POLTAVA UNIVERSITY OF ECONOMICS AND TRADE

Educational and Scientific Center for Quality Assurance in Higher Education
Quality management system

ENACTED
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Poltava University of Economics and Trade
No. 120-H dated 30 June 2023

Rector

_____ Oleksiy NESTULYA

APPROVED
By the decision of the Academic Council
Poltava University of Economics and Trade
Protocol No. 9 dated 30 June 2023

Chairman of the Academic Council

_____ Oleksiy NESTULYA

ANTI-CORRUPTION PROGRAM POLTAVA UNIVERSITY OF ECONOMICS AND TRADE

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PREFACE

1. SUBMITTED BY THE FIRST VICE-RECTOR OF PUET

Pedchenko Nataliia, Doctor of Economics, Professor

2. DEVELOPERS: First Vice-Rector **Pedchenko Nataliia**, Doctor of Economics, Professor

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Signature				
Last name, initials	*Vergal K.Yu.*	*Hasii O.V.*	*Hasii O.V.*	

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Preamble (values)

This Anti-Corruption Program (hereinafter referred to as the Program)Poltava University of Economics and Trade (hereinafter referred to as the University) being aware of its responsibility for upholding the values of the rule of law and integrity, striving to ensure its sustainable development, caring for its own business reputation, to encourage the use of fair commercial practices, as well as in the interests, in particular, but not exclusively, of its founders, employees, higher education students, business partners declares that its Rector, Academic Council, Heads of the structural units and employees in their activities, as well as in legal relations with business partners, state authorities, local self-government bodies, other legal entities and individuals are guided by the principle of zero tolerance to corruption in any of its forms and manifestations and take and will take all measures to prevent, detect and combat corruption, provided for by the Law and this Program.

The University declares its principled position and condemns corruption as an illegal and unethical way of conducting business.

I. General provisions

1. Definitions and abbreviations

1.1. In this Program, the following terms are used with the following meanings:

Charitable activity - voluntary personal and/or property assistance aimed at promoting the legitimate interests of recipients of charitable assistance in areas of charitable activity defined by law, which does not involve the receipt of profit by the University, as well as the payment of any remuneration or compensation to the University on behalf of the charitable assistance recipient.

Whistleblower - an individual who, having the belief that the information is reliable, reports possible facts of corruption or corruption-related offenses, other violations of this Law committed by another person, if such information has become known in connection with his labor, professional, economic, public, scientific activities, his service or training, or his participation in procedures provided for by the Law that are mandatory for the commencement of such activities, service or training.

Contribution to support a political party - cash or other property, benefits, privileges, services, loans (credits), intangible assets, any other benefits of intangible or non-monetary nature, sponsorship by the University of events or other activities in support of the party, goods, works, services provided by the University free of charge or on preferential terms (at a price lower than the market value of identical or similar works, goods and services in the relevant market) received by a political party or its local organization, which in accordance with the established procedure has acquired the status of a legal entity.

Business hospitality - representative events (for example, business breakfasts, lunches, dinners, buffets, tastings, other events (conferences, cultural and sporting events)), reimbursement of travel expenses, accommodation, other types of expenses

incurred by or in relation to the University for the purpose of establishing or developing business relationships or for any other purpose related to the activities of the University.

Business relationships - relationships between the University and a business partner related to the business, professional or economic activities of the University, arising on the basis of a transaction or the implementation of other activities by the University and provide for the duration of their existence after their establishment.

Business partners are legal entities and/or individuals with whom the University maintains, enters into, or intends to enter into business relationships.

Incentive payments - unofficial and illegal payments to officials for the purpose of facilitating/expediting/simplifying or, in certain cases, the proper execution of procedures established by law, which the University has the legal right to receive without making such payments.

Corruption offense - an act containing signs of corruption, committed by a person and specified in Part 1 of Article 3 of the Law of Ukraine "On the Prevention of Corruption", according to which the law establishes criminal, disciplinary and/or civil liability.

Corruption risk - the probability of committing a corruption or corruption-related offense, or other violation of the Law of Ukraine "On Prevention of Corruption", which will negatively affect the activities of the University.

Corruption - the use by a person specified in Part 1 of Article 3 of the Law of Ukraine "On the Prevention of Corruption" of the granted official powers or the opportunities related thereto for the purpose of obtaining an unlawful benefit or accepting such a benefit or accepting a promise/offer of such a benefit for himself or other persons or, respectively, a promise/offer or provision of an unlawful benefit to a person specified in Part 1 of Article 3 of this Law, or at one’s request to other individuals or legal entities for the purpose of inducing this person to unlawfully use the granted official powers or the opportunities related thereto.

