

NGO «РУКХ 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

CODE OF ETHICS AND CONDUCT

(Code of Conduct) of the Non-governmental organization "RUKH Global"

Version: 1.0
Effective date: 17 April 2026
Next review: April 2028 (or upon change of legal basis / donor requirements)
Responsible for maintenance: Ethics Officer / Executive Director
Approved by: Management Board of NGO "RUKH Global"

A Word from the Leadership

Dear colleagues, volunteers, and partners,

RUKH Global is a community that stands on the shoulders of the idea of freedom and human dignity. Our Code is not a formality for donor audits — it is a living agreement among us about how we want to work and who we want to be together. We believe that the strength of our organization lies not in documents, but in the daily decisions of every person who represents RUKH.

This Code helps us make difficult decisions, protect our beneficiaries and one another, and remain transparent before partners, donors, and the Ukrainian community in Europe and worldwide. Please read it carefully, discuss it openly — and live by it.

With respect, Igor Dudka, Chairman of the Management Board, NGO "RUKH Global".



1. Our Mission and Values

1.1. The mission of RUKH Global is to unite the Ukrainian diaspora in Europe and worldwide around shared cultural, digital, and civic projects, to cultivate Ukrainian identity, and to build bridges with the European cultural space.

1.2. The values that form the foundation of this Code:

- Freedom — national, creative, and personal; the right of every person to be themselves.
- Human dignity — a central principle that prevails over any commercial, political, or reputational interests.
- Justice and the rule of law — commitment to legality, democratic institutions, and human rights.
- Ukrainian-centric + European — we are Ukrainians, part of the European cultural community; not an "either/or" choice, but rather "both/and".
- Professionalism and quality — we do what we promise, and we do it well.
- Transparency and accountability — we are open to our community, donors, and each other.
- Care and solidarity — we look after colleagues, beneficiaries, and volunteers; we do not abandon our own.
- Innovation and courage — we are not afraid of new formats, digital tools, or bold subjects.

2. General Provisions

2.1. This Code of Ethics and Conduct (hereinafter — the Code) defines the standards of professional and personal conduct to be observed by all of us who are involved in the activities of NGO "RUKH Global".

2.2. Scope of application. The Code is mandatory for:

- members of the Management Board, the Chairman of the Management Board, and the Executive Director;
- full-time employees (on the basis of an employment contract);
- persons engaged under civil-law contracts (CLC);
- volunteers (under the Law of Ukraine No. 3236-VI "On Volunteer Activity");
- trainees and interns;
- contractors and consultants (to the extent specified in the respective contract);
- official representatives of RUKH at events, in the media, and on social networks.

2.3. The Code does not replace but complements other RUKH Global policies, in particular:

- Anti-Corruption Policy (Policy No. 7);
- Anti-fraud and Conflict of Interest Policy (Policy No. 13);
- PSEAH Policy (Policy No. 3);
- Personal Data Processing and Protection Regulation (Policy No. 10);
- Recruitment Instruction (Policy No. 5);
- Procurement Policy (Policy No. 4).

2.4. The Code does not cover every possible situation — it serves as the foundation for making ethical decisions. In case of doubt, refer to Section 12 (resolution of ethical conflicts).

3. Legal Basis

This Code has been developed taking into account:

- the Charter of NGO "RUKH Global", in particular provisions concerning the purpose, areas of activity, and rights/obligations of members;
- Law of Ukraine No. 4572-VI of 22 March 2012 "On Public Associations" (in the wording as of 03.09.2024), Article 21;
- Law of Ukraine No. 1700-VII "On Prevention of Corruption";
- Law of Ukraine No. 2297-VI "On Personal Data Protection";
- Law of Ukraine No. 2866-IV "On Ensuring Equal Rights and Opportunities for Women and Men";
- Law of Ukraine No. 5207-VI "On the Principles of Preventing and Combating Discrimination";
- the Constitution of Ukraine (Articles 21, 24, 28);
- the UN Universal Declaration of Human Rights (1948);
- the European Convention on Human Rights (1950);
- UN Global Compact (10 Principles: human rights, labour, environment, anti-corruption);
- INGO Accountability Charter / Accountable Now (12 accountability commitments);
- Core Humanitarian Standard (9 Commitments);
- Regulation (EU, Euratom) 2024/2509 (EU Financial Regulation) — requirements for beneficiaries;

- the Madrid Code for International NGO Activity;
- the Code of Ethics of the International Federation of Journalists (IFJ) (for communications work).

