confidentiality and must justify the need for it. If the Ethics Committee agrees to confidentiality, its members must avoid mentioning the author's name or any identifying information in any external communications. If the Ethics Committee denies the confidentiality request, the Chairperson must inform the author, who will be given 7 calendar days to consent to a regular review or to withdraw the submission.

4.10 The Ethics Committee appoints one of its members to study the submission and draft a recommendation, which is then circulated by the Chairperson to all members. The Chairperson sets deadlines for preparing and approving the recommendation based on the scope and complexity of the issues.

4.11 If the submission involves issues that may affect the rights or interests of third parties, the appointed Committee member must notify such parties and send them a copy of the submission. These parties have 15 days to respond or comment; failure to respond does not halt the review.

4.12 The Ethics Committee or its appointed member may request additional information from the author or any other relevant source.

4.13 Committee members may use technical means (email, video conferencing, phone, fax) for discussion and approval of the recommendation draft. This process is organized and coordinated by the Chairperson.

4.14 If a Committee member declares recusal or is recused by the Chairperson due to a real or potential conflict of interest, the submission shall be reviewed without their participation.

## **5. Recommendations of the Ethics Committee**

5.1 The Ethics Committee issues written recommendations based on the review and discussion of the draft prepared by the authorized Committee member.

5.2 Recommendations are adopted by a majority vote of the Ethics Committee members. Committee members who did not vote in favour of the adopted recommendations may present their dissenting opinions in writing.

5.3 The recommendations of the Ethics Committee are provided to the author of the submission, the person whose actions or omissions were challenged (if applicable), and are also communicated to the Executive Director of the Organization.

## **6. Final Provisions**

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