Unlawful benefit - money or other property, advantages, privileges, services, intangible assets, any other benefits of an intangible or non-monetary nature that are promised, offered, given or received without lawful grounds.

Zero tolerance for corruption - absolute intolerance to corruption in any of its manifestations.

Gift - cash or other property, benefits, privileges, services, intangible assets that are provided/received free of charge or at a price below the minimum market price.

Potential conflict of interest - the presence of a private interest in the area in which a person exercises his official or representative powers, which may affect the objectivity or impartiality of his decision-making, or the commission or non-commission of actions in the exercise of these powers.

Corruption-related offense - an act that does not contain signs of corruption, but violates the requirements, prohibitions and restrictions established by this Law, committed by a person specified in Part 1 of Article 3 of the Law of Ukraine "On the Prevention of Corruption", for which the law establishes criminal, administrative,

disciplinary and/or civil liability.

A real conflict of interest is a contradiction between a person's private interest and his official or representative powers, which affects the objectivity or impartiality of decision-making, or the commission or non-commission of actions in the exercise of these powers.

University employees include scientific and pedagogical staff, teaching and support staff, administrative and service staff, and business staff.

Sponsorship activities (sponsorship) - voluntary material, financial, organizational and other support by the University of any event or activity with the aim of popularizing the name of the University, trademarks for the University's goods and services.

University – Poltava University of Economics and Trade.

1.2. Other terms used in this Program have the meanings given in the Law of Ukraine "On the Prevention of Corruption".

2. Purpose and scope of application

2.1. The purpose of this Program is to ensure the functioning of an effective system for preventing and combating corruption, and compliance of the University's activities with the requirements of anti-corruption legislation taking into account best international practices.

2.2. This Program establishes a set of measures (rules, standards and procedures) to prevent, detect and combat corruption in the activities of the University, no less in scope and content than those provided for by the Law of Ukraine "On Prevention of Corruption" and the Standard Anti-Corruption Program of a Legal Entity, approved by order of the National Agency for the Prevention of Corruption.

2.3. Measures to prevent, identify, and eliminate or minimize corruption risks are recognized as priorities in the University's activities.

2.4. This Program is mandatory for implementation by the Rector, Academic Council, and Heads of structural units, employees, and higher education students of the University.

2.5. This Program is mandatory for all business entities (subsidiaries, separate divisions, branches, and representative offices) over which the University exercises control.

2.6. This Program applies to all areas of the University's activities, including relations with business partners, officials, state authorities and local governments, and other legal entities and individuals.

2.7. The provisions on the mandatory observance and implementation of this Program are approved by order of the Rector of the University and are included in all contracts with scientific and pedagogical employees.

2.8. This Program has been put into effect by order of the Rector of the University after its approval by the Academic Council of the University.

2.9. The text of this Program is available in constant open access for higher education applicants, employees, heads of structural units, the administration, as well as for its business partners on the University's website in the "Prevention and Counteraction to Corruption" tab (http://puet.edu.ua/uk/zapobigannya-ta-protidiya-korupciyi).

3. Responsible leadership, business reputation and integrity

3.1. The Rector, Academic Council, and Heads of structural units of the University take on the obligation to establish zero tolerance for corruption among University employees by setting a personal example of ethical behavior, which is the basis of the University's business culture, everyday business practices, and business reputation.

3.2. The Rector and the Academic Council of the University undertake to demonstrate leadership and responsibility regarding:

3.2.1. 3.2.1. compliance with the requirements of anti-corruption legislation;

3.2.2. ensuring proper implementation, effective functioning, periodic analysis, timely review and improvement of the system for preventing and combating corruption at the University in order to properly respond to corruption risks in the University's activities;

3.2.3. spreading a culture of zero tolerance for corruption in all areas of the University's activities;

3.2.4. appointment to the position of a person responsible for the implementation of this Program (the Commissioner for the Prevention and Detection of Corruption, hereinafter referred to as the Commissioner), providing him with appropriate organizational working conditions, facilitating the Commissioner's performance of the tasks and functions provided for by the Law of Ukraine "On the Prevention of Corruption" and this Program, ensuring the independence of the Commissioner's activities;

3.2.5. encouraging officials at all levels to demonstrate leadership in preventing and combating corruption within the scope of their authority;

3.2.6. directing employees to support the University's anti-corruption policy and make a personal contribution to the effectiveness of the system for preventing and combating corruption;

3.2.7. informing about the policy of preventing and combating corruption both within the University and in relations with business partners, officials, state authorities, local governments, and other legal entities and individuals;

3.2.8. ensuring, in accordance with the Law of Ukraine "On Prevention of Corruption", conditions for reporting information about possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine "On Prevention of Corruption";

3.2.9. compliance with the rights and guarantees of protection of whistleblowers provided for by the Law of Ukraine “On the Prevention of Corruption”;

3.2.10. timely and appropriate response in accordance with the law to the facts of commission (possible commission) of corruption or corruption-related offenses by members of the University's governing bodies, officials of all levels, and employees.

