“APPROVED”
by the Minutes № 1
of the Meeting
of the Supervisory Board of the
CO “CF “ADRA UKRAINE”
dated 5th of June 2025

Corruption and Fraud Prevention Policy of

CO “CF “ADRA Ukraine”

Kyiv, 2025

Preamble

By adopting this **Corruption and Fraud Prevention Policy** (hereinafter referred to as the Policy) **CHARITABLE ORGANISATION "ADVENTIST DEVELOPMENT AND RELIEF AGENCY IN UKRAINE"** (hereinafter referred to as the CO "CF "ADRA UKRAINE" or the Organisation) declares that its employees, officials, management and founders (members), in their internal activities as well as in legal relations with partners, public authorities, local governments, other legal entities and individuals, shall be guided by the principle of zero tolerance towards any manifestations of corruption and fraud and shall take all measures provided for by law to prevent, detect and combat corruption and related actions (practices).

I. General Provisions and Definitions

1. The Policy is a set of rules, standards and procedures for detecting, countering and preventing corruption in the activities of CO "CF "ADRA UKRAINE".
2. The Policy establishes standards and requirements not lower than those stipulated by the applicable legislation of Ukraine, including, but not limited to: The Criminal Code of Ukraine, the Law of Ukraine "On Prevention of Corruption" (hereinafter the "Law") and the Model Anti-Corruption Programme, approved by the decision of the National Agency on Corruption Prevention.
3. The terms used in the Policy have the meanings given in the Law.
4. The text of the Policy is permanently accessible to employees, officials of the CO "CF "ADRA UKRAINE", as well as to its partners, and any legal or natural persons.

II. Basic Principles

Zero Tolerance — the Organisation does not tolerate or condone any form of fraud or related activities.
Transparency — the Organisation ensures openness in both internal and external processes, including reporting to donors, partners, and beneficiaries.
Accountability — all stakeholders share responsibility for complying with the provisions of this Policy.
Integrity Protection — the Organisation promotes and upholds a culture of ethics and professional conduct.
Whistleblower Protection — the Organisation guarantees the safety and confidentiality of individuals who report violations.

III. Terms and Definitions

1. Corruption is generally defined as the abuse of power (entrusted authority) for private gain.
2. Corruption encompasses both the acceptance and payment of bribes and other forms of active or passive misconduct, including, but not limited to: bribery (active and passive), favouritism (blatancy), money laundering, kickbacks, extortion, embezzlement, corruption in relation to gifts. The CO "CF "ADRA Ukraine" also considers all forms of deliberate misuse of entrusted funds, in violation of agreements with Affiliates, to constitute corrupt practices.
3. A corruption offence is an act containing signs of corruption for which the law establishes criminal, disciplinary and/or civil liability.

4. Fraud is the misappropriation of another person's property or the unlawful acquisition of property rights through deception or breach of trust. Fraud may include, but is not limited to, the misappropriation of cash or other assets (e.g. through fraudulent claims or payments, fraudulent deliveries, or falsification of accounting documents related to goods/services/works), as well as intentional misrepresentation, omission, or destruction of information.
5. Fraud can take many forms, including but not limited to:
   - illegal activities that lead to actual or possible losses in the CO "CF "ADRA UKRAINE" (including theft of funds, goods or other property, misuse of property);
   - intentional falsification, concealment, destruction or use of falsified documentation;
   - disclosure of confidential and protected information, improper use of information.
6. Fraud and corruption do not necessarily mean immediate financial gain for the person/persons committing such acts, but may cause financial, property or reputational damage to the CO "CF "ADRA UKRAINE", Affiliates, including donor organisations, beneficiaries.