4. Our Commitments

4.1. Towards beneficiaries

- "Do no harm" principle: do not cause harm to beneficiaries through our actions or inaction.
- Informed consent: obtain informed consent prior to any data collection, interview, or photography.
- Accountability to Affected Populations (AAP): seek the views of beneficiaries, take them into account, and explain decisions.
- Non-discrimination: RUKH services are available regardless of origin, sex, age, language, religion, political views, sexual orientation, health status, or IDP/refugee status.
- Trauma-informed approach: awareness of the traumatic experience of war; avoidance of re-traumatization.
- Child protection: special care; parental/guardian consent; child-friendly communication.
- Confidentiality: personal data of beneficiaries are sacred; no public references without consent.

4.2. Towards colleagues

- Respect for every person regardless of position, experience, or background.
- Constructive feedback: critique ideas, not personalities; in an appropriate format (privately, in a timely manner).
- Prohibition of any form of bullying, mobbing, or harassment.
- Recognition of colleagues' contributions; do not appropriate others' ideas or results.
- Support for the professional growth of colleagues; mentorship.
- Inclusive language — gender-neutral and sensitive.

4.3. Towards the Organization

- Loyalty to the mission — actions on behalf of RUKH shall be consistent with the Organization's values and priorities.
- Careful use of resources (funds, equipment, time).
- Confidentiality of internal information (strategic plans, financial details, HR matters).
- Protection of the Organization's reputation in the public space.
- Timely reporting of risks and problems to management.

4.4. Towards partners and donors

- Honesty in reporting — no "creative" recasting of results.
- Respect for the terms of Grant Agreements.
- Transparency in the use of funds; prevention of double-dipping (double funding of the same activity).
- Visibility of donor contributions in accordance with their rules (EU Visibility Requirements).
- Partner respect: partners are not "executors of our ideas" but equal participants.

4.5. Towards society and the State

- Compliance with the applicable legislation of Ukraine, Poland, and the countries where projects are implemented.
- Timely reporting to the State Tax Service, the Ministry of Justice, the Pension Fund of Ukraine, and the State Statistics Service.
- Participation in legitimate forms of public dialogue.
- Respect for official symbols, historical memory, and religious and national holidays.

5. Unacceptable Conduct (Zero Tolerance)

The following actions constitute gross violations of this Code and shall entail sanctions up to and including termination of employment / termination of contract and referral of the matter to law-enforcement authorities:

5.1. Corruption and fraud

- Offering, giving, receiving, or soliciting undue advantage (see Policy No. 7).
- Manipulation of financial documents, inflation of invoices, ghost employees, ghost beneficiaries (see Policy No. 13).
- Facilitation payments (so-called "gratitude payments" for expediting procedures).

5.2. Sexual exploitation, abuse, and harassment (PSEAH)

We apply the principle of zero tolerance. Details are set out in the PSEAH Policy (Policy No. 3):

- Sex in exchange for assistance/services — strictly prohibited.
- Sex with children (under the age of 18) — prohibited regardless of the national "age of consent".
- Sexual harassment of colleagues, volunteers, or beneficiaries.
- Distribution of intimate materials without consent (revenge porn).

5.3. Discrimination

Negative prejudicial treatment is prohibited on the grounds of: sex, gender identity, sexual orientation (SOGI), age, language, religion, ethnic origin, disability, IDP/refugee status, political beliefs, social or financial status, or family status.

5.4. Bullying, mobbing, psychological violence

- Systematic humiliation, isolation, or overloading with tasks with the aim of forcing resignation.
- Public humiliation, shouting, insults.
- Cyberbullying (through work chats, email, or social networks).

5.5. Domestic violence

RUKH Global recognizes that domestic violence may affect the work environment. We undertake to:

- Not stigmatize colleagues affected by domestic violence.
- Provide information about available support (hotline "La Strada-Ukraine" 116 123; "Poruch").
- Where necessary — offer flexible working hours, legal consultation, and temporary housing.

5.6. Disinformation, hate speech, language of enmity

- Deliberate dissemination of false information.
- Hate speech directed at any groups.
- Demeaning the memory of victims of war/genocide.

5.7. Political misuse of position within RUKH

- Campaigning on behalf of RUKH for specific politicians, parties, or election campaigns.
- Use of the Organization's databases for partisan purposes.
- Advocacy activity within the scope of RUKH's mission — is permitted.