4. Norms of professional ethics

4.1. The Rector, Academic Council, Heads of structural units of the University, the Commissioner and employees while performing their official (contractual) duties:

4.1.1. strictly adhere to generally recognized ethical norms of behavior and the requirements of the Regulations on Corporate Culture of the Poltava University of Economics and Trade;

4.1.2. treat the political views, ideological and religious beliefs of others with tolerance and respect;

4.1.3. act regardless of personal interests, personal attitude towards any persons, or their political, ideological, religious or other personal views or beliefs;

4.1.4. do not disclose or use confidential information that has become known to them in connection with the performance of their official (contractual) duties, except in cases established by law;

4.1.5. competently, timely, effectively and responsibly perform official (contractual) duties, decisions and instructions of bodies and officials to whom they are subordinate, accountable or controlled, and do not allow abuse and ineffective use of University funds and property.

4.2. The Rector, the Academic Council, Heads of structural units of the University, the Commissioner and employees shall refrain from clearly criminal actions, decisions and instructions and shall take measures to cancel such decisions and instructions.

4.3. Heads of structural units of the University, the Commissioner, and employees are obliged to refrain from implementing decisions or instructions of management that are clearly criminal.

4.4. In the event of receiving decisions or instructions that are clearly criminal, the Head of a structural unit of the University, the Commissioner, or the employee must immediately notify the immediate supervisor or the Rector of the University, or its founders (participants) and the Commissioner of this in writing.

4.5. The Head of a structural unit, the Commissioner, or an employee may not be dismissed or forced to be dismissed, brought to disciplinary responsibility or subjected to other negative measures of influence or the threat of such measures of influence by management in connection with their refusal to carry out decisions or instructions that are clearly criminal.

4.6. Heads of structural units, University employees and the Commissioner may not be subject to disciplinary action for refusing to participate in corrupt

activities, even if such refusal may result in the University losing a competitive advantage or potential benefit.

II. Rights, obligations, prohibitions

1. Rights and obligations of the Rector, the Academic Council, Heads of structural units, employees (except the Commissioner)

1.1. The Rector of the University, the Academic Council, Heads of structural units and employees have the right:

1.1.1. provide suggestions for improving this Program;

1.1.2. contact the Commissioner for consultations and clarifications regarding the implementation of this Program, other internal documents of the University regarding the prevention of corruption, and anti-corruption legislation;

1.1.3. receive recommendations from the Commissioner on further actions if planned actions or decisions (transactions) may be a source of corruption risks.

1.2. The Rector of the University, the Academic Council, Heads of structural units and employees are obliged to:

1.2.1. comply with the requirements of the Law of Ukraine "On the Prevention of Corruption", this Program and internal documents adopted for its implementation, as well as ensure the implementation of this Program;

1.2.2. perform their official (contractual) duties taking into account the legitimate interests of the University;

1.2.3. immediately inform the Commissioner or the Rector of the University, in accordance with the procedure provided for by this Program, about cases of violation of the requirements of this Program (or about cases of incitement to such actions), commission of corruption or corruption-related offenses, other violations of the Law of Ukraine "On the Prevention of Corruption" by the Rector, Academic Council, Heads of structural units, employees of the University, or existing or potential business partners;

1.2.4. immediately inform in the manner prescribed by this Program about the occurrence of a real or potential conflict of interest; take measures to prevent and resolve a real or potential conflict of interest; do not take actions or make decisions in conditions of a real conflict of interest;

1.2.5. refrain from behavior that may be perceived as a willingness to commit a corruption or corruption-related offense related to the activities of the University;

1.2.6. inform the Commissioner about the provision and acceptance of business hospitality, giving and receiving gifts in the manner determined by the University;

1.2.7. take into account and pay attention to the recommendations of the Commissioner.