IV. Scope of the Policy

1. The Policy applies directly to all employees of the CO "CF "ADRA UKRAINE", including all persons working at the CO "CF "ADRA UKRAINE" under a regular employment contract, members of the Supervisory Board, volunteers, interns and students undergoing internships (hereinafter referred to as the **"Personnel").**
2. The CO "CF "ADRA UKRAINE" expects that all partner organisations and their staff, project donors, consultants, contractors and/or any relatives, third parties, individuals and/or legal entities involved or likely to be involved in the procurement of works, goods and services for the CO "CF "ADRA UKRAINE" (hereinafter referred to as **"Affiliates"**) will read and comply with this Policy. The CO "CF "ADRA UKRAINE" has the right to take all necessary actions to eliminate the influence/involvement of Affiliates in case of violation of the requirements of this Policy.
3. The CO "CF "ADRA UKRAINE" applies this Policy in all relations with Affiliates, beneficiaries and any third parties, expecting mutual integrity, transparency, rejection of corruption, fraud, abuse of assistance and other illegal practices on their part.
4. The Policy applies anywhere and at any time, including working and non-working hours (including holidays), at the workplace and outside it, in Ukraine and abroad.
5. ADRA member organisations shall adopt their own anti-corruption and anti-fraud policies, which must be aligned with this Policy. In the absence of their own anti-corruption and anti-fraud policy, ADRA member organisations, when implementing programmes and projects jointly with the CO "CF "ADRA UKRAINE", undertake and guarantee to comply with this Policy.
6. If the agreement with a donor organisation provides for higher standards of anti-corruption and anti-fraud, the Personnel involved in the implementation of such a project/programme shall comply with the terms and conditions set out in the relevant agreement.

V. Anti-Corruption and Anti-Fraud Measures in the Activities of the CO "CF "ADRA UKRAINE"

1. The list of anti-corruption and anti-fraud measures in the activities of the CO "CF "ADRA UKRAINE":

1.1. The CO "CF "ADRA UKRAINE" ensures the development and implementation of measures that are necessary and sufficient to prevent, detect and counter corruption in its activities.

2.1. Anti-corruption and anti-fraud measures include:

- periodic assessment of corruption and fraud risks in the activities of the CO “CF “ADRA UKRAINE”;
- anti-corruption standards and procedures in the activities of the CO “CF “ADRA UKRAINE”.

3.1. The main anti-corruption and anti-fraud standards and procedures of the CO “CF “ADRA UKRAINE” include:

- ensuring that all employees are familiar with the contents of this Policy and participate in relevant anti-corruption and anti-fraud training sessions;
- ensuring that all employees are familiar with all other internal Policies in effect at the time of familiarisation;
- establishing partner selection criteria that include anti-corruption due diligence;
- including provisions requiring mandatory compliance with this Policy in documents issued by the CO “CF “ADRA UKRAINE”;
- imposing restrictions on the support of political parties or movements by the CO “CF “ADRA UKRAINE”;
- defining professional ethics standards, as well as duties and prohibitions applicable to employees;
- gift restrictions;
- performance by employees of functions related to the prevention of corruption.

2. Periodic assessment of corruption risks in the activities of the CO “CF “ADRA UKRAINE”:

2.1. The CO “CF “ADRA UKRAINE” shall carry out an internal assessment of corruption risks in its activities at least once a year.

2.2. A corruption risk is the substantiated probability of occurrence of the event of the corruption or corruption-related offence or violation of this Policy.

2.3. The assessment of corruption risks in the CO “CF “ADRA UKRAINE” is carried out by the Head. To assess corruption risks, other employees of the CO “CF “ADRA UKRAINE”, as well as independent experts or specialists may be involved.

2.4. The purpose of the corruption risk assessment is to prevent, identify, and eliminate corruption risks in the activities of the founders (members), Head, and employees of the CO “CF “ADRA UKRAINE”.

2.5. Corruption risks in the activities of the CO “CF “ADRA UKRAINE” are divided into internal and external.

The internal corruption risks are identified in organisational and management, financial and economic, HR and legal procedures of the activities of the CO “CF “ADRA UKRAINE”.

The external corruption risks are identified in the activity of business partners, including state authorities, local self-government bodies having business relations with the CO “CF “ADRA UKRAINE”.

2.6. Following identification of corruption risks, they shall be defined and described, classified by categories and types.

