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APPROVED
by the decision of the Management Board
of NGO "RUKH Global"
Minutes No. 3 dated "17" April 2026

Chairman of the Management Board
__________ Igor DUDKA

Executive Director
__________ Maryna MAKHOTA

REGULATION ON THE ANTI-CORRUPTION POLICY
OF THE NON-GOVERNMENTAL ORGANIZATION "RUKH GLOBAL"

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Responsible for maintenance: Compliance Officer of NGO "RUKH Global"
Approved by: Management Board of NGO "RUKH Global"

1. GENERAL PROVISIONS

1.1. Purpose of the Policy

1.1.1. This Regulation on the Anti-Corruption Policy (hereinafter — the "Anti-Corruption Policy", the "Policy") establishes the system of measures, rules, procedures and responsibilities in the area of prevention of and counteraction against corruption within the Non-governmental organization "RUKH Global" (hereinafter — the "Organization", "RUKH Global").

1.1.2. The Policy is founded on the principle of "zero tolerance to corruption" and confirms the unconditional commitment of the Organization to honest, transparent and integrity-based activities in all their forms, geographies and relationships.

1.1.3. The purpose of the Policy is to ensure the compliance of the Organization's activities with the requirements of Ukrainian anti-corruption legislation, international standards (primarily ISO 37001:2016) and donor requirements (EU, UN agencies, GIZ, SIDA, the U.S. Department of State and others) with respect to anti-bribery management systems.

1.2. Principles of the Policy

1.2.1. The Organization's activities in the area of corruption prevention are based on the following principles:

- zero tolerance to any manifestations of corruption, bribery, or abuse of office;
- legality — full compliance with the Constitution of Ukraine, the Law of Ukraine No. 1700-VII "On Prevention of Corruption" and other regulatory legal acts;
- transparency and accountability to members of the Organization, donors, beneficiaries and society;
- due diligence — proper verification of partners, contractors and recipients of funds;
- protection of whistleblowers from any forms of retaliation;
- inevitability of liability for violations of the Policy, regardless of the position or merits of the offender;
- proportionality of anti-corruption measures to the identified risks;
- continuous improvement of the system based on a risk-based approach.

1.3. Scope

1.3.1. This Policy applies to all persons connected with the Organization, in particular:

- members of the Management Board, the Chairman of the Management Board, members of the General Assembly, members of the Audit Commission;
- the Executive Director and other officials of the executive directorate;
- regular employees (under employment contracts);
- non-staff personnel, consultants and experts under civil-law contracts (CLC, gig-contractors);
- volunteers acting on behalf of or in the interests of the Organization;
- interns, trainees, participants of exchange programs;
- contractors and suppliers of goods and services (within the scope of their contractual obligations);
- partners (consortia, affiliated partners, grant sub-recipients);
- recipients of grants, scholarships and charitable aid provided by the Organization.

1.3.2. The requirements of the Policy shall be implemented into employment contracts, civil-law contracts, service agreements, grant agreements and memoranda of understanding through the inclusion of corresponding anti-corruption clauses (see Annex E).

2. LEGAL BASIS

2.1. Ukrainian legislation

- Constitution of Ukraine of 28 June 1996;
- Law of Ukraine No. 1700-VII "On Prevention of Corruption" of 14 October 2014 (in particular Articles 61–64, which establish requirements for anti-corruption programs of legal entities);

- Criminal Code of Ukraine, in particular:
  - Article 368 — acceptance of an offer, promise, or receipt of an undue advantage by an official;
  - Article 368-3 — bribery of an official of a legal entity of private law;
  - Article 368-4 — bribery of a person providing public services;
  - Article 369 — offer, promise or provision of an undue advantage to an official;
  - Articles 354, 364, 364-1, 365-2, 366-1, 369-2, 370 — related corruption and corruption-associated offences;
- Law of Ukraine No. 4572-VI "On Public Associations" (in the wording as of 03.09.2024);
- Law of Ukraine No. 5073-VI "On Charitable Activities and Charitable Organizations";
- Tax Code of Ukraine, Article 133.4 (requirements for non-profit organizations);
- Labor Code of Ukraine (KZpP);
- Methodological Recommendations of the National Agency for Corruption Prevention (NAZK) on anti-corruption programs of legal entities.

2.2. International standards and donor requirements

- ISO 37001:2016 Anti-bribery management systems — Requirements with guidance for use — the baseline international standard for anti-bribery management systems;
- UK Bribery Act 2010 — applied extraterritorially, covering British partners, branches, and contracts performed on the territory of the United Kingdom;
- U.S. Foreign Corrupt Practices Act (FCPA) 1977 — relevant for projects funded by the U.S. Department of State or other U.S. donors;
- EU anti-fraud framework: Regulation (EU, Euratom) 2024/2509 (Financial Regulation), Regulation (EU, Euratom) No 883/2013 concerning the European Anti-Fraud Office (OLAF), Directive (EU) 2017/1371 (PIF Directive);
- Sida's Anti-Corruption Rule (Sida Policy against corruption);
- GIZ Integrity Compliance System, GIZ Anti-Corruption Policy;
- UN Convention against Corruption (UNCAC) 2003, ratified by Ukraine;
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- INGO Accountability Charter / Accountable Now — Accountability Framework;
- Core Humanitarian Standard on Quality and Accountability.

