NGO «RUKH Global»

hello@rukh.global
www.rukh.global

Company ID: 46294025
Legal address: Ukraine, 08290,
Kyiv Region, Bucha District,
Hostomel, 12A Patriotiv St.

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

ГРОМАДСЬКА ОРГАНІЗАЦІЯ "РУХ ГЛОБАЛ" * Ідентифікаційний код 46294025 * RUKH GLOBAL

Chairman of the Management Board
_______________ Igor DUDKA

Executive Director
_______________ Maryna MAKHOTA

REGULATION

on the Inventory of Assets and Liabilities

of Non-governmental organization "RUKH Global"

Version	1.0
Effective date	"17" April 2026
Next scheduled review	April 2028 (or upon change of legal basis / donor requirements)
Document owner	Executive Director; Accounting function
Approved by	Management Board of NGO "RUKH Global"

I. GENERAL PROVISIONS

1.1. Purpose and Scope

1.1.1. This Regulation on the Inventory of Assets and Liabilities of the Non-governmental organization "RUKH Global" (hereinafter – the Regulation, the Organization) establishes a uniform procedure for organizing, conducting, and documenting the inventory (physical count) of assets, liabilities, targeted financing, and other accounting objects of the Organization, including assets procured with funds from grants of the European Union, the U.S. Department of State, UN agencies, and other donors.

1.1.2. The purpose of this Regulation is:

- to ensure the reliability of accounting data and financial statements of the Organization in accordance with Law of Ukraine No. 996-XIV "On Accounting and Financial Reporting in Ukraine";
- to verify the existence, condition, and safekeeping of the Organization's assets, including those procured with donor funds;
- to prevent abuse, fraud, theft, and other violations in the area of asset accounting;
- to identify, in a timely manner, obsolete, damaged, unusable assets and assets that do not meet recognition criteria;
- to ensure compliance with the requirements of key donors (EU Financial Regulation 2024/2509; 2 CFR 200.313 Property records; UN Partner Portal Due Diligence; GIZ/SIDA Partner Capacity Assessment);
- to properly discharge grant agreement obligations regarding registers of project-funded assets, their tagging, use, and disposal.

1.1.3. This Regulation is mandatory for all employees, volunteers, contractors, and members of the Management Board who have access to the Organization's assets or are responsible for their accounting, in particular materially liable persons (hereinafter – MLPs), members of inventory commissions, project managers, and the Accounting function.

1.1.4. This Regulation has been developed pursuant to Clause 5.5.2.3 of the Charter of NGO "RUKH Global", under which the Head of the Organization organizes the maintenance of accounting records and reporting, and Clause 5.6.2 of the Charter concerning the powers of the Executive Director.

1.2. Legal and Normative Framework

This Regulation has been developed on the basis of the following legal acts and standards:

Ukrainian legislation:

- Law of Ukraine No. 996-XIV of 16.07.1999 "On Accounting and Financial Reporting in Ukraine", Article 10 (inventory of assets and liabilities);
- Order of the Ministry of Finance of Ukraine No. 879 of 02.09.2014 "On Approval of the Regulation on Inventory of Assets and Liabilities" (registered with the Ministry of Justice on 30.10.2014 under No. 1365/26142) – the principal subordinate act on inventory matters;
- Order of the Ministry of Finance of Ukraine No. 88 of 24.05.1995 "On Approval of the Regulation on the Documentary Support of Accounting Records";
- Tax Code of Ukraine, Article 133.4 (requirements for non-profit organizations);
- National Accounting Regulations (Standards), in particular NAS 7 "Fixed Assets", NAS 8 "Intangible Assets", NAS 9 "Inventories", NAS 10 "Accounts Receivable";
- Law of Ukraine No. 1700-VII "On Prevention of Corruption";
- Law of Ukraine No. 4572-VI "On Public Associations" of 22.03.2012 (in the wording as of 03.09.2024).

Donor requirements and international standards:

- Regulation (EU, Euratom) 2024/2509 of 23.09.2024 on the financial rules applicable to the general budget of the Union (effective from 30.09.2024) – rules for accounting of assets procured with EU funds;
- 2 CFR 200.313 "Property standards – Equipment" (revision of 22.04.2024, effective from 01.10.2024) – property records requirements, physical inventory at least once every two years, mandatory tagging, and rules for disposal of equipment exceeding USD 10,000;
- 2 CFR 200.314 "Supplies" (2024 revision) – accounting for supplies in excess of USD 10,000 as of the project closeout date;

- Horizon Europe General Model Grant Agreement v5.0 (2024) – requirements for recording fixed assets procured under a project;
- Creative Europe Guidelines 2025 – EU Visibility Requirements for tagging of equipment and materials;
- UN Partner Portal Due Diligence – asset register requirements for partnership with UNICEF, UNHCR, WFP, and other UN agencies;
- GIZ AV-GIZ (General Terms and Conditions) and SIDA Contribution Regulations – reporting requirements for procured assets;
- Core Humanitarian Standard on Quality and Accountability, Commitment 9 (effective management of resources).