2.7. Based on the results of the assessment of corruption risks in the activities of the CO “CF “ADRA UKRAINE”, a written report is prepared, which should contain:

- ✓ identified corruption risks and causes thereof and conditions facilitating them;
- ✓ assessment of the identified corruption risks;
- ✓ proposed measures to prevent, eliminate (reduce) the level of the identified corruption risks.

The report is provided for the information of the employees of the CO “CF “ADRA UKRAINE” and may also be published on the official website of the CO “CF “ADRA UKRAINE”.

2.8. If, in the course of corruption risk assessment, the Head identifies a violation of this Policy or a corruption or corruption-related offence, he or she shall initiate and carry out an internal investigation.

2.9. Based on the results of the corruption risk assessment report, the Head and the founders (members) shall take the necessary measures to prevent, detect, and counteract corruption in the activities of the CO "CF "ADRA UKRAINE", including by amending existing anti-corruption standards and procedures.

3. Description of the anti-corruption standards and procedures of the CO "CF "ADRA UKRAINE":

3.1. With the aim of fostering an appropriate level of anti-corruption culture, the Head shall ensure that all new employees, as well as other persons acting on behalf of the CO "CF "ADRA UKRAINE" (including volunteers), undergo mandatory introductory training on the provisions of the Law, the Policy, and related documents.

3.2. Provisions on the mandatory compliance with the Policy shall be incorporated into the internal labour regulations of the CO "CF "ADRA UKRAINE", all employment agreements/contracts, and may also be included in agreements concluded by the CO "CF "ADRA UKRAINE".

3.3. Partners of the CO "CF "ADRA UKRAINE" are selected based on criteria that prioritise transparency of operations, competitiveness, quality of goods, works and services, and reliability.

3.4. The Head shall conduct an anti-corruption due diligence of existing or potential partners of the CO "CF "ADRA UKRAINE" to assess potential corruption risks. At the same time, the Head shall check whether the business partner has the reputation of an entity whose activities are related to corruption (even in the absence of relevant court decisions), and whether the business partner will be used as an intermediary for transferring undue benefit to third parties (or for receiving undue benefit from third parties).

The anti-corruption audit is carried out in accordance with the requirements of the Policy, as well as the standards of activity of the CO "CF "ADRA UKRAINE".

In case of a negative recommendation, the Head shall make a reasoned decision on such issue in order to continue or start legal relations with such business partner.

3.5. Charitable activities of the CO "CF "ADRA UKRAINE" shall not be permitted if:

- ✓ their implementation is a condition for entering into any agreement, making a decision by a state or local government authority, or is carried out with the aim of obtaining advantages in business activities;
- ✓ a partner, public authority, or local self-government body insists on carrying out a specific type of charitable activity through a particular charitable organisation.

3.6. The CO "CF "ADRA UKRAINE" shall not make contributions in support of political parties or movements.

VI. Standards of Professional Ethics of Employees and Volunteers of the CO "CF "ADRA UKRAINE"

1. Employees and volunteers of the CO "CF "ADRA UKRAINE" are obliged to strictly adhere to generally accepted ethical standards of behaviour in the performance of their duties.
2. Employees and volunteers of the CO "CF "ADRA UKRAINE" shall treat the political views, ideological and religious beliefs of others with tolerance and respect, and undertake not to use their powers in the interests of political parties or movements.
3. Employees and volunteers of the CO "CF "ADRA UKRAINE" shall act objectively, regardless of personal interests, personal attitudes toward any individuals, or their own political views, ideological, religious, or other personal beliefs or convictions.
4. Employees and volunteers of the CO "CF "ADRA UKRAINE" shall perform their functional duties, decisions, and assignments of the bodies and officials to whom they are subordinate, accountable, or under control diligently, competently, promptly, effectively, and responsibly, and shall not allow abuse or inefficient use of the funds and property of the CO "CF "ADRA UKRAINE".
5. Employees of the CO "CF "ADRA UKRAINE" shall not disclose or otherwise use confidential information obtained in the course of performing their duties, except in cases provided by law.

