

NGO «RUKH Global»

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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 BUSINESS TRAVEL

Version	1.0
Effective date	Date of Management Board approval, 2026
Next scheduled review	April 2028 (or earlier upon changes to the legal basis or donor requirements)
Responsible for maintenance	Executive Director; Finance Manager
Approved by	Management Board of NGO "RUKH Global"



1. General provisions

1.1. This Regulation establishes the procedure for sending employees, contractors, and other persons engaged by the Non-governmental organization "RUKH Global" (hereinafter — the Organization) on business trips, and for organizing and financing such duty travel within Ukraine and abroad.

1.2. This Regulation has been developed in accordance with:

- the Statute of NGO "RUKH Global" (provisions on executive bodies and management of funds);
- the Labour Code of Ukraine;
- Resolution of the Cabinet of Ministers of Ukraine No. 98 of 02.02.2011 "On the amounts and composition of business-travel expenses";
- Instruction of the Ministry of Finance of Ukraine No. 59 of 13.03.1998 "On official business trips within Ukraine and abroad";
- the Tax Code of Ukraine (Article 170.9, Article 133.4);
- donor requirements — EU Financial Regulation (EU, Euratom) 2024/2509; 2 CFR 200.474; Creative Europe Grant Agreement Art. 6.2.D.

1.3. Scope of application:

- staff members of the Organization (employment contract);
- persons providing services under civil-law agreements (CLA / private entrepreneurs — FOP) — with respect to reimbursement of transport and accommodation;
- volunteers of the Organization (under a separate arrangement, see Section 15);
- external experts invited to participate in the Organization's projects;
- members of the Management Board — with respect to travel for representative functions.

1.4. Geographical coverage: the territory of Ukraine, European Union Member States, European countries outside the EU, and the rest of the world.

1.5. This Regulation shall be reviewed at least once every two years or whenever substantial changes occur in the legislation of Ukraine, in EU rules on travel expenses, or in the internal structure of the Organization.

2. Legal and regulatory basis

2.1. Legislation of Ukraine

- Labour Code of Ukraine, Article 121 — guarantees and compensation for business trips.
- Resolution of the Cabinet of Ministers of Ukraine No. 98 of 02.02.2011 — amounts and composition of business-travel expenses.
- Instruction of the Ministry of Finance of Ukraine No. 59 of 13.03.1998 — official business trips within Ukraine and abroad.
- Tax Code of Ukraine: Article 170.9 (expense reports, non-taxable per-diem thresholds), Article 133.4 (requirements for non-profit organizations).
- Law of Ukraine No. 996-XIV "On Accounting and Financial Reporting in Ukraine".
- Law of Ukraine No. 1700-VII "On Prevention of Corruption" (restrictions on the acceptance of gifts, declaration of expenses).

2.2. EU donor requirements

- Regulation (EU, Euratom) 2024/2509 — principles of eligible costs, reasonableness, economy, and efficiency.
- Creative Europe Grant Agreement Art. 6.2.D — travel, subsistence, and accommodation costs: real costs or unit costs (Commission per-diem rates).
- Horizon Europe MGA v5.0 — Annex 2: travel and subsistence actual costs or unit costs.
- Commission Per Diem Rates — official European Commission per-diem rates for foreign experts.

2.3. Requirements of United States donors and international agencies

- 2 CFR 200.474 — Travel costs: reasonable, necessary, subject to prior written authorization, with economy-class airfare as the default.
- ADS Chapter 303 (for reference) — approaches to grant-funded travel; for new grants, the relevant guidance is that of the U.S. Department of State / foreignassistance.gov (USAID functions transferred to the Department of State on 01.07.2025).
- UN DSA (Daily Subsistence Allowance) rates — country-level rates updated monthly by the ICSC.
- GIZ AV-GIZ, SIDA Contribution Terms — requirements as to economy and supporting documentation.