1.3. Definitions and Terms

For the purposes of this Regulation, the following terms are used:

Term	Definition
Asset	A resource controlled by the Organization as a result of past events, the use of which is expected to result in economic benefits or the achievement of statutory objectives in the future.
Fixed assets (FA)	Tangible assets with an expected useful life exceeding 12 months and a unit value exceeding UAH 20,000 (threshold per Article 14.1.138 of the Tax Code of Ukraine). Recorded on GL account 10.
Low-value non-current tangible assets (LVNTA)	Non-current assets with a useful life exceeding 12 months and a unit value up to UAH 20,000 (GL account 112). May be accounted for by the group method.
Intangible assets	Assets without physical form (software licences, trademarks, copyrights) that have a monetary measurement and a useful life exceeding one year.
Inventories (supplies)	Tangible valuables intended for use in statutory activities or for transfer to beneficiaries within a single operating cycle.
Donor-funded (project) assets	Assets procured wholly or partly with donor grant funds. Subject to separate accounting, tagging, and specific disposal rules under the respective Grant Agreement.
Donor-restricted asset	An asset restricted by the terms of a donor agreement as to its intended use; may not be used outside the project without the donor's written consent.
Materially liable person (MLP)	An employee of the Organization on whom personal material liability has been placed for the safekeeping of assets under a full material liability contract (Article 135-1 of the Labour Code of Ukraine).
Inventory (physical count)	A set of actions to establish the actual existence of assets and liabilities, their condition, their reconciliation with accounting data, and the documentation of identified discrepancies.
Tagging	The affixing to a fixed-asset item of a unique inventory number and, for project-funded assets, of an additional marker (donor logo, project identifier, funding-source statement).
Write-off	The procedure for removing an asset from the balance sheet due to physical or functional wear, loss, damage, transfer, or the expiry of its useful life.
Inventory commission	A collegial body established by order of the Head of the Organization that conducts the physical count and documents its results.
Fixed Asset Register	The register of fixed assets – an internal accounting document containing all mandatory fields required by 2 CFR 200.313 and EU FR 2024/2509.

II. OBJECTS OF INVENTORY

2.1. Scope of Objects Subject to Inventory

2.1.1. All assets and liabilities of the Organization, regardless of their location, shall be subject to inventory, namely:

- fixed assets (FA) – furniture, office and presentation equipment, vehicles (if any), professional equipment with a unit value exceeding UAH 20,000;

- low-value non-current tangible assets (LVNTA) – laptops, smartphones, tablets, peripheral equipment, small tools with a unit value up to UAH 20,000;
- intangible assets – software licences, cloud subscriptions accounted for as capitalised assets, intellectual property objects, brands, trademarks;
- inventories – office supplies, handout materials, souvenir and promo products bearing donor visibility, consumables;
- tangible valuables held in safekeeping, in transit, or in use outside the office (per MLP);
- cash on hand and in bank accounts, including accounts in multiple currencies (UAH, EUR, USD, PLN);
- accounts receivable and payable, including those with donors and contractors;
- targeted financing balances (EU and other donor grants) by project;
- liabilities under grant agreements and repayable financial assistance;
- equity of the Organization (founders' contributions, reserves, retained income);
- strict-accountability forms (if any);
- assets accounted for on off-balance-sheet accounts (leased, temporarily transferred, contingent assets and liabilities).

2.2. Specifics of Accounting for Project Assets

2.2.1. Assets procured with donor grant funds shall be separately identified in the Fixed Asset Register with the following attributes:

- source of funding (donor name, Grant Agreement number and date);
- funding share (if co-financed from other sources);
- terms of use and disposal (disposal clause of the Grant Agreement);
- expiry date of donor restrictions (restriction period).

2.2.2. In accordance with 2 CFR 200.313(d), all equipment items with an acquisition cost exceeding USD 10,000, procured with U.S. federal funds, shall be tagged separately with a label indicating the programme/project, inventory number, and the statement "Property of [Donor] – for [Project Title]".

2.2.3. For assets procured with EU funds, EU Visibility Requirements shall apply: tagging with the EU emblem and the statement "Funded by the European Union" in accordance with the Communication and Visibility Manual for EU External Actions.

III. TYPES OF INVENTORY

3.1. Classification of Inventories

3.1.1. The following types of inventory are conducted in the Organization:

Type	Frequency / Trigger	Objects and particulars
Scheduled full (annual)	Annually, by 31 December (as at the balance-sheet date)	All assets and liabilities. Mandatory prior to preparation of annual financial statements under Article 10 of Law No. 996-XIV.
Scheduled partial	Quarterly or on a scheduled basis	Cash – monthly; settlements with debtors/creditors – quarterly; IT equipment – annually.
Project (reporting)	Prior to submission of interim/final project report; at project closeout	All assets procured under the project. MANDATORY for EU, U.S. Department of State, UN projects. Documented by a separate act attached to the donor report.
Unscheduled upon change of MLP	On the day of handover of duties	Assets within the scope of a specific MLP. Results documented by a handover act.
Unscheduled emergency	Following theft, fire, technological accident, natural disaster – on the next day after the event ends	Scope defined by order of the Head of the Organization. Cooperation with law-enforcement and the insurer is mandatory.
Unscheduled by decision of governing bodies	By decision of the Management Board; at the request of a donor, auditor, or regulator	Scope and deadlines set in the respective decision/request, but not earlier than the day of its receipt.