2. Prohibited corrupt practices

2.1. The Rector of the University, the Academic Council, Heads of structural units, the Commissioner and employees are prohibited from:

2.1.1. accepting an offer, promising or receiving an improper benefit, as well as requesting such benefit for themselves or another individual or legal entity for committing or failing to commit any actions using the position they hold at the

University, or in connection with their activities for the benefit of the University, in the interests of the person who offers, promises or provides such benefit, or in the interests of a third party;

2.1.2. abusing their powers, that is, intentionally, in order to obtain an improper benefit for themselves or another individual or legal entity, using their powers contrary to the interests of the University;

2.1.3. offering, promising or providing (directly or through a third party) to officials and/or their relatives, other individuals, an improper benefit for their commission or failure to commission any actions/inaction using the power, official position, or authority granted to them to obtain or retain any benefits for the University;

2.1.4. taking actions and making decisions in conditions of real conflict of interest;

2.1.5. using any University property or funds for personal gain;

2.1.6. organizing, being an intermediary or personally makintg any cash or non-cash payments or settlements with the University's business partners, other individuals or legal entities, unless such payments or settlements are provided for by law or transactions concluded by the University;

2.1.7. directly or indirectly influencing the decisions of University employees in order to obtain improper benefit for themselves or others;

2.1.8. taking any actions that directly or indirectly incite other employees, officials of all levels to violate the requirements of the Law of Ukraine "On the Prevention of Corruption" or this Program;

2.1.9. giving and receiving gifts in violation of the requirements of the law and this Program regarding the provision and acceptance of business hospitality and gifts;

2.1.10. after dismissal or other termination of cooperation with the University, disclosing or otherwise using in one’s own interests information, including confidential information, which became known to them in connection with the performance of their powers and contractual obligations, except for cases established by law.

2.2. The University prohibits the payment of incentive payments to officials, in particular for the purpose of accelerating any formal procedures related to obtaining permits or making relevant decisions in favor of the University, or obtaining other benefits for the University.

A payment for expedited consideration paid to the account of a state authority or local government body, enterprise, institution, organization, official, state/local budget, the amount and payment of which is provided for by law (for example, a payment for expedited patent registration) is not an incentive payment.

The Head of a structural unit or employee, to whom a request for an incentive payment is made, is obliged to notify the person making such a request of the prohibition of its implementation and refuse to make such a payment, and is to immediately inform his immediate supervisor and the Commissioner about the received request.

If a Head of a structural unit or an employee has any doubt as to whether a payment is an incentive payment and whether it is prohibited, such Head or employee must seek advice from the Commissioner.

2.3. The prohibitions shall apply without any territorial restrictions, on the territory of any State, regardless of national traditions, local practices or conditions of competition prevailing in that State.

III. Legal status of the Commissioner and his subordinate employees

1. General provisions

1.1. The legal status of the Commissioner is determined by the Law of Ukraine "On the Prevention of Corruption" and the given Program.

The Commissioner is appointed by the Rector of the University.

The authorized person is subordinate, accountable and controlled by the Rector of the University.

The requirements for a person who may be appointed as a Commissioner are established by the Law of Ukraine "On the Prevention of Corruption".

1.2. The Commissioner may be dismissed from office early in cases stipulated by the Law of Ukraine "On the Prevention of Corruption".

The Commissioner may be dismissed from office at the initiative of the Rector of the University.

1.3. The Commissioner may involve other University employees in the performance of his/her functions (with the consent of the University Rector) by providing them with oral and written instructions and monitoring their implementation.

2. Duties and rights of the Commissioner

2.1. Responsibilities of the Commissioner:

2.1.1. perform their duties impartially;

2.1.2. organize the preparation, develop and submit to the Rector for approval the internal documents of the University on the formation and implementation of this Program;

2.1.3. organize periodic assessments of corruption risks in the activities of the University;

2.1.4. ensure interaction and coordination between structural units of the University regarding the preparation, implementation and control over the implementation of measures provided for by this Program;

2.1.5. provide the Rector of the University, the Academic Council, Heads of structural units, employees, and higher education applicants with explanations and individual consultations related to the implementation of this Program and compliance with the requirements of anti-corruption legislation;

2.1.6. provide University employees and higher education students with methodological assistance and consultations on reporting possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine "On the Prevention of Corruption" and protection of whistleblowers, and conduct training on these issues;

2.1.7. ensure that the public is informed about the measures taken by the University to prevent corruption;

2.1.8. organize training events for University employees on preventing and combating corruption;

2.1.9. improve their qualification, initiate questions about their professional training (advanced training) with the Rector of the University, if possible;

2.1.10. take measures to identify a conflict of interest and facilitate its resolution, inform the Rector of the University about the identification of a conflict of interest and the measures taken to resolve it;

2.1.11. participate in the University's personnel selection procedures, in particular by initiating, organizing, and conducting checks of candidates for positions;

2.1.12. check for the presence of corruption risks and approve (sign off) draft organizational and administrative documents and transactions of the University;

2.1.13. organize the work of internal channels for reporting possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine "On the Prevention of Corruption";

2.1.14. receive and organize the consideration and verification of reports on possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine "On the Prevention of Corruption";

2.1.15. participate in internal investigations conducted under this Program;