5.8. Breach of confidentiality

- Disclosure of personal data of beneficiaries or colleagues.
- Disclosure of internal documents (budgets, strategies, reports to donors) without authorization.

5.9. Undeclared conflict of interest

Details are set out in Policy No. 13. In this Code we establish the obligation to declare any potential, perceived, or actual conflict of interest (COI).

6. Use of Organizational Resources

6.1. Financial resources

- Expenditures shall be made solely in accordance with the approved project budget.
- Eligible costs (reasonable, necessary, allocable) shall comply with donor requirements.
- Personal expenses shall never be charged to the Organization's accounts.

6.2. Office equipment and infrastructure

- Work equipment is to be used for work-related tasks. Personal use is permitted within reasonable limits.
- The IT policy shall be observed: MFA, encrypted devices, VPN.
- Upon termination — return of equipment in accordance with Order of the Ministry of Finance No. 879.

6.3. Time and attention

- Working hours are devoted to the mission of RUKH. Secondary employment for full-time staff is permitted only with the written authorization of the Executive Director.
- Right to disconnect — we respect weekends, vacations, and the night-time hours of colleagues.

6.4. Intellectual property

- Works created within the scope of official duties belong to RUKH Global.
- Works created outside of work (personal blogs, articles, artistic projects) belong to the author.

- In case of doubt — a written IP agreement shall be concluded prior to the start of work.

6.5. Gifts and hospitality

- Up to UAH 500 / EUR 25 — may be accepted without declaration (symbolic).
- UAH 500–2,000 / EUR 25–100 — declaration to the direct supervisor is required.
- Over UAH 2,000 / EUR 100 — shall not be accepted personally; may be transferred to the Organization.
- Cash, credit cards, and expensive alcoholic beverages — shall never be accepted, regardless of value.

7. Political Neutrality of the Organization

7.1. RUKH Global is a non-partisan non-governmental organization. We may advocate for values (freedom, dignity, Ukraine's European choice, support for Ukraine in the war) — and this does not constitute party politics.

7.2. Personal political engagement of employees and volunteers:

- Is permitted during off-duty time.
- Shall not create a conflict of interest with the activities of RUKH.
- Shall not make use of RUKH resources, brand, or databases.
- In the event of candidacy for elective office — unpaid leave is mandatory.

7.3. Official statements on behalf of RUKH shall be made exclusively by the Chairman of the Management Board or the Executive Director (or persons to whom this authority has been delegated).

8. Social Media and Public Statements

8.1. Personal social-media accounts are a private sphere, yet they affect the reputation of RUKH if the profile is public.

8.2. Separation: the profile should indicate "personal views do not represent the position of RUKH Global" where the employee/member actively engages in public commentary.

8.3. The following is prohibited:

- Publishing internal documents or photographs of beneficiaries without their consent.
- Discussing personnel conflicts, dismissals, or internal disputes.
- Conducting polemics with partners or donors in open discussions without prior agreement.
- Publishing exclusive information prior to the official release.

8.4. In crisis situations (incident, scandal) external communication shall be carried out solely through the Communications Lead, with the prior agreement of the Executive Director.

9. Confidentiality

9.1. Categories of confidential information

- Personal data of beneficiaries, employees, volunteers, and donors (lifelong for sensitive categories; see Policy No. 10).
- Financial information (budgets, reports, payroll calculations).
- Strategic information (plans, negotiations with partners).
- HR information (recruitment processes, evaluations, disciplinary proceedings).
- Partner information under NDA.

9.2. Duration of the obligation

- During employment — unconditional.
- After termination: personal data of beneficiaries — for life; commercial confidential information — for 3 years; particularly sensitive data (ID, finance, health) — in accordance with applicable legislation.

10. Accountability and Reporting of Violations

10.1. Every member of the RUKH community is obliged to report known violations of this Code and of other policies.

10.2. Reporting channels

- The direct supervisor (unless the supervisor is the alleged violator).
- Ethics Officer (the function is currently performed by the Executive Director in the absence of a dedicated position): hello@rukhh.global.
- Anonymous form on the website: rukhh.global/ethics.
- The Chairman of the Management Board — for cases involving the Executive Director or systemic violations.

- External legal consultation (hotline "La Strada-Ukraine" 0 800 500 335) — for PSEAH and domestic violence.