Spot (sudden)	At the initiative of the Head of the Organization or the Executive Director	Selected groups of assets; an instrument of current control and anti-corruption procedures.

3.2. Deadlines for the Annual Inventory

3.2.1. In accordance with Section I of Regulation No. 879, the inventory preceding the preparation of annual financial statements shall be carried out within the following timeframes:

- within three months prior to the balance-sheet date – for non-current assets (FA, LVNTA, intangible assets), inventories, accounts receivable and payable, liabilities, deferred expenses and deferred income;
- within two months prior to the balance-sheet date – for construction-in-progress, financial investments, cash, and targeted-financing balances;
- prior to temporary disposal from the Organization – for items of FA that will be outside the Organization on the inventory date.

3.2.2. Inventory of premises and leased facilities may be performed once every three years pursuant to Clause 10 of Section I of Regulation No. 879.

IV. INVENTORY COMMISSION

4.1. Standing Inventory Commission

4.1.1. For the purpose of carrying out inventories, the Head of the Organization shall, by order, establish a standing Inventory Commission (hereinafter – the Commission) for a term of one calendar year.

4.1.2. Composition of the Commission:

- Chair of the Commission – the chief accountant or the person performing the duties of accountant (in the case of outsourcing – the Executive Director or an employee designated by them);
- Deputy Chair of the Commission;
- at least three members of the Commission from among permanent employees who possess the knowledge and experience to identify the objects of inventory;
- Secretary of the Commission (without a vote in asset counting).

4.1.3. The total number of members of the Commission shall be at least five persons, including the Chair.

4.1.4. The following persons may be included in the Commission:

- representatives of the contractor performing accounting on a contractual basis (where accounting is outsourced);
- an external auditor (by decision of the Management Board);
- representatives of the donor (for project inventories).

4.2. Working Inventory Commissions

4.2.1. For large-scale or geographically distributed inventories (office in Ukraine; Kraków branch; warehouse at a partner), working inventory commissions may be established by order of the Head of the Organization.

4.2.2. Working commissions report to the Chair of the standing Commission and submit inventory materials to the Chair for consolidation.

4.3. Requirements for Members of the Commission

4.3.1. Principle of independence: materially liable persons SHALL NOT be members of the Inventory Commission with respect to assets for which they bear responsibility.

4.3.2. Members of the Commission shall:

- have no conflict of interest with respect to the objects of inventory (and shall submit a declaration in accordance with the Conflict of Interest Policy);
- adhere to the principles of integrity, impartiality, and confidentiality;
- ensure the completeness, accuracy, and timeliness of entries in inventory sheets;
- not disclose information on inventory results prior to their official approval.

4.3.3. The Chair of the Commission bears personal responsibility for compliance with the rules of conducting the inventory and for the correctness and timeliness of documenting the materials.

4.4. RACI Matrix

Key: R – Responsible (performs the task); A – Accountable (approves / is answerable); C – Consulted; I – Informed.

Process / Action	Management Board	ED	Commission Chair	MLP
Approval of this Regulation	A/R	C	C	I
Issuance of the inventory order	I	A/R	C	I
Conducting the inventory	I	A	R	C/I
Preparation of inventory sheets	-	I	R	C
Review of discrepancies	A	R	C	I
Write-off of assets	A	R	C	I
Reporting to donors on assets	I	A/R	C	-
Safekeeping of assets in use	-	A	I	R

V. INVENTORY PHASES

5.1. Preparatory Phase

5.1.1. Issuance of the order to conduct the inventory (Annex A), specifying:

- type of inventory (scheduled / unscheduled / project);
- date of conduct and completion deadlines;
- composition of the Inventory Commission;
- list of objects of inventory;
- MLPs in whose presence the inventory is conducted;
- deadline for submission of inventory materials to the Accounting function.

5.1.2. Prior to the commencement of the physical verification, the Chair of the Commission shall:

- verify the operability of all measurement instruments (where required);
- obtain from each MLP a receipt (Annex B) confirming that all incoming and outgoing documents have been submitted to Accounting before the inventory, that all valuables received have been posted, and that those disposed of have been written off;
- initial all incoming and outgoing documents attached to the registers with the note "To inventory as of ____________";
- obtain from the Accounting function data on asset balances as of the inventory date.

5.1.3. The Accounting function shall provide the Commission with:

- a list of assets and liabilities by MLP and storage location;
- blank inventory sheets (Annex C);
- access to the Fixed Asset Register and IT-inventory.