2.1.16. inform the Rector of the University about facts that may indicate the commission of corruption or corruption-related offenses and other violations of the requirements of the Law of Ukraine "On the Prevention of Corruption" by the Academic Council of the University, Heads of structural units,employees;

2.1.17. in the event of detecting a corruption or corruption-related offense or receiving a notification of such an offense, the Academic Council of the University, Heads of structural units, and employees of the University shall take measures to stop such an offense;

2.1.18. organize work and participate in an official investigation conducted to identify the causes and conditions that have led to the commission of a corruption or corruption-related offense or failure to comply with the requirements of the Law of Ukraine "On the Prevention of Corruption";

2.1.19. cooperate with whistleblowers, ensure compliance with their rights and guarantees of protection provided for by the Law of Ukraine “On the Prevention of Corruption”;

2.1.20. inform whistleblowers about their rights and obligations stipulated by the Law of Ukraine "On the Prevention of Corruption", as well as about the status and results of the consideration, verification and/or investigation of the information reported by them;

2.1.21. ensure the formation and maintenance of registers:

— University employees held liable for violating the requirements of this Program, committing a corruption offense or an offense related to corruption, or other violations of the Law of Ukraine "On the Prevention of Corruption";

— business partner due diligence, candidate due diligence, and merger and acquisition due diligence conducted under this Program;

— internal investigations conducted under this Program;

— reports of a conflict of interest, commission of a corruption offense or an offense related to corruption, other violation of the Law of Ukraine "On the Prevention of Corruption", violation of the requirements of this Program;

— business hospitality and gifts;

2.1.22. ensure supervision, control and monitoring of compliance with this Program and anti-corruption legislation;

2.1.23. to evaluate the results of the implementation of measures provided for in this Program;

2.1.24. ensure the preparation of a report on the status of implementation of this Program;

2.1.25. participate in cooperation with state authorities, local governments, other legal entities, non-governmental and/or international organizations on corruption prevention issues;

2.1.26. perform other official duties stipulated by the Law of Ukraine "On the Prevention of Corruption", this Program, internal documents of the University adopted in implementation of the Law of Ukraine "On the Prevention of Corruption" and this Program, in particular those aimed at considering whistleblowers' reports and ensuring compliance with their rights and guarantees of protection.

2.2. Rights of the Commissioner:

2.2.1. receive oral and written explanations from members of the Academic Council, Heads of structural units, employees and higher education applicants regarding circumstances that may indicate a violation of the requirements of the Law of Ukraine "On the Prevention of Corruption" and this Program regarding the prevention and resolution of conflicts of interest and other stipulated requirements, restrictions and prohibitions, as well as on other issues related to the implementation of this Program;

2.2.2. summon and question persons whose actions or inactions relate to the facts reported by the whistleblower, including Heads of structural units of the University, members of the Academic Council;

2.2.3. have, subject to the restrictions established by law, access to documents and information held by the University that are necessary to perform its duties, make or receive copies of them;

2.2.4. request from other structural units of the University information, documents or copies thereof, including those containing information with restricted access (except state secrets), which are necessary to fulfill the duties assigned to it;

2.2.5. process information, including personal data, in compliance with the legislation on access to personal data;

2.2.6. gain access to warehouse, production and other premises of the University if necessary to carry out anti-corruption measures;

2.2.7. access the University's electronic means of storing and processing data necessary to perform the duties assigned to it, and if necessary, to request the execution of the relevant data on paper;

2.2.8. sign and send letters to the National Agency for the Prevention of Corruption or other specially authorized entities in the field of combating corruption with reports of corruption or corruption-related offenses, other violations of the Law of Ukraine "On the Prevention of Corruption";

2.2.9. contact the National Agency for Corruption Prevention regarding the violated rights of the whistleblower and his/her relatives;

2.2.10. exercise other powers specified by the Law of Ukraine "On the Prevention of Corruption" aimed at comprehensively considering reports of corruption or corruption-related offenses and other violations of the requirements of the Law of Ukraine "On the Prevention of Corruption" including reports of whistleblowers, and protecting their rights and freedoms;

2.2.11. initiate inspections on the grounds provided for by the Law of Ukraine "On the Prevention of Corruption" and this Program;

2.2.12. initiate internal investigations in connection with a possible violation of the Law of Ukraine "On the Prevention of Corruption" and this Program;

2.2.13. submit a proposal to the Rector of the University to bring to disciplinary responsibility persons guilty of violating the Law of Ukraine "On the Prevention of Corruption" and this Program;

2.2.14. participate in meetings of working groups and commissions of the University on issues within the competence of the Commissioner;

2.2.15. initiate meetings on the prevention and detection of corruption, implementation of this Program;

2.2.16. involve University employees in the performance of their powers with the consent of the University Rector;

2.2.17. submit proposals for the consideration of the University Rector to improve the work of the Commissioner;

2.2.18. contact the Rector, the Academic Council of the University on issues related to the exercise of their powers and the performance of official duties;

2.2.19. other rights provided for by the Law of Ukraine "On the Prevention of Corruption", this Program, and other internal documents of the University.