2.3. Internal documents of the Organization

- Charter of NGO "RUKH Global" (relevant provisions regarding governing bodies, financial control, and audit);
- Conflict of Interest Prevention Policy (No. 13 in the policy register);
- Procurement Regulation;
- Financial Management Policy;
- Code of Ethics and Conduct;
- Whistleblowing Policy (Regulation on Reporting of Violations);
- Regulation on Volunteering;
- Regulation on Personal Data Protection.

3. TERMS AND DEFINITIONS

In this Policy, the following terms are used with the following meanings:

3.1. Corruption — the use by a person specified in Part 1 of Article 3 of the Law of Ukraine No. 1700-VII "On Prevention of Corruption" of the official powers granted to them, or opportunities related thereto, for the purpose of obtaining an undue advantage for themselves or for a third party, as well as the promise, offer or provision of such an advantage.

3.2. Undue advantage — monetary funds or other property, benefits, privileges, services, intangible assets, or any other advantages of an intangible or non-monetary nature which are promised, offered, provided or received without lawful grounds.

3.3. Bribe (bribery) — the offer, promise, provision or receipt of anything of value (monetary or non-monetary) for the purpose of exerting improper influence on the decision, action or inaction of a person.

3.4. Facilitation payments — small unofficial payments made to officials in order to expedite or secure the performance of ordinary, routine, non-operational actions. Such payments are prohibited by this Policy without exception, regardless of the amount.

3.5. Kickback — a concealed remuneration (in money, goods or services) provided to a person in exchange for the award of a contract, agreement, grant, tender or other advantage; constitutes a form of corruption.

3.6. Nepotism — granting preferences to relatives (family members) in recruitment, contracting, or resource allocation, contrary to objective criteria.

3.7. Patronage (cronyism) — granting preferences to friends, former colleagues, or acquaintances on the basis of personal relationships rather than merit or qualifications.

3.8. Conflict of interest — a contradiction between the private interest of a person and their official powers, which affects or may affect the objectivity or impartiality of decision-making; regulated in detail by a separate Policy.

3.9. Commercial bribery — bribery in the private sector (Article 368-3 of the Criminal Code of Ukraine).

3.10. Due diligence — the procedure for comprehensive proper verification of a partner, contractor or recipient of funds in respect of reputation, legal status, sanctions lists and corruption risks.

3.11. Whistleblower — a person who reports facts known to them, or which have become known to them, of a violation of anti-corruption legislation or of this Policy.

3.12. Anti-Corruption Authorized Person (Compliance Officer) — an official responsible for the implementation, monitoring and improvement of the Organization's anti-corruption program.

3.13. Connected person — a member of the Management Board, the Audit Commission, a regular employee, consultant, volunteer, contractor, partner, and other persons to whom this Policy applies (clause 1.3.1).

4. SCOPE OF APPLICATION

4.1. Geographical scope

4.1.1. The Policy applies to all types of activities of the Organization, regardless of the territory of their conduct, including in Ukraine, the Republic of Poland, Member States of the European Union, the United Kingdom, the United States and other countries in which the Organization implements its projects, enters into agreements or cooperates with partners.

4.1.2. Where the legislation of a host country establishes stricter requirements (for example, the UK Bribery Act 2010 for activities in the United Kingdom, or the FCPA for activities involving U.S. officials), the strictest of the applicable rules shall apply.

4.2. Personal scope

4.2.1. The provisions of the Policy are mandatory for all connected persons (clause 1.3.1) from the moment:

- for regular employees — of signing the employment contract and acknowledging the Policy with their signature;
- for members of the Management Board and the Audit Commission — of being elected to the position by the General Assembly;
- for volunteers — of signing the volunteer agreement and the Declaration on Compliance with the Anti-Corruption Policy;
- for contractors, suppliers and partners — of entering into a contract that contains the anti-corruption clause (Annex E).

4.3. Subject-matter scope

4.3.1. The Policy regulates the following areas of activity:

- management of grant funds (EU, U.S. Department of State, UN agencies, GIZ, SIDA, private donors);
- procurement of goods, works and services;
- entering into contracts with contractors and partners;
- personnel decisions (hiring, dismissal, promotion);

- allocation of the Organization's resources (including scholarships, sub-grants and charitable aid);
- interaction with public authorities, supervisory bodies and officials;
- organization of events, business meetings and business trips;
- receipt and provision of gifts and hospitality.