10.3. Whistleblower protection

- No retaliation pledge. Retaliation itself constitutes a separate violation of the Code.
- Confidentiality of the reporter's identity (except where disclosure is required by criminal proceedings).
- Anonymous reports — are considered. The absence of a name is not grounds for ignoring a report.

10.4. Bystander intervention

If you witness unacceptable conduct (aggression, harassment, fraud), we encourage safe intervention: ask the affected person whether assistance is needed; interrupt the situation; report afterwards. Inaction in the face of known violations is itself an ethical problem.

11. Sanctions for Violations

11.1. Disciplinary sanctions (under the Labour Code of Ukraine and the Charter):

- Verbal reprimand.
- Written warning.
- Reprimand.
- Dismissal (for gross violations as provided in the Labour Code of Ukraine).
- Termination of a civil-law contract or volunteer agreement.

11.2. Additional consequences:

- Referral of materials to law-enforcement authorities (in cases of criminal offences).
- Public statement of suspension (for high-profile cases that damage the reputation of the Organization).
- Reimbursement of material damages.
- Inclusion on an internal "do not rehire" register.

11.3. Proportionality: the sanction shall correspond to the gravity, context, intent, and prior conduct of the individual.

11.4. Procedure: review is conducted by the Ethics Committee (3 persons: the Executive Director, an HR representative, and a member of the Management Board). A decision is issued within 30 days. The right of appeal lies with the Management Board.

12. How to Make Difficult Decisions

12.1. Decision tree for ambiguous situations:

- Step 1: Is it lawful? (No → stop, seek advice.)
- Step 2: Does it comply with the Code and RUKH policies? (No → same.)
- Step 3: Will I be able to openly explain this to colleagues, donors, and the press? (No → do not do it.)
- Step 4: Does it harm beneficiaries? (Yes → stop.)
- Step 5: In case of doubt — consult the Ethics Officer.

12.2. Where to turn in different situations

Situation	Where to turn
Personal conflict with a colleague	Direct supervisor → HR
Suspicion of fraud	Ethics Officer + Chairman of the Management Board
Sexual harassment, PSEAH	PSEAH Focal Point; La Strada 116 123
Domestic violence (personal)	HR (confidentially) + La Strada 0 800 500 335
Conflict of interest	Ad hoc COI Disclosure (Policy No. 13)
Reputational crisis	Communications Lead + Executive Director
Psychological support	MHPSS programme; "Poruch" +38 066 319 20 37

12.3. Rights of the affected person

- To be heard.
- To have confidentiality preserved.
- To receive information on the progress of the review.
- To be accompanied by a person of trust.
- Safety and freedom from retaliation.

13. Signing and Review of the Code

13.1. This Code shall be signed:

- by all full-time employees — upon engagement (as part of onboarding);
- by volunteers — upon entering into the volunteer agreement;
- by contractors — as an annex to the contract;
- by members of the Management Board — upon joining the Board.

13.2. Annual reaffirmation: each January, all persons continuing their engagement shall sign the Acknowledgement Form (Annex A).

13.3. Review of the Code: every 2 years, or upon triggering events (change in legislation, incident, amendment of the RUKH Charter, request from a donor). The review is initiated by the Ethics Officer and approved by the Management Board.

14. Final Provisions

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

14.2. From the effective date, all previous internal ethical norms that contradict this Code are deemed invalid.

14.3. A public version of the Code shall be posted on the website rukhh.global for reference by partners, donors, beneficiaries, and the public.

14.4. The official language of the Code is Ukrainian. The English-language version is supplementary.

Annex A. Attestation of Receipt and Acknowledgement (Acknowledgement Form)

I, _____ (Full Name),

holding the position / performing the role of _____

at NGO "RUKH Global" since "___" _____ 20___,

hereby attest and acknowledge that:

- I have received and read the Code of Ethics and Conduct of NGO "RUKH Global", version 1.0 of 17 April 2026.
- I understand my obligations under this Code.
- I undertake to comply with the Code throughout the entire period of my cooperation with RUKH.
- I am aware that a violation may result in disciplinary and/or legal consequences.
- I know where to turn with questions regarding the Code and with reports of violations.

Date: "___" _____ 20___

Signature: _____

Received by: Ethics Officer / HR: _____

Annex B. Ethics Officer — Competence

B.1. The Ethics Officer is a person appointed by decision of the Management Board who coordinates the implementation of this Code.