3. Guarantees of independence

3.1. The Commissioner shall exercise his/her functions at the University independently. Interference in the activities of the Commissioner by the University Rector, Academic Council, heads of structural divisions, employees, higher education applicants, business partners of the University, as well as other persons is not permitted.

3.2. Intervention should be understood as:

3.2.1. refusal to provide the Commissioner with information, documents, access to information and documents that the Commissioner has the right to receive;

3.2.2. any influence on the decision-making and actions of the Authorized Person, which is carried out outside the powers of the Academic Council/Heads of

structural units that exert influence, provided for by the legislation, the University's charter, the Academic Council's decisions or internal documents of the University;

3.2.3. actions/inaction that cause restrictions or violations of the Commissioner's rights (for example, unjustified refusal to provide annual leave according to the schedule; unjustified refusal to send for training/improvement of qualifications provided for by the relevant plan-schedule; unjustified limitation of the amount or non-payment of incentive and compensation payments provided for by labor and collective agreements, etc.);

3.2.4. actions/inaction that impede the performance of official duties by the Commissioner (for example, unjustified sending the Commissioner on a business trip away from the workplace; unjustified deprivation of the Commissioner of access to the workplace, personal computer; unjustified seizure of documents stored by the Commissioner; failure to provide the Commissioner with material resources necessary to perform the tasks assigned to him, failure to provide access to the University's office management system, means of communication, etc.);

3.2.5. assigning duties to the Commissioner, providing instructions on issues that do not belong to or go beyond his power, as defined by the Law of Ukraine "On the Prevention of Corruption" and this Program, and restricting performance of his official duties.

3.3. The Commissioner may not be dismissed or forced to resign, held disciplinary accountable, or subjected by the Rector or the Academic Council of the University to other negative measures of influence (transfer, certification, change of working conditions, refusal to appoint to a higher position, reduction of salary, refusal to extend the employment contract, etc.) or the threat of such measures of influence in connection with the implementation of anti-corruption measures, the detection and reporting of possible facts of corruption or corruption-related offenses, or other violations of the Law of Ukraine "On the Prevention of Corruption".

Negative measures of influence also include formally lawful decisions and actions of the Rector, the Academic Council of the University, which are selective in nature, in particular, they are not applied to other employees, managers in similar situations and/or have not been applied to the Commissioner in similar situations (under similar circumstances) before.

3.4. The suspension of the Commissioner from performing his duties is carried out by the Rector of the University.

3.5. In the event of a violation of the guarantees of independence, the Commissioner shall notify the Founder of the University and, if necessary, the National Agency for the Prevention of Corruption.

3.6. The Rector, the Academic Council of the University, and Heads of structural divisions of the University are obliged to:

3.6.1. ensure the independence of the Commissioner;

3.6.2. provide the Commissioner with appropriate material and organizational working conditions (a separate office, a safe for storing documents, a workplace equipped with office furniture, computer equipment and organizational equipment,

access to the Internet, stationery, communication equipment, an email account) and sufficient resources to perform the tasks assigned to him/her;

3.6.3. assist the Commissioner in fulfilling the tasks stipulated by the Law of Ukraine "On the Prevention of Corruption" and this Program; at the request of the Commissioner, provide information and documents necessary to fulfill the duties assigned to him, facilitate internal investigations, ensure the involvement of employees/resources for the Commissioner to fulfill his duties;

3.6.4. respond within a reasonable time to written and oral appeals, proposals and recommendations of the Commissioner provided by him within the framework of the implementation of this Program.

IV. Corruption Risk Management

1. To effectively prevent corruption in its activities, the University applies a risk-oriented approach and creates a risk management system, which involves regularly assessing corruption risks that may impact the activities of the University, taking measures necessary and sufficient to eliminate or minimize them, and further monitoring and controlling the external environment of the University.

2. The University carries out periodic assessment of corruption risks in its activities, the purpose of which is to:

2.1. identify internal and external corruption risks in the University's business processes;

2.2. assess the adequacy, appropriateness and effectiveness of existing measures to adequately prevent, eliminate or minimize identified corruption risks;

2.3. analyse and assess (determine levels) of identified corruption risks;

2.4. determine by priority high-risk business processes, taking into account the nature and degree of vulnerability of business processes to corruption risks, levels of assessed corruption risks;

2.5. develop of measures to effectively eliminate or minimize corruption risks in the activities of the University.