6. Employees of the CO “CF “ADRA UKRAINE” shall, regardless of their personal interests, refrain from executing decisions or instructions of the management of the CO “CF “ADRA UKRAINE” if such decisions or instructions pose a threat to the legally protected rights, freedoms or interests of individuals, legal entities, state or public interests, or contradict the law.
7. Employees of the CO “CF “ADRA UKRAINE” shall independently assess the legality of the decisions or instructions issued by management and the potential harm that may result from executing such decisions or instructions.

If an employee of the CO “CF “ADRA UKRAINE” receives a decision or instruction that they believe to be unlawful or to pose a threat to the legally protected rights, freedoms, or interests of individuals, legal entities, or to state or public interests, they must immediately inform the Head of the CO “CF “ADRA UKRAINE” or its founders (members) in writing.

VII. Rights and Obligations of Employees of the CO “CF “ADRA UKRAINE”

1. The management, employees, volunteers, and other persons acting on behalf of the CO “CF “ADRA UKRAINE” have the right to:
   - submit proposals for improving the Policy;
   - receive consultations on the implementation of the Policy and clarifications regarding its provisions.
2. The management, employees, and volunteers of the CO “CF “ADRA UKRAINE” are obliged to:
   - comply with the applicable requirements of the Law, the Policy, and related internal documents, and ensure the practical implementation of the Policy;
   - perform their direct duties in line with the mission of the CO “CF “ADRA UKRAINE”;
   - promptly inform the Head or the founders (members) of the CO “CF “ADRA UKRAINE” of any violations of the Policy (or any inducements to such violations), as well as of any acts of corruption or corruption-related offences committed by other employees of the CO “CF “ADRA UKRAINE” or by other individuals or legal entities with whom the CO “CF “ADRA UKRAINE” is or intends to be in a relationship;
   - immediately report, in accordance with the procedure set out in this Policy, the occurrence of a real or potential conflict of interest;
   - refrain from behaviour that may be perceived as a willingness to commit a corruption offence related to the activities of the CO “CF “ADRA UKRAINE”;
   - not commit or participate in committing any corruption-related offences in connection with the activities of the CO “CF “ADRA UKRAINE”.
3. Employees and the Head of the CO “CF “ADRA UKRAINE” are prohibited from:
   - using their official powers or position, and any related opportunities, to obtain undue benefits for themselves or others;
   - using any property or funds of the CO “CF “ADRA UKRAINE” for personal interests;
   - soliciting or receiving any material or non-material benefits (for themselves or for close persons) in connection with the performance of their official duties that are not stipulated by an employment or other agreement with the CO “CF “ADRA UKRAINE”;
   - organising, mediating, or personally conducting any cash or non-cash transactions or payments with business partners of the CO “CF “ADRA UKRAINE” that are not foreseen by applicable legislation;
   - directly or indirectly influencing decisions of other employees of the CO “CF “ADRA UKRAINE” in order to obtain any material or non-material benefit for themselves or for close persons that is not stipulated by an employment or other agreement with the CO “CF “ADRA UKRAINE”;
   - taking any actions that directly or indirectly incite other employees or the Head of the CO “CF “ADRA UKRAINE” to violate the requirements of the Law or the Policy;

- paying ransom, bribes, or other inducements.

4. After termination of employment or any other form of cooperation with the CO "CF "ADRA UKRAINE", individuals are prohibited from disclosing or otherwise using for their own benefit any (confidential) information obtained in connection with the performance of their duties or contractual obligations, except in cases provided by law.
5. The solicitation, request, or acceptance of gifts for themselves or for third parties from legal or natural persons by employees or the Head of the CO "CF "ADRA UKRAINE" (whether directly or through others) in connection with the performance of their duties or their position and related opportunities is not permitted.

Employees, volunteers, and the Head may accept gifts that are consistent with commonly accepted notions of hospitality (e.g. souvenirs, meals and drinks, invitations to entertainment events, reimbursement of travel and accommodation expenses), except as specified in clause 5 of this section, provided that the value of such gifts does not exceed one subsistence minimum for able-bodied persons as set on the date of receipt of the gift, and that the total value of such gifts received from the same person (or group of persons) during a year does not exceed two subsistence minimums for able-bodied persons as set on 1 January of the year in which the gifts are received.