5. PROHIBITED PRACTICES

5.1. Connected persons are prohibited, whether directly or indirectly (through third parties, intermediaries, relatives, nominee legal entities, or by any other means), from:

- giving, offering or promising an undue advantage to any person (an official of public authorities, local self-government, law enforcement bodies, a counterparty, donor, partner or private person) for the purpose of obtaining or retaining any advantage for the Organization or for themselves personally;
- receiving, demanding or accepting offers of undue advantage in connection with the performance of their duties in the Organization;
- making facilitation payments in any amount, even where the legislation of the relevant jurisdiction permits such payments within certain limits;
- receiving or providing kickbacks in any form;
- participating in any schemes of commercial bribery (Article 368-3 of the Criminal Code of Ukraine);
- using the property and resources of the Organization for personal gain or for the benefit of third parties;
- participating in schemes of fund diversion, fictitious procurements, double financing, or false reporting to donors;
- making decisions concerning persons with whom the connected person has a kinship or personal dependency relationship, without disclosing such connection and recusing themselves;
- engaging in ghost employment or creating non-existent positions for the purpose of redistributing funds;
- artificially splitting procurements to avoid competitive procedures;
- providing false or incomplete information to auditors, inspectors, donors or supervisory bodies.

5.2. The list of prohibited practices is not exhaustive. Any action or omission bearing the signs of a corruption offence under the Law of Ukraine No. 1700-VII "On Prevention of Corruption" or under the corresponding legislation of a foreign state is prohibited.

6. PERMITTED AND REGULATED PRACTICES

6.1. Gifts and hospitality

6.1.1. Gifts and manifestations of hospitality are permitted exclusively provided that they:

- are of a symbolic, representative or branded nature (souvenirs, books, flowers, stationery, etc.);
- are consistent with customary business courtesy and are not excessive in the circumstances;
- do not create an actual or perceived obligation on the part of the recipient;
- are not given or accepted during tender procedures, inspections or investigations;
- do not consist of cash or cash equivalents (open-use gift cards, cryptocurrency, securities).

6.1.2. The following limits are established for the value of a single gift or hospitality event (calculated in UAH at the NBU exchange rate on the date of the event; for estimates in euros — in euros accordingly):

Category	**Value**	**Procedure**	**Register**
Symbolic gifts	Up to UAH 500 / up to EUR 25	Declaration not required	Not maintained
Regulated gifts	UAH 500–2,000 / EUR 25–100	Mandatory written declaration (Annex A) submitted to the direct supervisor within 5 working days	Gifts Register maintained by the Compliance Officer
Prohibited gifts	Over UAH 2,000 / EUR 100	Prohibited to accept; where refusal is not possible (protocol situations) — transferred to the Organization	Mandatory entry

6.1.3. The limits do not apply cumulatively: gifts from one and the same source are aggregated over the calendar year.

6.1.4. Any gifts or hospitality in favour of public officials (public officers of Ukraine and foreign states) are additionally regulated by Article 23 of the Law of Ukraine No. 1700-VII "On Prevention of Corruption" and the relevant annex applicable to the respective position (where available).

6.1.5. Gifts received in the course of performing an employee's duties (protocol gifts) which exceed the limits established by law shall be transferred to the Organization and recorded as its property.

6.2. Representation expenses

6.2.1. Representation expenses (working lunches, business dinners, coffee breaks at meetings with partners) are permitted subject to:

- economic justification and reasonable necessity for achieving the Organization's objectives;
- prior approval by the Executive Director or an authorized person;
- documentary support (receipts, invoices, an event report identifying participants, objectives and outcomes);
- compliance with the budget limits of the relevant grant project (where the expense is covered from grant funds);
- compliance with the donor's requirements for eligible costs.

6.2.2. Representation expenses shall not exceed on average EUR 50 per participant (excluding alcohol), or the corresponding limit established by the rules of the specific donor, whichever is lower.

6.3. Charitable activities on behalf of the Organization

6.3.1. The Organization's charitable activities are carried out in accordance with the Law of Ukraine "On Charitable Activities and Charitable Organizations" and the Charter.

6.3.2. It is categorically prohibited to make charitable contributions, donations, or to provide grants or sub-grants in exchange for entering into contracts, obtaining decisions, permits or advantages — i.e. as a concealed form of bribe.

6.3.3. All charitable projects and earmarked donations on behalf of the Organization shall be approved by the Management Board and shall undergo due diligence procedures with respect to the recipient (see Section 9).

6.4. Political contributions

6.4.1. The Organization shall not make any political contributions, donations to political parties, candidates, electoral funds, politically affiliated foundations or structures on its own behalf, from the Organization's funds or in the Organization's interests, regardless of the country.

6.4.2. The participation of individual members of the Organization in political activity in a private capacity is permitted provided that it does not create a conflict of interest and is not connected with the person's status in the Organization.