5.2. Operational Phase (Physical Verification)

5.2.1. The actual existence of assets is established by means of:

- mandatory counting, weighing, or measuring (for inventories);
- visual identification against the inventory number (for FA, LVNTA);
- verification of factory and serial numbers (for equipment, vehicles);
- reconciliation of licence keys and user accounts (for intangible assets and cloud subscriptions).

5.2.2. The inventory shall be carried out by the full composition of the Commission in the presence of the MLP. Entering data on asset balances in inventory sheets from the words of the MLP or from accounting data without physical verification is prohibited.

5.2.3. If the inventory cannot be completed in one day, the premises shall be sealed with the Chair's seal. Inventory sheets shall be kept in a locked room.

5.2.4. The results of the physical verification are recorded in inventory sheets (Annex C), which are prepared:

- separately for each storage location;
- separately for each MLP;
- separately for assets belonging to third parties (leased, held in safekeeping);
- separately for assets procured with funds of each donor / project.

5.2.5. Corrections in inventory sheets are made by striking through the incorrect entries and writing the correct entries above. Corrections shall be signed by all members of the Commission and by the MLP. Erasures and smudging are not permitted.

5.3. Closing Phase

5.3.1. Upon completion of the physical verification, the executed inventory sheets are transferred to the Accounting function for:

- verification of pricing and amounts;
- preparation of reconciliation statements (Act of Discrepancies – Annex D);
- preparation of the draft minutes of the Commission meeting.

5.3.2. The minutes of the Commission meeting shall contain:

- the outcomes of the inventory (actual vs. accounting records);
- the MLPs' explanations regarding identified discrepancies;
- the Commission's decisions on posting surpluses, recovering shortages, and writing off assets;
- recommendations for eliminating the causes of violations.

5.3.3. The minutes of the Commission, together with inventory sheets, reconciliation statements, and written explanations of MLPs, are submitted to the Management Board for approval of decisions on posting / recovery / write-off. Inventory materials are prepared in no fewer than two copies.

VI. SPECIFICS OF INVENTORY OF PROJECT-FUNDED ASSETS

6.1. Tagging of Project Assets

6.1.1. All assets procured wholly or partly with donor grant funds shall be subject to mandatory tagging immediately upon being placed on the accounting records. The tagging scheme is set out in Annex G.

6.1.2. Mandatory elements of the tag:

- the Organization's inventory number (format: RG-YYYY-XXXX, where YYYY is the year and XXXX is the sequential number);
- donor logo / emblem (EU flag for EU projects; logo of the respective fund / agency);
- project identifier / Grant Agreement Number;
- statement on the source of funding: for the EU – "Funded by the European Union"; for the U.S. Department of State – "Funded by the U.S. Department of State"; for UNICEF – "Funded by UNICEF", etc.;
- year of acquisition.

6.1.3. Tagging shall be performed by means of:

- a label printed on a thermal-transfer printer with a laminated coating;
- for small-sized equipment (drives, cables) – a QR-coded sticker linking to the record in the Fixed Asset Register;
- for furniture and premises – a label plate of appropriate size.

6.2. Donor-Restricted Assets

6.2.1. Assets procured with donor funds are deemed donor-restricted for the period defined in the Grant Agreement (typically: 5 years after project closeout under EU FR 2024/2509; in accordance with the specific agreement terms – for 2 CFR 200.313).

6.2.2. During the restriction period, it is prohibited to:

- use the asset for purposes unrelated to the project without the donor's prior written consent;
- transfer the asset to third parties without the donor's consent;
- sell, donate, or otherwise alienate the asset;
- use the asset as collateral or in any other financial instrument.

6.2.3. Restrictions attached to specific assets shall be recorded in the Fixed Asset Register in a dedicated field "Donor restrictions" with an indication of the restriction period.

6.3. Disposal at Project Closeout

6.3.1. At project closeout, the Executive Director initiates a dedicated project inventory of assets procured with funds of that project.

6.3.2. Based on the inventory results, the Organization agrees with the donor on a disposal option:

Disposal option	Description and conditions
Continued use by the Organization	For statutory purposes consistent with the project's objective. The asset continues to be recorded as donor-restricted.
Transfer to a partner / beneficiary	With the donor's consent. Documented by a transfer act; a copy is sent to the donor.
Sale	With the donor's consent at fair market value. Proceeds of sale may be subject to return to the donor in proportion to the donor's funding share (for 2 CFR 200.313(e) – at fair market value).
Return to the donor	Where the terms of the Grant Agreement require the return of the asset or where the donor so requests.
Write-off (disposal / recycling)	In the case of full wear, loss of useful properties, or damage. Supported by a write-off act and a recycling act.

6.4. EU Visibility Requirements

6.4.1. For assets procured with EU funds, EU Visibility Requirements apply (Communication and Visibility Manual for EU External Actions, 2025):

- tagging with the EU emblem (12-star blue emblem);
- the statement "Funded by the European Union" or "Co-funded by the European Union" (in the case of co-financing);
- the proportion of the EU emblem to the Organization's logo – not less than 1:1;
- at public events using EU-funded equipment – placement of banners / signs bearing the applicable statement.