3. The Commissioner organizes the periodic assessment of corruption risks in the activities of the University.

4. The University may carry out internal and/or external assessments of corruption risks.

Internal assessments of corruption risks are carried out by a working group formed from representatives of the University's structural divisions.

External assessments of corruption risks are carried out by audit, legal, consulting companies or independent experts engaged by the University.

5. The University assesses corruption risks in its activities at least once every 2 years.

6. The University may decide to conduct a corruption risk assessment according to the procedure specified by law.

7. Based on the results of the assessment of corruption risks in the University's activities, risks are identified, the probability of their occurrence and consequences are assessed, and measures are developed to eliminate them.

8. The authorized person reports on the results of the assessment of corruption risks in the activities of the University to the Academic Council.

9. The Rector of the University approves the report on the results of the assessment of corruption risks in the activities of the University and ensures the implementation of the measures envisaged by it, including by updating existing anti-corruption measures, and allocates the necessary resources for this.

10. The report on the results of the assessment of corruption risks in the University's activities is published on the University's website.

11. The Commissioner monitors the implementation of measures to eliminate or minimize identified corruption risks, prepares and submits reports on the status of implementation of measures in the manner and within the time limits specified in this Program.

V. **Educational activities**

1. Periodic training on corruption prevention and detection

1.1. In order to form an appropriate level of anti-corruption culture, the Commissioner, together with the Human Resources Department, ensures the organization of mandatory familiarization with the provisions of the Law of Ukraine "On the Prevention of Corruption", this Program and the internal documents of the University adopted for its implementation for newly appointed employees and applicants for higher education at the University.

1.2. The University ensures proper and sufficient communication of the provisions of this Program and internal documents of the University in the field of preventing and combating corruption, changes in anti-corruption legislation and the practice of its application to all employees, higher education students and business partners of the University through information (communications).

1.3. The Commissioner is responsible for providing information on the prevention and detection of corruption.

1.4. Whenever possible, the University provides periodic advanced training (training) for the Rector, the Academic Council, and the Commissioner.

1.5. Planned anti-corruption training for Heads of structural units of the University, employees, and higher education students is carried out in accordance with the thematic plan-schedule approved by the Rector of the University for each year which is prepared by the Commissioner.

1.6. Anti-corruption training programs are implemented both remotely and in person.

1.7. The topics and form of educational events (seminars, lectures, workshops, trainings, individual lessons, webinars, etc.) are determined by taking into account:

1.7.1. changes in legislation;

1.7.2. proposals of the Rector, the Academic Council, Heads of structural units, employees, and higher education students of the University;

1.7.3. the results of monitoring/evaluation of the implementation of this Program;

1.7.4. the results of the periodic assessment of corruption risks in the activities of the University;

1.7.5. the results of inspections and internal investigations;

1.7.6. the results of inspections of compliance with anti-corruption legislation conducted by the National Agency for the Prevention of Corruption.

1.8. The Commissioner keeps records of training activities in the field of corruption prevention and detection.

2. Providing explanations and consultations to employees by the Commissioner

2.1. In the event of any questions regarding clarification of individual provisions of this Program, the Rector, members of the Academic Council, heads of structural divisions, employees and applicants for higher education may contact the Commissioner for oral or written clarification or consultation.

2.2. The Commissioner shall provide clarification or consultation within a reasonable period of time, but not more than 10 days from the date of receipt of the application. If it is impossible to provide clarification or consultation within the specified period, the Commissioner may extend the period for consideration of the application, which must be notified to the person who requested clarification or consultation. The total period for consideration of the application cannot exceed 30 days from the date of its receipt by the Commissioner.

2.3. 2.3. The Commissioner summarizes the most frequently asked questions, and answers to them and general clarifications (consultations, etc.) of an informational nature are posted on the University website in the tab: “Prevention and Combating Corruption.”

2.4. The Commissioner may choose other forms of providing explanations and consultations on the implementation of this Program and anti-corruption legislation (memorandums, guidelines, video addresses, etc.).

VI. Prevention and verification measures

1. Prevention and resolution of conflicts of interest

1.1. The University strives to ensure that conflicts of interest do not adversely affect the interests of the University, as well as the interests of its higher education students, and founders by preventing, identifying, and resolving conflicts of interest.

1.2. The University prevents and resolves conflict of interest situations based on the following principles:

— the obligation to inform employees about situations that have signs of a conflict of interest;

— preventing the emergence of a conflict of interest;

— individual approach when considering and evaluating each individual case that has signs of a conflict of interest.