7. CONFLICT OF INTEREST

7.1. The prevention and resolution of conflicts of interest are regulated in detail by the separate Conflict of Interest Prevention Policy of NGO "RUKH Global" (Document No. 13 in the policy register). This Policy contains only the key principles as an integral component of the anti-corruption system.

7.2. Each connected person shall:

- refrain from making decisions or taking actions in circumstances of an actual or potential conflict of interest;
- notify their direct supervisor and/or the Compliance Officer of any existing or potential conflict of interest no later than the next working day from the moment the circumstances are discovered;
- take measures to resolve the conflict of interest (recusal, transfer of authority, disclosure).

7.3. Annually (by 31 January), all officials of the Organization shall submit a Conflict of Interest Declaration for the previous calendar year, in the form established by the separate Policy.

7.4. Failure to submit the declaration or the submission of inaccurate information constitutes a disciplinary violation and may serve as grounds for the application of the sanctions provided for in Section 12.

8. ANTI-CORRUPTION AUTHORIZED PERSON (COMPLIANCE OFFICER)

8.1. Appointment

8.1.1. The Anti-Corruption Authorized Person (hereinafter — the "Compliance Officer") shall be appointed by the Management Board of NGO "RUKH Global" upon proposal of the Executive Director for a term of 2 years with the possibility of re-appointment.

8.1.2. Until the appointment of a dedicated Compliance Officer, the functions of the authorized person shall be performed by a person designated by decision of the Management Board. In organizations with a small headcount, the functions may be combined with another managerial position, provided there is no conflict of interest.

8.2. Independence

8.2.1. The Compliance Officer reports directly to the Management Board and to the Chairman of the Management Board, and has the right to approach them at any time on any matter related to the anti-corruption policy.

8.2.2. The Compliance Officer may not perform functions that create a conflict of interest with their anti-corruption role (financial management, procurement, contract signing).

8.2.3. The removal of the Compliance Officer from office shall be effected exclusively by decision of the Management Board, with mandatory indication of the grounds and notification to donors (in cases where this is required by the grant agreement).

8.3. Powers and duties

8.3.1. The Compliance Officer:

- develops, updates and implements the Organization's anti-corruption program, including this Policy;
- conducts an annual corruption risk assessment in accordance with a methodology compatible with ISO 37001 and the recommendations of NAZK (Annex B);
- maintains the Gifts and Hospitality Register, the Conflict of Interest Declarations Register, and the Register of Corruption Reports;
- organizes training and instruction for personnel, volunteers and contractors (see Section 13);
- carries out due diligence of partners and contractors (see Section 9);
- receives and registers reports of suspected corruption offences;
- initiates and participates in internal investigations;
- reports to the Management Board on the state of anti-corruption activities at least once every 6 months;
- interacts with donors, auditors, NAZK (National Agency for Corruption Prevention), NABU (National Anti-Corruption Bureau of Ukraine), OLAF (European Anti-Fraud Office), and other authorized bodies on matters related to the Policy;
- ensures the protection of whistleblowers (clause 10.3).

8.4. Resources

8.4.1. The Executive Director shall provide the Compliance Officer with the necessary resources: access to documents, a training budget, technical means, and the right to engage external experts (lawyers, auditors) subject to the approval of the Management Board.

9. DUE DILIGENCE OF PARTNERS AND CONTRACTORS

9.1. Mandatory nature of verification

9.1.1. Before entering into a contract / signing a partnership agreement, the Organization shall carry out a due diligence procedure with respect to the counterparty. The depth of verification shall be proportionate to the risks (contract value, jurisdiction, field of activity, public profile of the counterparty).

9.1.2. Simplified due diligence applies to contracts with a value of up to UAH 100,000 (~EUR 2,500) and to standard suppliers of household goods/services. Standard due diligence applies to contracts from UAH 100,000 to UAH 1,000,000. Enhanced due diligence applies to contracts above UAH 1,000,000, consortium partners, and sub-recipients of grant funds.

9.2. Scope of verification

9.2.1. Standard due diligence includes verification of:

- registration data of the counterparty (EDRPOU code, register extracts, charter);
- ultimate beneficial owners (UBO);
- ownership structure and affiliated persons;
- sanctions lists: NSDC of Ukraine sanctions, EU Consolidated List of Sanctions, OFAC SDN List, UN Security Council Consolidated Sanctions List, UK HM Treasury Consolidated List;
- Politically Exposed Person (PEP) status of beneficiaries and senior managers;
- court proceedings (Unified State Register of Court Decisions);
- open sources regarding reputation (media, corruption.rise.org.ua, youcontrol.com.ua, OpenCorporates, World-Check);
- existence of a valid anti-corruption policy at the counterparty (for enhanced due diligence);
- experience and results of previous cooperation (where applicable).

9.2.2. Enhanced due diligence additionally includes:

- requesting a completed Due Diligence Questionnaire (Annex D);
- verification of financial solvency (balance sheet, profit and loss statement);
- verification of audit reports;
- interviews with the counterparty's management (where necessary).