3. Definitions

In this Regulation, the following terms shall have the meanings set out below:

- Business trip — travel undertaken by an employee at the employer's instruction, for a defined period, outside the permanent place of work, in order to perform an official task.
- Per diem (добові) — a monetary allowance intended to cover expenses arising from being on a business trip (meals, minor personal expenses), paid for each day of the trip.
- Per diem / DSA (Daily Subsistence Allowance) — a daily rate for accommodation and meals established by a donor (European Commission, United Nations) for a specific country or city.
- Commission Per Diem Rates — the official European Commission per-diem and accommodation rates by country.
- Advance — a sum of money paid to the traveller before the start of the trip.
- Expense Report (Авансовий звіт) — a document by which the traveller reports the expenses incurred, accompanied by originals of supporting documents.
- Travel Request — a request for a business trip submitted before the trip begins.
- Travel Risk Assessment — an assessment of security risks for trips to higher-risk areas.
- Duty of care — the employer's obligation to take reasonable measures to protect the health, safety, and well-being of the employee during a business trip.
- Risk zone — a country or region in respect of which the Ministry of Foreign Affairs of Ukraine or the Foreign, Commonwealth & Development Office (FCDO, United Kingdom) recommends refraining from travel or applying enhanced security measures.

4. Planning of a business trip

4.1. Business trips shall be planned in accordance with the budget of the relevant project and the annual activity plan of the Organization.

4.2. The initiator of the trip (the employee or his/her manager) shall submit a Travel Request (Annex A) no later than:

- 3 working days before the start — for business trips within Ukraine;
- 10 working days before the start — for trips to EU Member States and other European countries;
- 15 working days before the start — for trips outside Europe or to risk zones.

4.3. The Travel Request shall contain: purpose, tasks, itinerary, dates, preliminary cost estimate (air/rail/hotel/per diem/other), source of funding (project/grant/budget code), name of the traveller, and contact details during the trip.

4.4. The Finance Manager shall verify that the planned expenses correspond to the project budget and to the donor's rules; the Executive Director or a designated manager shall sign off on the request.

4.5. Once the Travel Request has been approved, the accounting team shall issue a business-travel order and, upon request, shall disburse the advance (see Section 9).

5. Approval of a business trip

5.1. Levels of approval

Type of business trip	Approver	Form
Within Ukraine, up to 14 days	Line manager + Finance Manager	Travel Request + order
Abroad, up to 14 days	Executive Director	Travel Request + order
Longer than 14 days or to risk zones	Management Board (decision recorded in Minutes)	Minutes + order + Travel Risk Assessment
Business trip of the Executive Director	Chairman of the Management Board	Order / directive
Business trip of the Chairman of the Management Board	Management Board	Minutes of the Management Board

5.2. A business trip shall be deemed approved only after the order (or other administrative document) has been signed by the competent authorized person.

5.3. Any change to the dates, itinerary, or budget of a trip after approval shall require written endorsement at the same level as the original approval.

6. Class of travel and accommodation

6.1. Air travel

- Economy class — the baseline standard for all business trips of the Organization.

- Business class is permissible only in the following cases: (a) a non-stop flight longer than 7 hours; (b) explicit written authorization by the donor and the availability of corresponding budget; (c) medical grounds.
- Tickets shall be purchased at the lowest reasonable cost; any deviation in favour of a more expensive option shall require a justification in the Travel Request.
- Under 2 CFR 200.474(d), the "lowest reasonable airfare" requirement applies.

6.2. Rail travel

- Ukraine: 2nd class (coupé) for overnight trains; 2nd-category seats on daytime trains; Intercity+ — 1st class (economy-class seated tickets are not always available, so 1st class is permissible).
- EU / Europe: standard 2nd class (Standard). 1st class is permitted only with the written consent of the Executive Director, or where the 1st-class fare is lower than the 2nd-class fare at the time of purchase.
- Rail travel shall be preferred for distances of up to 500 km (see Section 16 "Green Travel").

6.3. Hotel / accommodation

6.3.1. Country-level caps shall be determined by reference to one of the following sources, with the lower value applied for donor-funded expenditure:

- Resolution of the Cabinet of Ministers of Ukraine No. 98 (Annexes 1 and 2) — for state-budget and internal funds;
- Commission Per Diem Rates — the current European Commission schedule;
- UN DSA rates (ICSC) — for projects with UN funding.

6.3.2. Hotel category — 3 stars or equivalent; 4 stars only where justified by business necessity (accommodation at the venue of the event, security considerations) and within the applicable DSA cap.

6.3.3. The use of corporate or group rates and of platforms (Booking.com, Hotels.com, Travelport) with free-cancellation terms is recommended.

