

NGO TECHNOLOGY OF PROGRESS (TOP NGO) work-place policies

NGO TECHNOLOGY OF PROGRESS (TOP NGO) was founded by **Maksym Nefodov, Hnat Zabrodskyy, Kutsenko Daria** in 2022.

From the first days of the NGO operations, key principles for the core team and invited specialists included - full compliance with all relevant laws and regulations in Ukraine, as well as transparency/accountability for all involved internal and external stakeholders (according to set out partnership/donor requirements), whilst maintaining a healthy, supportive and safe environment for the work and team's development.

Workplace policies that address the following issues in order of the following document:

1. Allegations of bullying, harassment, intimidation and misconduct.
2. Protection of personal data including that of staff, beneficiaries, and funders
3. Safeguarding of children or vulnerable adults where an organisation's activities involve regular contact with either group
4. Conflict of interest
5. Whistleblowing
6. Physical and digital security
7. Health and safety in the workplace
8. Diversity, Equity and Inclusion

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14, July 2025



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14, July 2025



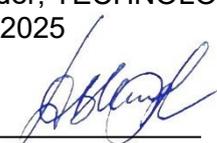
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14, July 2025



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14, July 2025



Allegations of bullying, harassment, intimidation, and misconduct:

Zero Tolerance: TOP NGO has a zero-tolerance policy for any form of bullying, harassment, intimidation, or misconduct. This includes verbal, physical, and sexual misconduct, as well as any other behavior that creates a hostile or unsafe working environment.

Reporting: All team members, external specialists and volunteers are encouraged to report any incidents of bullying, harassment, intimidation, or misconduct to their supervisor (point of contact in the team). Reports can also be made anonymously via digital channels of the TOP NGO, or via trusted team members.

Investigation: All reported incidents will be promptly investigated and dealt with in a confidential and impartial manner. The TOP NGO will take appropriate action based on the findings of the investigation, including disciplinary action, up to and including termination of employment/work assignment or volunteer service.

Support: The TOP NGO will provide support to the person who made the report, as well as to any other individuals who may have been affected by the incident. This may include counseling, trauma support, and other forms of assistance.

Communication: The TOP NGO communicates this policy to all team members, external specialists and volunteers.

Protection of personal data, including that of staff, beneficiaries, and funders:

Compliance: The TOP NGO complies with all relevant laws and regulations regarding personal data protection in Ukraine, including the framework of General Data Protection Regulation (GDPR) requirements.

Collection: The TOP NGO only collects personal data that is necessary for the performance of its activities and obtains the informed consent of the individuals concerned before collecting any personal data.

Use: TOP NGO uses personal data only for the purposes for which it was collected and will not share or disclose it to any third parties without the informed consent of the individuals concerned.

Security: The TOP NGO will implement appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, disclosure, or destruction.

Retention: The TOP NGO will retain personal data only for as long as necessary to fulfill the purposes for which it was collected and will securely delete or destroy it when it is no longer needed.

Communication: The TOP NGO communicates this policy to all team members, external specialists and volunteers.

Conflicts of interest:

Definition: A conflict of interest exists when team member's, external specialist's or volunteer's personal, financial, or business interests interfere or appear to interfere with the interests of the TOP NGO.

Disclosure: All team members, external specialists and volunteers must disclose any potential conflicts of interest to their supervisor (point of contact in the team) or during the general/core team meetings. This includes any financial or business interests that may be affected by the TOP NGOs activities or any relationships that may create a perception of a conflict of interest.

Avoidance: The TOP NGO will take steps to avoid or manage any actual or potential conflicts of interest. This may include limiting the involvement of the team members, external specialists and volunteers with conflicting interests in certain activities or decisions, or requiring them to divest in their conflicting interests.

Compliance: All team members, external specialists and volunteers must comply with this policy and any specific conflicts of interest management measures put in place by the TOP NGO.

Review: The TOP NGO will review and update this policy regularly to ensure that it remains effective in managing conflicts of interest.

Communication: The TOP NGO communicates this policy to all team members, external specialists and volunteers.

Whistleblowing:

Definition: Whistleblowing refers to the act of reporting illegal, unethical, or improper conduct by the TOP NGO or its team members, external specialists and volunteers.

Reporting: All team members, external specialists and volunteers are encouraged to report any incidents of illegal, unethical, or improper conduct to their supervisor (point of contact in the team). Reports can also be made anonymously via digital channels of the TOP NGO, or via trusted team members.

Investigation: All reported incidents will be promptly investigated and dealt with in a confidential and impartial manner. The TOP NGO will take appropriate action based on the findings of the investigation, including disciplinary action, up to and including termination of employment/work assignment or volunteer service.

Support: The TOP NGO will provide support to the person who made the report, as well as to any other individuals who may have been affected by the incident. This may include counseling and other forms of assistance.

Communication: The TOP NGO communicates this policy to all team members, external specialists and volunteers.

Physical and digital

Risk Assessment: The TOP NGO conducts regular risk assessments to identify potential physical and digital security risks, including those related to the war in Ukraine, natural disasters, theft, cyber attacks, and other incidents.

Physical Security: The TOP NGO implements appropriate physical security measures to protect its premises and assets, including alarm systems, and access controls.

Digital Security: The TOP NGO implements appropriate digital security measures to protect its IT infrastructure and data, including cloud technology backups, password protection and access control.

Incident Response: The NGO adheres to a general procedure for responding to incidents that may affect the safety of staff, property, or operations. In such situations, responsible persons are promptly informed, the incident is documented, and appropriate measures are taken to minimize the consequences. A follow-up analysis of the incident is conducted to prevent similar occurrences in the future. This approach is implemented within existing management processes without the development of separate regulations or specialized plans.

Communication: The TOP NGO communicates this policy to all team members, external specialists and volunteers.

Review: The TOP NGO will review and update this policy regularly to ensure that it remains effective in managing physical and digital security risks, especially during the ongoing war in Ukraine.

Compliance: The TOP NGO complies with all relevant laws, regulations, and standards related to health and safety in the workplace in Ukraine.

Risk Assessment: The TOP NGO conducts regular risk assessments to identify potential health and safety hazards in the workplace and take steps to eliminate or control them.

Emergency Preparedness: The NGO recognizes the importance of timely and coordinated response in the event of emergencies. To this end, the NGO incorporates basic principles of emergency preparedness into its day-to-day operations.

Communication: The TOP NGO communicates this policy to all team members, external specialists and volunteers.

Review: The TOP NGO will review and update this policy regularly to ensure that it remains effective in managing physical and digital security risks, especially during the ongoing war in Ukraine.

Diversity, equity and inclusion:

Commitment: The TOP NGO is committed to fostering a culture of diversity, equity, and inclusion in all aspects of its operations and activities.

Non-Discrimination: The TOP NGO does not discriminate on the basis of race, color, gender, sexual orientation, national origin, religion, age, disability or any other characteristic protected by law in Ukraine.

Equity: The TOP NGO works to ensure that everyone has an equal opportunity to participate and succeed, and will take steps to address any barriers that may prevent this from happening.

Inclusion: The TOP NGO actively seeks to include diverse perspectives and voices in all aspects of its operations and activities, including decision-making, program development, and team members, external specialists, and volunteers recruitment.

Communication: The TOP NGO communicates this policy to all team members, external specialists and volunteers.

Review: The TOP NGO will review and update this policy regularly to ensure that it remains effective in promoting diversity, equity, and inclusion.