9.3. Documentation of results

9.3.1. The results of due diligence shall be formalized in the form of a Report, which shall be retained by the Compliance Officer for the duration of the contract plus 7 years (or a longer period, where required by the donor).

9.3.2. Where red flags are identified — presence in a sanctions list, criminal proceedings of a corruption nature, a high-risk beneficiary — entering into a contract shall only be possible with the authorization of the Management Board following additional analysis, or shall be categorically rejected.

10. PROCEDURE FOR REPORTING CORRUPTION MANIFESTATIONS

10.1. Obligation to report

10.1.1. Each connected person who becomes aware of a committed, corruption-related, or potential corruption or related offence is obliged to report it.

10.1.2. Failure to submit a report where sufficient information exists shall be treated as a violation of this Policy.

10.2. Reporting channels

10.2.1. The Organization operates three independent reporting channels:

Channel	Description
Channel 1. Direct supervisor	Oral or written report to the direct supervisor or to the Executive Director. Used for cases of low complexity and in the absence of a conflict of interest.
Channel 2. Compliance Officer	Written report sent to the e-mail address compliance@rukh.global or as a paper letter. Mandatory registration in the Reports Register within 1 working day. Form — Annex C.
Channel 3. Anonymous line	Anonymous online channel on the website rukh.global/whistleblowing, or an external independent service (where available). Reports are delivered directly to the Chairman of the Management Board and to the Compliance Officer, bypassing the executive directorate.

10.2.2. Reporting to external bodies (the National Anti-Corruption Bureau of Ukraine (NABU), the National Agency for Corruption Prevention (NAZK), the Specialized Anti-Corruption Prosecutor's Office (SAPO), the Bureau of Economic Security of Ukraine (BEB), the National Police, OLAF — for EU-funded projects, SIGAR, State OIG — for U.S.-funded projects) is a right of every person and is in no way restricted by this Policy.

10.3. Whistleblower protection

10.3.1. The Organization guarantees whistleblowers protection in accordance with Section VIII of the Law of Ukraine No. 1700-VII "On Prevention of Corruption" and this Policy, in particular:

- confidentiality of the identity of the whistleblower and of the content of the report;
- prohibition of any forms of retaliation (dismissal, demotion, reduction of remuneration, termination of contract, pressure, mobbing, harassment);
- the right to legal assistance;
- the right to safety (protection of personal data, engagement of law enforcement bodies where necessary);
- remuneration in cases expressly provided for by law.

10.3.2. Anonymous reports shall be accepted and considered provided that the information set out in them concerns a specific person/fact and contains factual data that can be verified.

10.3.3. The deliberate submission of false information with the aim of retaliation or obtaining personal advantage constitutes a violation of this Policy and may entail disciplinary and legal consequences.

11. INTERNAL INVESTIGATION

11.1. Procedure

11.1.1. For each report containing sufficient indications of a possible corruption or related offence, the Compliance Officer shall, within 5 working days from the moment of registration of the report, take one of the following decisions:

- to commence an internal investigation;
- to refuse to conduct an internal investigation (on justified grounds) — with subsequent written notice to the whistleblower;
- to transfer the materials to law enforcement bodies (NABU, SAPO, BEB, the National Police, NAZK) where the indications of a crime are evident and require an immediate response.

11.1.2. The internal investigation shall be conducted by a commission composed of: the Compliance Officer (as chairperson), a representative of the Audit Commission, and an independent expert (lawyer or auditor) where necessary. The person who is the subject of the investigation shall not be included in the commission.

11.2. Principles of the investigation

- presumption of innocence — the person shall be considered innocent until a violation is established;
- confidentiality — the investigation materials shall not be disclosed, except in cases provided for by law;
- impartiality — members of the commission are obliged to declare recusal in the event of a conflict of interest;
- right to explanation — the person subject to the investigation shall be given the opportunity to provide written explanations;
- documentation — all actions, testimonies and evidence shall be recorded in the investigation file;
- time limits — the investigation shall be completed within a period of no more than 30 calendar days from the date of commencement, with the possibility of a single extension of up to 30 days by decision of the Management Board.

11.3. Outcomes

11.3.1. Following the investigation, a Conclusion shall be drawn up containing the established circumstances, the qualification of the violation, recommendations as to sanctions, and measures to prevent recurrence.

11.3.2. The Conclusion shall be submitted to the Executive Director and to the Chairman of the Management Board and, where there are indications of a criminal offence, shall be transferred to law enforcement bodies in the manner provided for by the Criminal Procedure Code of Ukraine.

11.3.3. Where the investigation concerns EU donor funds, OLAF and the national contact point (NCP) must be informed in accordance with the requirements of Regulation (EU, Euratom) 2024/2509 and the grant agreement.