6.4. Car rental

- Class — economy or compact.
- Rental is permitted where justified by the absence of public transport, the need to transport equipment, or travel between distant locations.
- Mandatory insurance: CDW + TP (third-party liability).
- Fuel expenses are reimbursed on the basis of actual receipts; toll roads and parking are likewise reimbursed on an actual-cost basis.

6.5. Urban transport

- Taxi — on an actual-cost basis (receipts / screenshots of ride-hailing apps).
- Public transport — recommended as the priority in EU cities.
- Use of a personal car shall be reimbursed on a per-kilometre basis in accordance with CMU No. 98 and subject to the prior consent of the Finance Manager.

7. Per diem

7.1. Ukraine

- The amount of per diem within Ukraine shall be paid in accordance with CMU Resolution No. 98 of 02.02.2011 (as in force on the date of the trip).
- As of the date of approval of this Regulation — in accordance with the current wording of the Resolution (updated in Annex D).
- The non-taxable threshold is 0.1 of the minimum wage per day (Article 170.9.1 of the Tax Code of Ukraine).

7.2. Business trips abroad

- The basic rate is established in accordance with Annex 1 to CMU Resolution No. 98 (amount in US dollars by country).
- For donor-provided funds, the "lower of" principle applies: the lower of the two rates — CMU No. 98 or Commission Per Diem / UN DSA — is used.
- Where the host party provides meals, per diem is paid at a reduced rate in accordance with Ministry of Finance Instruction No. 59: breakfast minus 20%, lunch minus 40%, dinner minus 40% (aggregate reduction of up to 80%).

- For Creative Europe projects, unit costs under Grant Agreement Art. 6.2.D apply, where the budget is built on that model.

7.3. Procedure for payment of per diem

- The day of departure and the day of return are paid in full (Instruction No. 59, paragraph 4).
- Per diem for a "zero" day (where the trip starts and ends on the same calendar day) is payable under the rules of CMU No. 98.
- Per diem is not paid if the host party covers 100% of meals and accommodation (in that case, only unplanned expenses are reimbursed).

8. Reimbursement of expenses

8.1. The following categories of expenses are reimbursable (eligibility — under Ministry of Finance Instruction No. 59, CMU No. 98, 2 CFR 200.474, and EU FR 2024/2509):

- travel to the destination and return travel;
- accommodation (hotel, hostel, apartments);
- per diem;
- visa fees, consular fees, mandatory medical insurance;
- baggage charges (within reasonable limits — up to 23 kg for the main piece plus hand luggage);
- taxi / transfer to and from the airport or railway station;
- work-related communications (roaming, SIM cards, local calls made for work purposes);
- Wi-Fi during the performance of work duties (where necessary);
- conference fees, where they are not included in the grant budget as a separate line item;
- bank transfer fees incurred when paying out or returning advances in foreign currency.

8.2. The following are not reimbursed:

- alcohol, tobacco products, and entertainment;
- fines (parking, traffic violations) and damages for losses caused through the traveller's fault;
- mini-bar, pay-TV, spa / fitness services;
- expenses of relatives or accompanying persons (see Section 13);
- expenses exceeding the established caps without written justification.

8.3. Mandatory supporting documents:

- originals of fiscal receipts, invoices, boarding passes, rail tickets;
- electronic receipts in PDF format (for online bookings) together with the card statement;
- for foreign-currency transactions — the NBU exchange rate on the date of the expense or the actual bank conversion rate.

9. Advance and settlement

9.1. At the traveller's request, the Organization shall pay an advance of up to 80% of the pre-approved cost estimate.

9.2. The advance may be paid:

- by cashless transfer to a bank card (the preferred method);
- in the currency of the destination country (for foreign trips) — where technically feasible;
- in Ukrainian hryvnia, with subsequent conversion by the traveller.

9.3. The advance shall be paid no later than 3 working days before the start of the trip.

9.4. Settlement after the trip:

- The Expense Report is to be submitted by the traveller within no more than 3 working days after return (Article 170.9.2 of the Tax Code of Ukraine; Instruction No. 59, paragraphs 11 and 17).
- Any unused balance of the advance is returned together with the report.
- Where actual expenses exceed the advance, the Organization shall reimburse the difference within 5 working days of approval of the report.
- Failure to return an unused advance on time is grounds for withholding the amount from salary (Article 127 of the Labour Code of Ukraine, subject to the employee's consent) or for the application of tax penalties under the Tax Code of Ukraine.