The value restriction on gifts set out in this clause does not apply to gifts that:

- are given by close persons;
- are received as publicly available discounts on goods or services, publicly available winnings, prizes, awards, or bonuses.

6. In the event a gift that is prohibited from being accepted is discovered on the premises, or if a gift is offered, employees, volunteers, and the Head of the CO "CF "ADRA UKRAINE" shall, without delay and no later than the next business day, take the following actions:
   - decline the offer;
   - identify the person who made the offer, if possible;
   - involve witnesses, where feasible, including from among the staff of the CO "CF "ADRA UKRAINE";
   - report the offer in writing to the Head of the CO "CF "ADRA UKRAINE".

If any property suspected of being an undue advantage or a gift is discovered, an official report shall be drawn up and signed by the person who discovered the item and by the Head of the CO "CF "ADRA UKRAINE" or a person authorised to act on their behalf.

7. Employees, the Head, and other persons acting on behalf of the CO "CF "ADRA UKRAINE" shall refrain from offering gifts to public officials, Members of Parliament of Ukraine, members of local councils, their close relatives, actual or potential business partners, their employees or representatives, as well as from any other behaviour that may be perceived as willingness to engage in a corruption-related offence linked to the activities of the CO "CF "ADRA UKRAINE".
8. Gifts may be permitted in cases where they correspond to generally accepted notions of hospitality and their value does not exceed the amounts established by law.
9. The general policy of the CO "CF "ADRA UKRAINE" regarding the offering of gifts on behalf of the CO "CF "ADRA UKRAINE" in accordance with generally accepted hospitality practices shall be determined by the Head, taking into account the requirements of applicable legislation.

VIII. Surveillance and Control over Adherence to and Assessment of the Results of Measures Provided For by the Anti-Corruption Programme

1. The Head supervises and constantly monitors compliance with this Policy by employees and volunteers of the CO "CF "ADRA UKRAINE".
2. Oversight and control over compliance with the Policy shall be carried out in the following forms:

- reviewing and responding to reports of violations of the Policy or the commission of corruption or corruption-related offences;
- conducting internal assessments of corruption risks within the organisation's activities;
- performing reviews of organisational, legal, and financial documents, as well as their drafts.

3. If, during the oversight or control process, the Head identifies signs of a violation of the Policy or indications of a corruption or corruption-related offence, they shall initiate an internal investigation in accordance with the procedure established in Section XI of the Policy.

IX. Confidentiality Conditions for Reporting by Employees about Violations of Anti-Corruption Requirements

1. Employees of the CO "CF "ADRA UKRAINE" are guaranteed confidentiality when reporting to the founders (members) or the Head any identified signs of Policy violations, or acts of corruption or corruption-related offences committed by other employees of the CO "CF "ADRA UKRAINE", as well as when reporting instances of inducement of employees of the CO "CF "ADRA UKRAINE" to commit such offences.
2. Reports of identified signs of Policy violations or instances of inducement of employees of the CO "CF "ADRA UKRAINE" to commit corruption or corruption-related offences may be submitted verbally or in writing through the communication channels specified in this Policy.

Reports can also be made by employees and officials of business partners of the CO "CF "ADRA UKRAINE".

3. Submission of knowingly false reports is not allowed.
4. Reports of employees of the CO "CF "ADRA UKRAINE" on the detected signs of corruption or corruption-related offences may be anonymous.

An anonymous report on the detection of signs of corruption or corruption-related offences may be considered only if the information provided in it concerns a specific employee of the CO "CF "ADRA UKRAINE" or business partners of the CO "CF "ADRA UKRAINE" and contains factual data that can be verified.

5. The information set out in the report shall be verified by the Head or a person authorised by the Head or founders (participants).
6. Any data that makes it possible to identify the person, who has reported the incitement to commit a corruption or corruption-related offence or the detection of signs of violation of the requirements of the Policy, commitment of corruption or corruption-related offences by employees or other persons, belongs to confidential information and is protected in accordance with the law.