12. SANCTIONS FOR VIOLATIONS

12.1. For violations of this Policy, depending on the severity of the violation, any recurrence, the damage caused and other circumstances, the following measures may be applied to the guilty persons:

- verbal or written reprimand;
- formal reprimand (dohana);
- forfeiture of bonus or premium payments;
- suspension from duties for the period of the investigation;
- dismissal from the position in accordance with the Labor Code of Ukraine;
- unilateral termination of contract (for civil-law, volunteer, partnership and contractor agreements) in the manner provided for by the contract and by this Policy;
- termination of the powers of a member of the Management Board / Audit Commission by decision of the General Assembly;
- recovery of damages caused in the manner provided for by law;
- transfer of materials to law enforcement bodies.

12.2. Partners, contractors and grant recipients that have violated the anti-corruption clause of the contract shall be subject to the sanctions provided for in the contract (termination, penalty, return of funds).

12.3. The Organization shall notify donors of identified corruption violations to the extent and within the time limits provided for in the grant agreements. For EU-funded projects — promptly upon the existence of credible evidence, in accordance with the requirements of Regulation (EU, Euratom) 2024/2509.

13. TRAINING AND INSTRUCTION

13.1. The Organization ensures regular anti-corruption training for all connected persons. The training curriculum is set out in Annex E.

13.2. Mandatory training formats:

- Induction training — mandatory for all newly engaged regular employees, consultants and volunteers within 14 calendar days from the commencement of cooperation; duration — no less than 2 academic hours; concluded by a test with a pass threshold of 80%;
- Annual refresh training — mandatory for all personnel once a year; duration — 1 academic hour; concluded by a test;
- Specific training for high-risk positions (Executive Director, Finance Manager, Grant Managers, Procurement Manager, Partnerships Manager) — once a year, in addition to the annual refresh;
- Training for contractors and partners — in the form of a written briefing and the signing of an acknowledgment of the Policy;
- Targeted training — in the event of significant changes in legislation, identification of new risks, or implementation of new high-risk projects.

13.3. Participation in training and test results shall be recorded in the Training Register maintained by the Compliance Officer.

13.4. Avoidance of training, or repeated failure to pass the test, constitutes grounds for disciplinary response.

14. MONITORING AND AUDIT

14.1. Risk assessment

14.1.1. The Compliance Officer shall conduct a Corruption Risk Assessment at least once per calendar year. The results shall be formalized as a Corruption Risk Register (Annex B) and submitted to the Management Board for consideration.

14.1.2. The risk assessment shall include identification of risks, their assessment (likelihood × impact), determination of control measures, risk owners, and deadlines for implementation of the measures.

14.2. Internal monitoring

14.2.1. The Compliance Officer shall carry out quarterly monitoring of the implementation of the Policy and prepare a report for the Executive Director. A semi-annual report shall be submitted to the Management Board.

14.2.2. The Audit Commission shall annually verify compliance with anti-corruption requirements in the conduct of financial and business activities and shall submit a report to the General Assembly in accordance with the provisions of the Charter.

14.3. External audit

14.3.1. Where necessary, the Organization shall engage an external auditor to assess the anti-corruption management system. Such audit is mandatory:

- at the request of the donor (EU — upon reaching the grant budget thresholds; GIZ/SIDA — under the terms of the agreement);
- in the event of systemic violations being identified;
- in preparation for certification to ISO 37001 (by decision of the Management Board).

14.4. Review of the Policy

14.4.1. The Policy shall be reviewed at least once every 2 years or extraordinarily in the event of:

- significant changes in the anti-corruption legislation of Ukraine, the EU, or other jurisdictions in which the Organization operates;
- changes in the requirements of key donors;
- identification of systemic shortcomings in the current version of the Policy;
- recommendations from an external audit.

14.4.2. Amendments to the Policy are approved by the Management Board. Previous versions are retained in the archive of the Organization.

15. RESPONSIBILITY

15.1. The Management Board of NGO "RUKH Global":

- approves this Policy and amendments thereto;
- appoints the Compliance Officer;
- considers the semi-annual reports of the Compliance Officer;
- takes decisions based on the outcomes of internal investigations;
- provides resources for the anti-corruption program;
- exercises "tone at the top" — demonstrates by personal example commitment to the principles of the Policy.

15.2. The Executive Director:

- organizes the implementation of the Policy in the day-to-day activities;
- ensures the signing of Declarations of Acknowledgment of the Policy by all newly engaged persons;
- controls the implementation of the Compliance Officer's recommendations;
- ensures the inclusion of anti-corruption clauses in contracts;
- adopts operational decisions to manage identified risks.

15.3. The Compliance Officer — within the powers defined in Section 8.

15.4. The Audit Commission:

- exercises control over compliance with anti-corruption requirements in financial and business activities;
- participates in internal investigations;
- reports to the General Assembly.