10. Expense Report

10.1. The Expense Report form is set out in Annex B.

10.2. Mandatory fields of the report:

- full name and position of the traveller, code / number of the project;
- purpose, tasks, and a brief description of the results achieved;
- itinerary (city of departure — city of destination — city of return);
- dates of departure and return, number of days;
- breakdown of expenses by category: travel, accommodation, per diem, other;
- amount of advance, amount of actual expenses, balance / additional payment;
- attachments — a list of supporting documents, numbered;
- signature of the traveller; signature of the project manager; signature of the Finance Manager / accountant.

10.3. The report is checked by the accounting team within 3 working days. Where discrepancies are identified, the traveller shall receive a request for correction.

11. Traveller safety (Duty of Care)

11.1. Travel Risk Assessment

- For trips to risk zones, a Travel Risk Assessment (Annex C) is mandatory.
- Sources of risk assessment: recommendations of the Ministry of Foreign Affairs of Ukraine (mfa.gov.ua), FCDO UK travel advice (gov.uk/foreign-travel-advice), U.S. State Department Travel Advisories.
- The assessment outcome is endorsed by the Executive Director; for High/Extreme levels — by the Management Board.

11.2. Insurance

- Mandatory international medical insurance — minimum cover of EUR 30,000 (for the Schengen area) or equivalent for other regions; for risk zones — from EUR 100,000.
- Repatriation coverage — mandatory for all foreign business trips.
- Trip cancellation / interruption insurance — recommended for trips with prepayments in excess of EUR 500.
- Insurance premiums are included in the trip budget and reimbursed by the Organization (Annex F).

11.3. Communications and check-in

- The traveller shall inform the coordinator or project manager of arrival at the destination, with daily check-in in risk zones.
- Emergency contacts are provided to the traveller in writing (Annex E).
- Activation of roaming or a local SIM is at the Organization's expense (see clause 8.1).

11.4. Duty of Care

- The Organization has a duty to ensure reasonable safety measures: medical insurance, briefing, access to 24/7 contacts.
- In the event of an emergency (injury, hospitalization, detention, loss of documents), an emergency-response procedure applies: the traveller shall immediately notify the Executive Director and the consular office of Ukraine in the location concerned.

12. Combination with personal travel

12.1. Combination of an official business trip with personal travel ("bleisure") is permitted only with the prior written consent of the Executive Director.

12.2. Rules:

- the personal portion of the trip (additional days) is not reimbursed and is not included in the work-time record;
- if extending the stay reduces the overall cost of the air ticket, reimbursement of the baseline ticket cost is permissible;
- if the extension increases the cost, only the work-related portion is compensated; the difference is borne by the traveller;
- any change of dates or addition of extra days is documented by an appropriate letter / request prior to the trip.

13. Accompanying persons (guests, family)

13.1. The Organization does NOT reimburse the expenses of accompanying persons (spouse, children, guests, friends).

13.2. The traveller shall ensure that the documents submitted for reimbursement (hotel, tickets) reflect only the traveller's own share of the accommodation / transport cost.

13.3. Where the hotel charges an additional fee for a second occupant, only the single-occupancy rate (single rate) is reimbursed.

14. Hospitality expenses

14.1. Hospitality expenses are expenses on official lunches or dinners with partners, donors, and beneficiaries within the framework of project activities.

14.2. Caps:

- up to EUR 40 per person for a lunch; up to EUR 60 per person for a dinner — for EU countries;
- up to UAH 800 per person for a lunch; up to UAH 1,200 per person for a dinner — in Ukraine;
- alcoholic drinks (except a modest glass of wine or beer with dinner) are NOT reimbursed;
- expenses above the caps require prior written consent of the Executive Director.

14.3. Mandatory documentation: list of participants, their organization and role, purpose of the meeting, and supporting receipt.

14.4. 2 CFR 200.438 restricts entertainment costs — they are unallowable for U.S. grants; compliance with the relevant donor's rules is verified by the Finance Manager.