B.2. Until a dedicated appointment is made, the function of the Ethics Officer is performed by the Executive Director. In matters personally concerning the Executive Director, the function is performed by the Chairman of the Management Board.

B.3. Contacts: hello@rukhh.global (subject line: "Ethics") — confidential mailbox.

B.4. Authority:

- To receive reports and complaints and to ensure confidentiality.
- To conduct a preliminary review and determine the scope of the violation.
- To convene the Ethics Committee.
- To recommend sanctions to the Executive Director / Management Board.
- To report annually to the Management Board on the state of ethical culture (anonymized).
- To prepare proposals for the review of the Code.

Annex C. Decision Tree — "Do I Have an Ethical Dilemma?"

Step 1. Describe the situation. What exactly is happening? Who is involved? What is troubling me?

Step 2. Check the law. Is there a rule of Ukrainian, Polish, or European law governing this situation?

Step 3. Check RUKH policies. Is there a clear provision in the Code, the Anti-Corruption Policy, the PSEAH Policy, or Policy No. 13?

Step 4. "Newspaper front-page test". Would I want this decision to become public on the front page of "Ukrainska Pravda"?

Step 5. "Mirror test". Will I be able to explain my decision to colleagues, family, and beneficiaries without shame?

Step 6. "Beneficiary test". How will this decision affect the most vulnerable people with whom we work?

Step 7. If in doubt — DISCUSS. Ethics Officer, HR, colleagues. No one should resolve ethical dilemmas alone.

Annex D. Matrix Linking the Code to Other Policies

Code topic	Detailed document
Anti-corruption, gifts	Policy No. 7 — Anti-Corruption Policy Regulation
Conflict of interest, fraud	Policy No. 13 — Anti-fraud and COI Policy
Sexual exploitation, harassment	Policy No. 3 — PSEAH Policy
Personal data, confidentiality	Policy No. 10 — Personal Data Regulation
Recruitment, onboarding	Policy No. 5 — Recruitment Instruction + Policy No. 11 — HR Service Regulation
Procurement, suppliers	Policy No. 4 — Procurement Policy
Financial reporting	Policy No. 1 — Financial Policies + Policy No. 2 — Monitoring, Evaluation, and Reporting
Beneficiary-centred approach	Policy No. 6 — Target Audience Needs Assessment Instruction
Business travel, representation	Policy No. 8 — Business Travel Regulation

Annex E. Support Contacts

E.1. Hotlines in Ukraine

- National Hotline for the Prevention of Domestic Violence, "La Strada-Ukraine": 0 800 500 335 (from mobile 116 123), free of charge, 24/7.
- Psychological support line "Poruch" (for displaced persons and those affected by war trauma): +38 066 319 20 37.
- National Child Hotline: 0 800 500 225 (from mobile 116 111).
- National Agency on Corruption Prevention (NAZK) — reporting corruption: корупція.net.

E.2. Europe / Poland

- Niebieska Linia (Poland, domestic violence): 800 120 002.
- Feminoteka (Poland, sexual violence): +48 731 731 551.
- European Union Agency for Fundamental Rights: fra.europa.eu.

E.3. Inside RUKH

- Ethics Officer / Executive Director: hello@rukhh.global (subject line "Ethics / Confidential").
- Chairman of the Management Board: hello@rukhh.global (subject line "Chair / Confidential").
- Anonymous form: rukhh.global/ethics (planned).

Mapping of Code Provisions to Donor Requirements

Code provision	Corresponding donor requirement / standard
Accountability to beneficiaries (4.1)	CHS Commitment 4–5; Accountable Now Standard 2
Zero tolerance for PSEAH (5.2)	UN ST/SGB/2003/13; IASC Six Core Principles
Anti-corruption, gifts (5.1, 6.5)	EU FR 2024/2509 Art. 36; 2 CFR 200.112–113; ISO 37001:2016
Whistleblower protection (10.3)	2 CFR 200.217; EU Whistleblower Directive 2019/1937
Confidentiality of personal data (9.1)	GDPR (EU 2016/679); Law of Ukraine No. 2297-VI
Political neutrality (7)	INGO Accountability Charter; US Non-Partisan NGO Rules
Donor visibility (4.4)	EU Visibility Requirements; Creative Europe Communication Handbook
Non-discrimination (5.3)	UN Global Compact Principles 1–6; Sida Equality Policy