VII. RECORDING OF INVENTORY RESULTS

7.1. Primary Documents

7.1.1. The results of the inventory are documented by the following records:

- Inventory Sheet – Annex C – records the actual existence of assets;
- Reconciliation Statement / Act of Discrepancies – Annex D – records discrepancies between actual data and accounting records;
- Cash Inventory Act (for cash on hand, cash equivalents, monetary documents);
- Act of Inventory of Settlements with Debtors / Creditors;
- Write-off Act – Annex E – for assets subject to write-off;
- Minutes of the Inventory Commission meeting.

7.2. Fixed Asset Register

7.2.1. The Fixed Asset Register is maintained in electronic form (recommended: Google Sheets or dedicated software with backup and version control) and contains the mandatory fields (Annex F):

- inventory number;
- asset name;
- manufacturer, model, serial number;
- date of acquisition, supplier;
- acquisition cost, accumulated depreciation, residual value;
- source of funding (Organization / donor / project);
- MLP, storage location;
- asset condition, date of last inventory;
- donor restrictions, expiry date of restrictions;

- status (in operation / in storage / written off / transferred).

7.2.2. The Fixed Asset Register is updated at minimum after each inventory. A full reconciliation with accounting records is performed at least once a year.

VIII. TREATMENT OF DISCREPANCIES

8.1. Surpluses

8.1.1. Identified surpluses of assets are posted at their fair (market) value as of the inventory date and recognised as income of the Organization (sub-account 746 "Other income from ordinary activities").

8.1.2. Surpluses of targeted-financing funds are returned to the respective donor or reallocated to other project purposes solely on the basis of the donor's written consent.

8.2. Shortages

8.2.1. Identified shortages shall be:

- within natural-wastage norms (for inventories) – written off against expenses;
- in excess of natural-wastage norms – recovered from the MLP in accordance with the Labour Code of Ukraine (Articles 130–138) and the Organization's internal documents;
- where the responsible person cannot be identified or where the court denies recovery – written off against expenses with documentary evidence.

8.2.2. In accordance with Article 135-1 of the Labour Code, a full material liability contract is concluded with the MLP. The amount of recovery is determined at market value, adjusted for wear and tear.

8.2.3. For shortages of assets procured with donor funds:

- the Executive Director shall notify the donor in writing within 10 business days;
- a compensation plan is prepared (at the expense of the MLP or from the Organization's general funds);
- an amount equivalent to the value of the lost asset may be returned to the donor in proportion to the donor's funding share.

8.3. Damaged and Impaired Assets

8.3.1. Assets that have partially lost their utility (damaged, functionally obsolete) are subject to revaluation or write-off by decision of the Commission.

8.3.2. Where assets are identified whose repair is economically unjustified, a Write-off Act is drawn up (Annex E).

IX. WRITE-OFF OF ASSETS

9.1. Grounds for Write-off

9.1.1. Fixed assets and other non-current assets are written off in the following cases:

- physical wear (complete unsuitability for use according to designated purpose);
- functional obsolescence (where continued use or repair is not economically justified);
- damage due to accident, natural disaster, or improper operation;
- loss or theft (upon completion of the investigation);
- expiry of the standard useful life in the absence of residual value.

9.2. Write-off Procedure

9.2.1. Write-off is initiated by the MLP or the head of the relevant unit by way of a memorandum addressed to the Executive Director.

9.2.2. The Executive Director instructs the Commission to inspect the asset and prepare a Write-off Act (Annex E), setting out:

- the full name of the asset and its inventory number;
- its acquisition and residual value;
- the reasons for write-off;
- the Commission's conclusion as to unsuitability;
- proposals for disposition (recycling, sale for parts, free-of-charge transfer).

9.2.3. The Write-off Act is approved by the Management Board of the Organization, except for LVNTA with a unit value up to UAH 5,000, which may be written off upon approval of the Executive Director, with subsequent notification of the Management Board.

9.2.4. Following approval of the Write-off Act, the asset shall:

- be removed from the Fixed Asset Register;
- have its tags / stickers removed (physically or flagged in the register);
- be transferred for recycling to a specialised organization (for electronics – with a recycling certificate in accordance with the Law of Ukraine "On Waste");
- for donor-funded assets – be notified to the donor together with a copy of the Write-off Act.

9.3. Coordination with the Donor

9.3.1. For write-off of assets procured with donor grant funds, during the donor-restricted period the donor's written consent is mandatory.

9.3.2. A request for approval shall be sent no less than 30 calendar days prior to the planned write-off date and shall contain:

- description of the asset and reasons for write-off;
- photographic evidence of the asset's condition;
- the Commission's conclusion;
- proposals on the further fate of the asset.