15.5. Each connected person:

- reads the Policy and confirms acknowledgment by signature;
- complies with the requirements of the Policy in day-to-day activities;
- undergoes training and testing;
- reports identified violations or risks;
- declares conflicts of interest and received gifts (in the cases provided for by the Policy);
- bears personal disciplinary, material, administrative and criminal liability for violations, in the manner provided for by law.

16. FINAL PROVISIONS

16.1. This Policy enters into force upon its approval by the Management Board of NGO "RUKH Global" and is mandatory for all connected persons.

16.2. The Executive Director shall ensure the acknowledgment of the Policy by all personnel and volunteers within 30 calendar days from the date of its approval, with signatures recorded in the Acknowledgment Log.

16.3. The current version of the Policy shall be published on the Organization's website (https://rukh.global) and shall be available in the shared internal document repository.

16.4. In the event of any contradiction between the provisions of this Policy and mandatory rules of the legislation of Ukraine, the EU, foreign states, or the requirements of donor agreements, the relevant rules of legislation / donor requirements shall apply.

16.5. The provisions of the Policy form an integral part of employment contracts, civil-law contracts, volunteer agreements, and contracts with contractors and partners by virtue of the inclusion of the relevant anti-corruption clauses (Annex F).

16.6. On matters not regulated by this Policy, the provisions of the Charter of NGO "RUKH Global", the Law of Ukraine No. 1700-VII "On Prevention of Corruption", other regulatory legal acts and the international standards referred to in Section 2 shall apply.

ANNEXES

ANNEX A. FORM OF DECLARATION OF GIFT / HOSPITALITY

DECLARATION on the receipt / offer of a gift or manifestation of hospitality

I, ____ (full name), holding the position of ________________________________, in the department ______________________________, hereby report the following circumstances:

Date of event / receipt	
Location	
Source (full name / organization name, position)	
Grounds / circumstances	
Description of the gift / hospitality	
Estimated value (UAH / EUR)	
Accepted / declined / transferred to the Organization	
Existence of a conflict of interest (yes / no, explanation)	
Other material circumstances	

I certify the accuracy of the information provided.

Date: "___" ______________ 202__

Signature of the declarant: ______________ / ________________________ /

Decision of the supervisor / Compliance Officer: ____

Date: "___" ______________ 202__ Signature: ______________

ANNEX B. CORRUPTION RISK REGISTER (TEMPLATE)

The Corruption Risk Register is maintained by the Compliance Officer in the following form:

No.	Risk description	Process	Likelihood (1–5)	Impact (1–5)	Control measures	Owner	Deadline
1	Kickbacks in procurement	Procurement	3	5	Competition with ≥3 bids; disclosure of affiliations; independent tender committee	Head of Procurement	Ongoing
2	Double financing of EU/USG expenses	Finance	2	5	Cost allocation matrix; quarterly reconciliation; audit	Finance Manager	Quarterly
3	Facilitation payments at customs / in public bodies	Operations	3	4	Policy, briefings, reporting channels, legal support	Operations Lead	Ongoing
4	Ghost employees (fictitious hiring)	HR / Finance	1	5	HR verification, ID-check, dual signing of contracts	HR Manager	Ongoing
5	Nepotism in hiring	HR	3	3	Conflict of interest declaration; competitive selection; recusal	HR Manager	Ongoing
6	Corruption in sub-grants	Grants	3	5	Due diligence; capacity assessment; monitoring; audit	Grants Manager	Ongoing

Risk level = Likelihood × Impact. Thresholds: 1–6 (low) / 7–14 (medium) / 15–25 (critical).

ANNEX C. FORM FOR REPORTING A CORRUPTION MANIFESTATION

REPORT

of a corruption or corruption-related offence

A report may be submitted: (1) openly — by disclosing the reporter's details; (2) confidentially — the details are processed only by the Compliance Officer; (3) anonymously — without indication of the reporter's details.

Type of report (open / confidential / anonymous)	
Full name of the whistleblower (optional)	
Contact details for communication (optional)	
Date and time of the event	
Location of the event	
Person who is the subject of the report	
Substance of the offence	
Factual circumstances and evidence	
Witnesses (if any)	
Measures already taken	
Additional documents / evidence (list)	

Date of submission: "___" _______________ 202__

Signature (for open and confidential reports): _______________

Submission channels:

- compliance@rukh.global (e-mail of the Compliance Officer);
- paper letter to the Organization's address marked "Compliance Officer, personal";
- rukh.global/whistleblowing — online form (anonymous mode);
- directly to the Chairman of the Management Board (for cases in which the report concerns the Executive Director or the Compliance Officer).