15. Business trips of volunteers

15.1. For volunteers of the Organization, a separate travel-reimbursement regime applies:

- volunteers are reimbursed for travel, accommodation, and meals (on a per-diem basis or in the form of a travel grant);
- per diem in the classical sense (as compensation under Article 121 of the Labour Code of Ukraine) is not paid to volunteers;
- instead of per diem, a travel grant / subsistence allowance may be paid within the limits of the donor's rules (Creative Europe: unit costs; Erasmus+: individual support);
- the volunteer shall sign a Volunteer Agreement and an Acknowledgement of Travel Rules before the trip;
- insurance and Duty of Care apply to volunteers in full.

15.2. Limits on amounts are set in accordance with the Law of Ukraine No. 3236-VI "On Volunteer Activity" and the requirements of the specific donor.

16. Green Travel policy

16.1. The Organization supports the principles of the European Green Deal and the Creative Europe "Green Strategy".

16.2. Rules of green travel:

- for distances of up to 500 km, preference is given to rail travel (air travel is permitted only where rail is unavailable or requires more than 8 hours);
- direct flights are preferred over flights with long layovers (lower carbon footprint);
- carbon offset is recommended for flights longer than 1,500 km through certified providers (Gold Standard, Verra);
- for Creative Europe projects — CO2 footprint reporting in the final project report (in the form set by EACEA).

16.3. The Finance Manager shall include carbon-offset expenditure in the project budget where the donor-funded budget includes a corresponding line item.

17. Data protection during business travel

- Laptops and smartphones containing work-related information shall be equipped with full-disk encryption (BitLocker / FileVault).
- Multi-factor authentication (MFA) is mandatory for all work accounts, in particular when accessing them from abroad.
- Use of the corporate VPN is mandatory when working on open, hotel, or cafe Wi-Fi networks.
- Leaving equipment in checked airport baggage is prohibited; a laptop shall be carried in hand luggage only.
- Personal data of beneficiaries and partners shall not be stored on the device when crossing the border unless this has been expressly agreed with the Organization's Data Protection Officer.
- In the event of loss or theft of a device — immediate notification of the IT team and the DPO (no later than 24 hours).

18. Responsibility

18.1. The traveller is responsible for:

- the accuracy of the data submitted in the Travel Request and the Expense Report;
- the safekeeping of the advance, supporting documents, and work equipment;
- compliance with safety rules and Duty of Care;
- timely return of any unused funds.

18.2. The Executive Director and project managers are responsible for:

- the appropriateness of approving the trip and its alignment with the project's objectives;
- compliance with the budget and with the donor's rules;
- ensuring that insurance and safety measures are in place.

18.3. The Finance Manager / accountant is responsible for:

- verification of the Expense Report for eligibility and donor-rules compliance;
- correct accounting treatment of the transactions;
- timely payment of advances and additional amounts.

18.4. A breach of this Regulation may be grounds for disciplinary measures under the Labour Code of Ukraine, up to and including termination of the employment contract for a gross or repeated breach.

19. Final provisions

19.1. This Regulation enters into force on the date of its approval by the Management Board of NGO "RUKH Global".

19.2. Amendments and additions to this Regulation shall be made by a decision of the Management Board.

19.3. This Regulation shall be reviewed at least once every two years or in the event of substantial changes in the legislation of Ukraine, in donor regulations, or in the structure of the Organization.

19.4. Oversight of compliance with this Regulation is entrusted to the Executive Director.

19.5. This Regulation is aligned with the Financial Management Policy, the Procurement Policy, the Anti-Corruption Policy, the Human Resources Policy, the IT and Information Security Policy, and the Personal Data Protection Policy.

Annex A. Travel Request Form

Field	Value
Full name of the traveller	
Position	
Project / budget code	
Purpose of the business trip	
Brief description of tasks	
Destination city / cities	
Date of departure	
Date of return	
Number of days	
Mode of transport (air / rail / road)	
Class of travel	
Hotel / category	
Estimated budget (EUR / UAH)	
Source of funding	
Advance requested (yes/no, amount)	
Insurance (medical cover)	
Contact details during travel	
Signature of the traveller / date	
Signature of the manager / date	
Signature of the Executive Director / date	

Annex B. Expense Report Form

Part 1. General information

Field	Value
Full name	
Project / code	
Business-travel order No.	
Itinerary	
Dates (from — to)	
Amount of advance received	
Currency	