Persons involved in the review of information provided in a report are not permitted to disclose such information.

7. Any individual who becomes aware of, or suspects, corruption and/or fraud involving Personnel, Affiliated Persons, or beneficiaries must report the incident within 24 hours from the moment they became aware of, or ought to have become aware of, the misconduct, using the established feedback channels:
   - By e-mail:_____;
   - Via the online form on the website:_____;
   - By calling the hotline of the CO "CF "ADRA UKRAINE".
8. Reports submitted through the feedback channels listed in clause 1 of this section regarding corruption and/or fraudulent misconduct shall be reviewed within 24 hours.

9. In all cases where an incident of corruption/fraud is confirmed, the CO "CF "ADRA UKRAINE" is obliged to take prompt and decisive response measures to stop the unlawful act/omission and apply appropriate sanctions or accountability measures (e.g. suspension from duties, disciplinary action).

X. Procedures for Protecting the Employees Who Have Notified of the Corruption or Corruption-Related Offence

1. The Head shall, within the scope of their authority, provide conditions for the protection of persons who assist in preventing, detecting and countering corruption in the CO "CF "ADRA UKRAINE".
2. Information about an employee who has reported signs of a Policy violation or indications of a corruption or corruption-related offence (hereinafter the "whistleblower") shall not be disclosed, except in cases provided by law.
3. A whistleblower may not be dismissed or forced to resign, subjected to disciplinary action, or exposed to other negative consequences from management (such as transfer, evaluation, changes in working conditions, denial of promotion, reduction of salary, etc.), nor threatened with such consequences, due to their report of a violation of anti-corruption legislation and/or the requirements of the Policy.
4. In the event of a breach of confidentiality regarding the identity of a whistleblower, the Head of the CO "CF "ADRA UKRAINE" must take immediate action to prevent any negative consequences for the whistleblower resulting from such disclosure.

XI. Settlement of Conflicts of Interest in the Activities of Employees

1. Employees of the CO "CF "ADRA UKRAINE" shall, no later than the next business day from the date when they learned or should have learned about the existence of a real or potential conflict of interest, notify their immediate superior in writing, not take actions and not make decisions in conditions of a real conflict of interest and take measures to settle a real or potential conflict of interest.

In case an actual or potential conflict of interest is faced by the Head of the CO "CF "ADRA UKRAINE", they inform the founders (members) thereof in writing.

2. Within two working days after receiving a notification that a subordinate has a real or potential conflict of interest, the Head shall decide on the method of resolving the conflict of interest, notify the employee and take measures provided for by law to prevent and resolve the conflict of interest (including in case of self-detection of a conflict of interest by a subordinate without notification).
3. A conflict of interest shall be settled using one of the following measures:
   - removing the employee from performing a task, actions, decision-making or participation in decision-making;
   - introducing additional control over performance of the respective task, actions or decision-making by the employee;
   - restricting the employee's access to certain information;
   - reviewing the scope of the employee's functional duties;
   - transferring the employee to another position;
   - dismissing the employee.
4. Decisions on resolving a conflict of interest involving the Head of the CO "CF "ADRA UKRAINE" shall be made by the founders (members).
5. Employees of the CO "CF "ADRA UKRAINE" may independently take measures to resolve a conflict of interest by eliminating the relevant private interest and providing supporting documents to the Head. The elimination of the private interest must preclude any possibility of its concealment.