ANNEX D. DUE DILIGENCE CHECKLIST FOR PARTNER / CONTRACTOR

Item / document	Mark	Notes
1. Extract from the Unified State Register / legal entities register of the country of registration		
2. Charter / founding document		
3. Structure of ultimate beneficial owners (UBO) disclosed		
4. Sanctions list check: NSDC of Ukraine, EU, OFAC, UN, UK HM Treasury		
5. PEP status check of senior managers and beneficiaries		
6. Court proceedings (Unified State Register of Court Decisions, arbitration)		
7. Reputational check in open sources (media, YouControl, OpenCorporates, World-Check)		
8. Existence of an anti-corruption policy at the counterparty (for enhanced DD)		
9. Financial statements for the last 2 years (for enhanced DD)		
10. Audit report (for partners receiving donor funds)		
11. Completed Due Diligence Questionnaire from the counterparty		
12. Signed anti-corruption clause in place (Annex F)		
13. Red flags identified / not identified (description)		
14. Recommendation of the Compliance Officer: conclude / reject / escalate		

Performed by: ________________ (full name, position) "___" ________________ 202__ Signature: _____________

Approved by: Compliance Officer ________________ Signature: _____________

ANNEX E. TRAINING CURRICULUM

E.1. Induction training (introductory course, 2 academic hours)

- Module 1. Introduction: why corruption is a critical risk for NGOs; reputation, donors, legal consequences.
- Module 2. Legal basis: Law of Ukraine No. 1700-VII, Articles 368, 368-3, 368-4, 369 of the Criminal Code; ISO 37001; UK Bribery Act; FCPA; EU.
- Module 3. Key terms: corruption, bribe, undue advantage, facilitation payments, kickbacks, nepotism, conflict of interest.
- Module 4. RUKH Global Policy: principles, scope, prohibited and regulated practices.
- Module 5. Gifts and hospitality: limits and declaration procedures.
- Module 6. Reporting channels and whistleblower protection.
- Module 7. Sanctions for violations.
- Module 8. Testing (10 questions, 80% pass threshold).

E.2. Annual refresh training (1 academic hour)

- Review of changes in legislation and donor requirements over the past year.
- Case studies: typical corruption risk situations in RUKH Global projects.
- Updated Corruption Risk Register: key risks.
- Practical scenarios: what to do in the event of a bribe offer, pressure, or a questionable donor request.
- Testing (5 questions).

E.3. High-risk roles training

- In-depth study of due diligence procedures.
- Work with sanctions lists and PEP checks.
- Grant management: typical corruption schemes, red flags, OLAF requirements.
- Procurement: anti-competitive practices, splitting, fictitious tenders.
- Case studies from actual OLAF / USAID OIG / NABU investigations.

E.4. Partner / Contractor briefing

- Written document (2–3 pages) — extract from the Policy.
- Signing of an Acknowledgment of the Policy.
- Signing of the anti-corruption clause in the contract (Annex F).

ANNEX F. ANTI-CORRUPTION CLAUSE FOR CONTRACTS

Text of the standard anti-corruption clause for inclusion in employment contracts, civil-law contracts, procurement contracts, partnership agreements, and sub-grant agreements:

* * *

"Anti-Corruption Clause.

1. The Parties confirm that, at the time of entering into this Agreement, they are familiar with the provisions of the Law of Ukraine No. 1700-VII "On Prevention of Corruption", the Criminal Code of Ukraine (in particular Articles 368, 368-3, 368-4, 369), the requirements of ISO 37001:2016, the UK Bribery Act 2010 (where applicable), the U.S. Foreign Corrupt Practices Act (FCPA) (where applicable), Regulation (EU, Euratom) 2024/2509 (for projects funded by the EU), and the Anti-Corruption Policy of NGO "RUKH Global".

2. The Parties undertake to refrain from any actions which may be qualified as corruption or corruption-related offences, in particular: offering, promising, providing, demanding or accepting undue advantages in monetary or non-monetary form; making facilitation payments; applying kickbacks; participating in commercial bribery; or using intermediaries to circumvent these prohibitions.

3. Party 2 (Contractor / Partner) confirms that it and its ultimate beneficial owners are not listed in the sanctions lists of the National Security and Defence Council of Ukraine, the EU, OFAC, the UN, or the United Kingdom.

4. Party 2 undertakes to promptly notify Party 1 (NGO "RUKH Global") of any facts or reasonable suspicions of corruption offences connected with the performance of this Agreement, through the channels provided for in Party 1's Anti-Corruption Policy.

5. Party 2 grants Party 1 the right to conduct audits and verifications of documents related to the performance of this Agreement during its term and for 7 years after its termination.

6. A breach of the terms of this clause constitutes a material breach of the Agreement and grounds for its unilateral termination by Party 1, with full compensation for damages caused to Party 1 and the return of any funds received under the Agreement in violation of the anti-corruption requirements.

7. Party 1 has the right to inform donors, supervisory bodies and law enforcement bodies (NABU, NAZK, SAPO, BEB, OLAF, other competent bodies) of the identified violations to the extent and within the time limits provided for by law and by the grant agreements."

* * *

The signing of this clause is an integral condition for entering into the contract. Refusal of Party 2 to sign the clause constitutes grounds for not entering into the contract.