X. IT INVENTORY

10.1. Objects of IT Inventory

10.1.1. A dedicated IT inventory covers:

- laptops, desktops, monitors;
- smartphones, tablets, GPS devices;
- network and server equipment, routers, NAS;
- peripherals – printers, scanners, projectors, cameras, microphones;
- software licences (Microsoft 365, Adobe Creative Cloud, antivirus);
- cloud subscriptions (Google Workspace, Notion, Slack, AWS, Azure, Monday.com);
- domains, SSL certificates, hosting;
- accounts and access rights (corporate email, GitHub, CRM, banking applications).

10.2. IT Inventory Register

10.2.1. The IT inventory (Annex H) is maintained separately from the general Fixed Asset Register and contains additional fields:

- serial number, MAC address, IMEI;
- operating system, version, date of last update;
- installed software with licences;
- full-disk encryption status;
- date of last backup;
- subscription / licence expiry date.

10.2.2. The IT inventory is performed annually (as at 31 October) and upon change of the IT-responsible person.

10.2.3. The results of the IT inventory are used to update the Procurement Plan for the following year and to evidence compliance with cybersecurity requirements under 2 CFR 200 (2024 revision, the new requirement for internal controls).

10.3. Procedure on Employee Separation

10.3.1. Upon the separation of an employee, the IT-responsible person and the MLP that issued the equipment shall:

- carry out a physical verification of the returned equipment;
- perform a data wipe (full erasure with certification);

- deactivate accounts (corporate email, access to CRM, Slack, Monday.com);
- execute the hand-over and transfer act and update the IT inventory.

XI. DOCUMENT RETENTION AND ARCHIVING

11.1. Retention Periods

Document type	Retention period
Inventory materials for EU projects (FR 2024/2509)	10 years after project closeout
Inventory materials for U.S. Department of State projects (2 CFR 200.334)	Not less than 3 years after the final report; at RUKH Global – 7 years as a safety margin
Inventory materials for UN-agency, GIZ, SIDA projects	Per the specific Grant Agreement; not less than 7 years
Annual inventories (general)	5 years (per Order of the Ministry of Finance of Ukraine No. 578 of 13.12.2023 on document retention periods)
Fixed Asset Register, IT inventory	Permanent (with annual versions archived)
Write-off acts	10 years
Minutes of the Commission	10 years

11.2. Form of Storage

11.2.1. Original paper documents are kept in the Organization's archive (Accounting office) in folders organized by year and project.

11.2.2. Electronic copies (scanned PDF) are stored in the corporate Google Drive in the folder "_archive/Inventory/YYYY/" with restricted access (Executive Director, Chair of the Commission, chief accountant only).

11.2.3. Project inventories are stored separately in the folder "Projects/[Project Name]/Inventory/".

XII. RESPONSIBILITIES

12.1. Management Board

12.1.1. The Management Board approves this Regulation and amendments to it, takes decisions on write-offs of assets, and reviews inventory materials in cases of material discrepancies.

12.2. Executive Director

12.2.1. The Executive Director shall:

- issue orders to conduct inventories;
- ensure proper working conditions for the Commission;
- monitor compliance with deadlines and quality of performance;
- be responsible for donor reporting on project assets;
- bear personal responsibility for the overall state of the Organization's asset accounting in accordance with Clause 5.5.2.3 of the Charter.

12.3. Commission Members

12.3.1. The Chair and members of the Commission are responsible for:

- the completeness, accuracy, and timeliness of entries in inventory sheets;
- the correctness and timeliness of documentation of inventory materials;
- adherence to the principle of independence and absence of conflict of interest;
- confidentiality of interim results.

12.3.2. For wilful inclusion of knowingly false data in inventory sheets, members of the Commission shall be subject to disciplinary liability and, in the cases provided for by law, administrative or criminal liability.

12.4. Materially Liable Persons

12.4.1. MLPs bear full material liability for the safekeeping of assets placed in their charge, on the basis of a full material liability contract.

12.4.2. MLPs shall:

- ensure the integrity and proper storage conditions of assets;
- maintain records of movements of assets within the scope of their responsibility;
- promptly report theft, damage, or loss;
- be present during the inventory of assets under their responsibility;
- provide written explanations for any identified discrepancies.

12.5. Accounting Function

12.5.1. The Accounting function (or the contractor under service agreement):

- prepares accounting data for the Commission;
- prepares reconciliation statements;
- reflects the inventory results in accounting records;
- maintains and updates the Fixed Asset Register;
- archives inventory materials.

XIII. ESCALATION OF VIOLATIONS

13.1. Any identified violations, theft, fraud, or abuse in the area of accounting for and safekeeping of assets shall be reported:

- in the first instance – to the immediate supervisor;
- thereafter – to the Executive Director in writing;
- where involvement of the Executive Director is suspected – directly to the Chairman of the Management Board;
- for anonymous reports – through the Whistleblowing Policy channels (address: whistleblowing@rukh.global or the secure form on the website).

13.2. Within 10 business days from receipt of the report, an internal investigation is initiated with the participation of independent members of the Management Board.