Part 2. Breakdown of expenses

No.	Date	Category	Amount (currency)	Rate / UAH	Supporting document
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Part 3. Summary

Field	Value
Total expenses (UAH)	
Advance (UAH)	
Balance to be returned / additional payment	
Signature of the traveller / date	
Signature of the accountant / date	
Signature of the Executive Director / date	

Annex C. Travel Risk Assessment Checklist

- Is the country / region on the list of recommendations of the Ministry of Foreign Affairs of Ukraine (mfa.gov.ua)?
- FCDO UK travel advice: green / yellow / amber / red level?
- U.S. State Department Travel Advisory Level (1–4)?
- Is martial law, a state of emergency, or a curfew in force?
- Epidemiological requirements (vaccinations, PCR, quarantine)?
- Presence of a consular office of Ukraine in the destination region?
- Is medical insurance with the required cover in place?
- Is repatriation insurance included?
- 24/7 contacts: Executive Director, local partner, consulate — handed over to the traveller?
- Check-in plan (frequency, channel, contact person on the RUKH side)?
- Evacuation plan (overland routes, nearest safe airports)?
- Are cybersecurity measures (VPN, encryption, MFA) activated?
- Cash reserve available for emergencies?

Overall risk level (Low / Medium / High / Extreme): _____

Decision: _____ authorize / _____ postpone / _____ cancel

Signature of the traveller / date: _____

Signature of the Executive Director / date: _____

Signature of the Chairman of the Management Board (for High / Extreme) / date: _____

Annex D. Indicative per-diem and accommodation rates

The table below is for guidance only. Up-to-date rates shall be verified before each business trip against the official sources: CMU No. 98 (Annexes 1 and 2), Commission Per Diem Rates (ec.europa.eu), UN DSA (icsc.un.org).

Country	CMU No. 98 per diem, USD/day	Commission per diem, EUR/day	Hotel ceiling (Commission), EUR/night
Ukraine	60 UAH (within Ukraine)*	—	—
Poland	50	95	159
Germany	60	115	179
France	62	130	245
Belgium	65	120	209
Netherlands	60	120	189
Italy	55	115	175
Spain	50	105	175
Austria	60	110	165
Czech Republic	50	85	155
Sweden	55	115	195

* Within Ukraine, per diem is set by CMU No. 98 in Ukrainian hryvnia; the rate is to be verified as at the date of the business trip.

The values in the columns "Commission per diem" and "Hotel ceiling" are indicative as of April 2026; they shall be updated in accordance with the current EC per-diem rates.

Annex E. Emergency contacts

Contact	Details
Executive Director (Maryna Makhota)	tel.: +380501080980 · email: mm@rukhh.global
Chairman of the Management Board (IGOR DUDKA)	tel.: +380503562043
Finance Manager	tel.: _____ · email: _____
DPO / IT Security	email: _____
Insurance company (24/7)	policy No.: _____ · asst. line: _____
Embassy / consulate of Ukraine	verify by location (mfa.gov.ua)
Emergency services, EU	112
Emergency services, Ukraine	101 / 102 / 103 / 112
FCDO Travel Advice	https://www.gov.uk/foreign-travel-advice
Ministry of Foreign Affairs of Ukraine	https://mfa.gov.ua

Annex F. Travel Insurance Requirements

Minimum policy requirements for business trips of NGO "RUKH Global":

- Medical expenses: EUR 30,000 for the Schengen area; EUR 100,000+ for countries outside the EU; EUR 250,000 for risk zones.
- Repatriation (medical repatriation, transportation of remains): mandatory, without additional conditions.
- Emergency dental: at least EUR 500.
- Accidental death & disability: at least EUR 15,000.
- Baggage loss / delay: at least EUR 500.
- Trip cancellation / interruption: covering the prepaid project costs.
- 24/7 assistance hotline included in the policy.
- Coverage of COVID-19-related risks or analogous pandemics (where available).
- For risk zones — a war & terrorism clause (an active-war exclusion shall be expressly specified).

Accredited insurance companies (for reference): TAS, Uniq, Inter Assistance, ARX (Ukrainian insurers), Allianz Travel, Europ Assistance. The list is reviewed annually by the Finance Manager.