XII. Application of Disciplinary Measures to Employees

1. In the event of information indicating a possible violation of the Policy by an employee, the following measures shall be taken:
   - an internal investigation shall be initiated in accordance with the procedure established in Section XI of the Policy to confirm or refute the alleged violation;
   - if sufficient grounds are identified based on the results of the internal investigation, the Head shall impose a disciplinary sanction in accordance with the law.
2. Any losses or damages caused to the CO "CF "ADRA UKRAINE" as a result of corrupt or fraudulent practices, or other violations of this Policy, shall be reimbursed by the person who committed the violation in the manner prescribed by law.
3. Disciplinary sanctions shall be imposed on employees of the CO "CF "ADRA UKRAINE" by the Head in accordance with labour legislation.
4. Personnel, Affiliated Persons, and Beneficiaries may be held criminally liable in accordance with the Criminal Code of Ukraine for offences involving proven acts of corruption and fraud.
5. Oversight of compliance with this Policy, particularly with regard to the implementation of anti-corruption and anti-fraud measures, shall be exercised by:
   - Heads of relevant structural units and the President — with respect to employees working under regular employment contracts, volunteers, interns, and students undertaking practical training at the CO "CF "ADRA UKRAINE";
   - The General Meeting or the Supervisory Board — with respect to members of the governing bodies of the CO "CF "ADRA UKRAINE".

XIII. Procedure for Internal Investigations

1. In the event of receiving a report or identifying signs of the Policy violation by an employee of the CO "CF "ADRA UKRAINE" or indications of corruption or corruption-related offences committed by such employee of the CO "CF "ADRA UKRAINE", the Head shall take the measures provided for in clause 2 of this section.

   In the event of receiving a report or identifying signs of the Policy violation by the Head or indications of corruption or corruption-related offences committed by the Head, the founders (members) shall take the measures provided for in clause 2 of this section.
2. Under the conditions provided for by clause 1 of this section, the founders (members), the head shall take the following measures:
   - initiate the internal investigation in order to confirm or refute the information on the alleged violation of the Policy or corruption or corruption-related offence;
   - following the internal investigation, impose the disciplinary penalty on the guilty persons provided that there are adequate grounds;
   - following the internal investigation, decide on the ways to eliminate the reasons and implications of the violation, if any, and take preventive actions;
   - where signs of a corruption or corruption-related offence with administrative or criminal punishment are identified, immediately notify the competent anti-corruption authorities thereof.
3. The internal investigation shall only be conducted when the furnished or detected information is related to the specific persons and contains actual data that may be verified. The investigation shall not exceed seven days. The materials of internal investigations shall be kept in the archive of the CO "CF "ADRA UKRAINE" for no less than five years.

XIV. Amendments to This Policy

1. The Head of the CO “CF “ADRA UKRAINE” shall ensure the organisation of feedback mechanisms and other internal processes aimed at supporting and continuously improving this Policy.
2. Amendments to this Policy may be initiated by the founders (members), the Head (executive body), or employees of the CO “CF “ADRA UKRAINE”.
3. Once a year, the Head of the CO “CF “ADRA UKRAINE” shall collect and consolidate proposals for amendments to this Policy and provide recommendations on whether such proposals should be accepted or rejected.
4. The Head of the CO “CF “ADRA UKRAINE”, having received proposals for amendments to this Policy, initiates an open discussion by employees and founders (members).
5. Amendments to this Policy may not establish standards or requirements that are lower than those provided by the Law of Ukraine “On Prevention of Corruption” and the currently approved Policy of the CO “CF “ADRA UKRAINE”.

ПРОТОКОЛ № 1
НАГЛЯДОВОЇ РАДИ
БЛАГОДІЙНОЇ ОРГАНІЗАЦІЇ «БЛАГОДІЙНИЙ ФОНД «АДВЕНТИСТСЬКЕ АГЕНТСТВО ДОПОМОГИ ТА РОЗВИТКУ В УКРАЇНІ»

м. Київ, вул. Лук'янвська, 9/10А «05» червня 2025 року

11:00 за Київським часом

Присутні:
- Кривой Віталій Вікторович, голова Наглядової Ради (головуючий на засіданні);
- Велечук Володимир Стефанович, член Наглядової ради;
- Проданюк Роман Олексійович, член Наглядової ради;
- Бойко Микола Олексійович, член Наглядової ради;
- Лавренюк Василь Іванович, член Наглядової ради;
- Зайцев Олександр Анатолійович, член Наглядової ради;
- Самойленко Віктор Володимирович, член Наглядової ради;
- Вертило Лев Пантелійович, член Наглядової ради;
- Ващінін Олександр Іванович, член Наглядової ради;
- Поправкін Дмитро Миколайович, член Наглядової ради;
- Чопик Василь Юрійович, член Наглядової ради;
- Бондаренко Юрій Олександрович, член Наглядової ради;
- Кампен Костянтин Степанович, член Наглядової ради;
- Шевчук Андрій Васильович, член Наглядової ради;
- Крупський Максим Володимирович, член Наглядової ради.