13.3. For donor-funded assets – the donor is notified in parallel within the timeframes stipulated in the Grant Agreement (typically no more than 30 days for the EU; 5 business days for UN agencies).

XIV. MAPPING TO DONOR REQUIREMENTS

Donor requirement	**Source**	**Section of this Regulation**
Property records, tagging, physical inventory every 2 years	2 CFR 200.313 (2024)	Sections 6, 7.2; Annexes F, G
Supplies – accounting for inventories > USD 10,000	2 CFR 200.314 (2024)	Sections 2.1, 7.1
Accounting for fixed assets in EU projects	EU FR 2024/2509	Sections 1.2, 6, 11
Visibility Requirements for EU-funded assets	Creative Europe Guidelines 2025; EU Communication and Visibility Manual	Section 6.4; Annex G
Asset register for partnership with UN agencies	UN Partner Portal Due Diligence	Section 7.2; Annex F
Cybersecurity as a component of internal controls	2 CFR 200 (2024)	Section 10.2
Partner Capacity Assessment	GIZ PCA; SIDA Contribution Regulations	Entire Regulation
Effective management of resources	Core Humanitarian Standard (Commitment 9)	Entire Regulation

XV. FINAL PROVISIONS

15.1. This Regulation enters into force upon approval by the Management Board of NGO "RUKH Global" and signature by the Chairman of the Management Board.

15.2. This Regulation shall be reviewed at least once every two years, and also in the case of:

- changes in the legislation of Ukraine (Law No. 996-XIV; Order of the Ministry of Finance No. 879; Tax Code of Ukraine);
- changes in donor requirements (EU FR; 2 CFR 200; ADS Chapter 303; UN Partner Portal);
- material changes in the structure or areas of activity of the Organization;
- identification of an incident (theft, material shortage) or a complaint through the whistleblowing channel;
- amendments to the Charter of NGO "RUKH Global".

15.3. Responsibility for timely review rests with the Executive Director. Draft amendments are submitted to the Management Board for consideration.

15.4. All employees of the Organization, as well as MLPs holding assets in their charge and members of inventory commissions, shall acknowledge this Regulation by signature. A copy of this Regulation shall be placed on the Organization's internal portal.

15.5. Matters not regulated by this Regulation shall be governed by the Order of the Ministry of Finance of Ukraine No. 879 of 02.09.2014, Law of Ukraine No. 996-XIV "On Accounting and Financial Reporting in Ukraine", and other legal acts of Ukraine.

15.6. In the event of conflict between this Regulation and the provisions of Ukrainian legislation or the terms of a specific Grant Agreement, the provisions of law / the donor's requirements shall prevail.

ANNEXES

Annex A. Order to Conduct an Inventory (template)

NON-GOVERNMENTAL ORGANIZATION "RUKH GLOBAL"

ORDER No. ___

"___" _____________ 20___ City: ___________________

Subject: Conducting the inventory of assets and liabilities

Pursuant to Article 10 of Law of Ukraine No. 996-XIV "On Accounting and Financial Reporting in Ukraine", Order of the Ministry of Finance of Ukraine No. 879 of 02.09.2014, and the Inventory Regulation of NGO "RUKH Global",

I HEREBY ORDER:

1. To conduct a _____________________________ (scheduled annual / unscheduled / project) inventory of _____________________________ (assets / liabilities / project "_____").

2. To set the deadlines: from "___" ______ 20___ through "___" ______ 20___.

3. To approve the composition of the Inventory Commission:

- Chair of the Commission – ___________________________________ (full name, position);
- Members of the Commission – ___________________________________ (full name, position);
- Secretary – ___________________________________ (full name, position).

4. Materially liable persons shall ensure their attendance and provide access to the objects of inventory.

5. The chief accountant shall submit to the Commission the necessary registers and accounting data by "___" ______ 20___.

6. Inventory materials shall be submitted to the Head of the Organization for approval by "___" _______ 20___.

7. I reserve to myself oversight of the execution of this order.

Head of the Organization ________________________ / IGOR DUDKA /

Annex B. Receipt of the Materially Liable Person

RECEIPT

I, ____ (full name, position),

the materially liable person for _______________________________ (name of assets / warehouse / IT equipment), hereby confirm:

1. Prior to the commencement of the inventory as of "___" ________ 20___, all incoming and outgoing documents relating to the assets in my charge have been transferred to the Accounting function.

2. All assets received into my charge have been posted to accounting records; all assets disposed of have been written off.

3. Assets temporarily located outside the main storage location (with employees, on business trips, at events) are recorded in _______________________________ (issuance log / internal register).

4. There are no assets that are not accounted for.

MLP signature __________________________ Date: "___" ________ 20___

Annex C. Inventory Sheet – template

No.	Asset name	Inv. No.	Serial No.	Unit	Quantity (actual)	Value, UAH
1						
2						
3						
4						
5						
6						
7						
8						

Commission members: __________________ / __________________ / __________________

MLP: __________________ Signature: __________________ Date: "___" ________ 20___

Annex D. Act of Discrepancies – template

No.	Asset name	Per records	Actual	Surplus / Shortage	Cause / decision
1					
2					
3					
4					
5					
6					

Commission decision: ____

Chair of the Commission: _______________ Members: _______________ / _______________

MLP explanation: ____

Annex E. Asset Write-off Act – template

ACT No. ___ on the write-off of assets

"___" ______ 20___ City: __________________

Commission composed of: _________________________________ (Chair, Members)

Pursuant to the Order of the Head of the Organization No. ___ of "___" ______ 20___, carried out an inspection of assets subject to write-off:

No.	Asset name	Inv. No.	Acquisition cost	Residual	Reason for write-off
1					
2					
3					
4					

Commission conclusion: the assets are recognized as unsuitable for further use; they are subject to write-off from the balance sheet and transfer for recycling.

Coordination with donor (for project-funded assets): ________________________________

Chair of the Commission: _______________ Members: _______________ / _______________

APPROVED by decision of the Management Board of "___" ______ 20___, Minutes No. ___

Annex F. Fixed Asset Register – template structure

Mandatory fields of the fixed-asset register:

No.	Field	Data type	Example / Description
1	Inventory No.	Text (RG-YYYY-XXXX)	RG-2026-0001
2	Asset name	Text	Laptop MacBook Pro 14"
3	Category	List (FA / LVNTA / IA / Inventories)	LVNTA
4	Manufacturer / model	Text	Apple / M3 Pro
5	Serial number	Text	C02XYZ123ABC
6	Date of acquisition	Date	15.05.2026
7	Supplier	Text	Rozetka / Apple Store
8	Acquisition cost	Number (UAH / EUR / USD)	UAH 85,000
9	Depreciation, residual value	Number	Automatically calculated
10	Source of funding	List (Own / Donor)	Creative Europe COOP-2025-001
11	Grant Agreement No.	Text	CREA-CULT-2025-COOP-XXX
12	Donor share, %	Number 0–100	80%
13	MLP	Text	Ivanenko I.I., Project Manager
14	Storage location	Text	Office, Kyiv / Kraków Office
15	Condition	List	New / In use / Needs repair / Unsuitable

16	Donor restrictions	Text	Restricted until 31.12.2030
17	Date of last inventory	Date	31.12.2026
18	Status	List	In use / Written off / Transferred

Annex G. IT Inventory – template

Additional fields for IT inventory (beyond the fields of the Fixed Asset Register):

No.	Field	Description
1	MAC address / IMEI	Network identifier of the device
2	OS, version	macOS 14.4 / Windows 11 Pro / iOS 18.3
3	Disk encryption	FileVault / BitLocker – yes/no, activation date
4	Installed software + licences	Microsoft 365 E3 / Adobe CC / Zoom Pro – with licence IDs
5	Cloud subscriptions	Google Workspace (seat), Slack (user), Monday.com (seat)
6	Antivirus / EDR	Name, version, date of last update
7	Backup	Method, frequency, date of last backup
8	Subscription / licence expiry date	e.g.: 31.07.2026
9	Access rights	GitHub, CRM, banking client, email – privilege levels
10	Wipe / return	Status on employee separation (date, person responsible)

Annex H. Tagging Scheme for Donor-Funded Assets

Structure of the label affixed to assets procured with donor funds:

```
+---------------------------------------------------------------+
|  [RUKH Global logo]          [Donor emblem / logo]            |
|                                                               |
|  Inventory No.: RG-2026-0001                                  |
|  Grant: CREA-CULT-2025-COOP-XXX                               |
|  Funded by the European Union                                 |
|  Property of NGO "RUKH Global"                                |
|  [QR code linked to the Fixed Asset Register entry]           |
+---------------------------------------------------------------+
```

Funding-source statements for different donors:

Donor	Mandatory statement	Logo / emblem
European Union (Creative Europe, Erasmus+, CERV, Horizon Europe, Interreg)	"Funded by the European Union" or "Co-funded by the European Union"	12-star blue EU emblem
U.S. Department of State	"Funded by the U.S. Department of State"	U.S. Department of State seal
UNICEF	"Funded by UNICEF"	UNICEF logo (cyan)
UNHCR / IOM / UNDP	"Funded by [Agency name]"	Logo of the respective agency
GIZ	"Implemented by GIZ on behalf of BMZ"	GIZ + BMZ logos
SIDA	"Supported by Sida"	Sida logo
Private foundations (embassies, corporate foundations)	Per the terms of the Grant Agreement	Per the donor's provided brand kit

Technical requirements for labels:

- material: vinyl film with lamination or polyester label;
- size: 50 × 30 mm (for small-size equipment); 80 × 50 mm (for laptops, furniture); 150 × 100 mm (for large-size equipment);
- resistance: to moisture, UV, and temperature variations (−20°C to +80°C);
- service life: at least 5 years;
- placement: in a visible location that does not hinder operation (rear/side surface of equipment).