Запрошені: Леонід Рутковський, президент БО «БФ «АДРА УКРАЇНА».

ВІДКРИТТЯ ЗАСІДАННЯ

Надійшла пропозиція розпочати засідання.
На засіданні присутні 15 (п'ятнадцять) із 15 членів Наглядової ради. Кворум наявний.

Віталій Кривой оголосив присутніх на засіданні та запрошених.

Віталій Кривой оголосив перелік питань проекту порядку денного:
1. Про обрання секретаря засідання Наглядової ради.
2. Про затвердження Політики захисту даних.
3. Про затвердження Політики з питань убезпечення.
4. Про затвердження Політики щодо розкриття інформації.
5. Про затвердження Політики щодо запобігання корупції та шахрайським діям.
6. Про затвердження Положення щодо визначення та вирішення конфлікту інтересів.
7. Про затвердження Політики щодо медіа та комунікацій.

ВИРІШИЛИ:
Прийняти порядок денний за основу.

ГОЛОСУВАННЯ:
За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

Обговорення питань порядку денного

1. Про обрання секретаря засідання Наглядової ради.

СЛУХАЛИ: Віталія Кривого, який запропонував обрати секретарем засідання Наглядової ради Олександра Ващініна.

ВИРІШИЛИ: Обрати секретарем засідання Наглядової ради - Олександра Ващініна.

ГОЛОСУВАННЯ:
За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

2. Про затвердження Політики захисту даних.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Політику захисту даних в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Політику захисту даних в БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:
За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

3. Про затвердження Політики з питань убезпечення.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Політику з питань убезпечення в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Політику з питань убезпечення БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:
За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**
РІШЕННЯ ПРИЙНЯТО.

4. Про затвердження Політики щодо розкриття інформації.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Політику щодо розкриття інформації в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Політику щодо розкриття інформації в БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:
За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

5. Про затвердження Політики щодо запобігання корупції та шахрайським діям.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Політику щодо запобігання корупції та шахрайським діям в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Політику щодо запобігання корупції та шахрайським діям в БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:
За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

6. Про затвердження Положення щодо визначення та вирішення конфлікту інтересів.

СЛУХАЛИ: Віталія Кривого, який запропонував затвердити Положення щодо визначення та вирішення конфлікту інтересів в БО «БФ «АДРА УКРАЇНА».

ВИРІШИЛИ: Керуючись Статутом БО «БФ «АДРА УКРАЇНА» та Рішенням Засновника БО «БФ «АДРА УКРАЇНА» від 20.11.2024 р., № 49, затвердити Положення щодо визначення та вирішення конфлікту інтересів в БО «БФ «АДРА УКРАЇНА».

ГОЛОСУВАННЯ:
За – 15 (Кривой В., Велечук В., Проданюк Р., Бойко М., Лавренюк В., Зайцев О., Самойленко В., Вертило Л., Ващінін О., Поправкін Д., Чопик В., Бондаренко Ю., Кампен К., Шевчук А., Крупський М.), **Проти – 0, Утрималися – 0.**

РІШЕННЯ ПРИЙНЯТО.

Голова Наглядової ради закрив засідання.

Додатки:
1. Політика захисту даних.
2. Політика з питань убезпечення.
3. Політика щодо розкриття інформації.
4. Політика щодо запобігання корупції та шахрайським діям.
5. Положення щодо визначення та вирішення конфлікту інтересів.

Голова Наглядової ради **Віталій КРИВОЙ**

Секретар Наглядової ради **Олександр ВАЩІНІН**