1.3. Employees are obliged, no later than the next business day from the day they learned or should have learned about the presence of a real or potential conflict of interest, to notify their immediate supervisor and the Commissioner in writing, not to take actions or make decisions in conditions of a real conflict of interest, and to take measures to resolve the real or potential conflict of interest.

1.4. In the event of a real or potential conflict of interest the Rector of the University shall notify the Commissioner in writing.

1.5. In the event of a real or potential conflict of interest, the Commissioner shall notify the Rector of the University in writing.

1.6. The employee's immediate supervisor, within two working days of receiving notification that a subordinate has a real or potential conflict of interest, takes into account the recommendations of the Commissioner and makes a decision on the method of resolving the conflict of interest, of which the employee is notified.

1.7. An immediate supervisor who has become aware of a conflict of interest of an employee subordinate to him/her (including in the event of independent identification of a conflict of interest of an employee subordinate to him/her without the latter providing the appropriate notification) is obliged to inform the Commissioner and take the measures provided for in this Program to prevent and resolve the conflict of interest.

1.8. Conflict of interest shall be resolved by one of the following measures (separately or in combination):

— removing an employee from performing a task, taking action, making a decision or participating in its adoption in conditions of a real or potential conflict of interest;

— the application of external control over a person's performance of a relevant task, the performance of certain actions or decision-making;

— restricting an employee's access to certain information;

— reviewing the scope of the employee's job (functional) responsibilities;

— transferring an employee to another position;

- dismissal of an employee

1.9. The procedure for applying measures to resolve conflicts of interest and its features for different categories of persons are established by the Commissioner, taking into account the following requirements:

— transferring an employee to another position is only possible with his/her consent if the actual or potential conflict of interest in the employee's activities is permanent and it cannot be resolved in any other way and if there is a vacant position that, by its characteristics, corresponds to the employee's personal and professional qualities;

1.10. the transfer of an employee to another position is applied only with his consent in the event that a real or potential conflict of interest in the employee's activities is of a permanent nature and cannot be resolved in any other way and in the presence of a vacant position that, in its characteristics, meets the personal and professional qualities of the employee;

1.11. the decision to resolve a conflict of interest in the activities of the University Rector is made by the Founder within two working days after receiving the notification. The person concerned and the Commissioner are immediately notified of the decision.

1.12. University employees may independently take measures to resolve a conflict of interest by disclaiming the relevant private interest and providing supporting documents to their immediate supervisor and the Commissioner.

1.13. The Rector of the University may independently take measures to resolve the conflict of interest by disposing of the relevant private interest and providing supporting documents to the Commissioner.

1.14. in the event of a real or potential conflict of interest for a person who is a member of the Academic Council, during the resolution of the issue by this body, such person shall notify the Academic Council and the Commissioner in writing.

1.15. The specified person is prohibited from:

— participating in the preparation of documents for the Academic Council to make a decision on the relevant issue;

— participating in the consideration (discussion) of the relevant issue;

— voting on the relevant issue.

1.16. if the non-participation of a member of the Academic Council of the University leads to the loss of the authority of this body, the participation of such a person in decision-making must be carried out under external control. The decision to exercise external control is made by the Academic Council.

external control is carried out through the participation of the Commissioner in the work of the Academic Council in the status of an observer without the right to vote.

1.17. Typical situations of conflict of interest may be:

1) 1) participation in the adoption or making of a decision on concluding an employment contract, promotion, determining the terms of remuneration and applying measures of material incentives, imposing penalties on a close person;

2) concluding transactions with related parties on behalf of the University;

3) participation of a person subject to the requirements of this Program in making or adopting a decision that may affect the receipt of benefits by another business entity over whose business decisions such person or his/her close person exercises effective control, in which such person or his/her close person are employees, receive or have received remuneration or gifts, or have undergone or are undergoing training;

4) performing the functions of a senior manager in another legal entity which interests may conflict with the interests of the University;

5) making or participating in making decisions by a person to whom the requirements of this Program apply regarding himself/herself regarding remuneration, provision of any benefit of a material or non-material nature, in particular, conducting an internal/official investigation.

2. Interaction with business partners

2.1. The University seeks to cooperate with business partners who conduct their activities legally and ethically, and whose interaction does not pose corruption risks for the University.

2.2. The University informs business partners before establishing business relations with them about the University's principles and requirements in the field of preventing and combating corruption, which are provided for by this Program, other policies developed for its implementation, including the procedure for vetting business partners.

2.3. The University conducts a review of potential business partners (before the date of transactions conclusion) and existing business partners (after establishing legal relations with them).

2.4. The verification of potential or existing business partners of the University is carried out by the Commissioner and Heads of structural units.

2.5. The verification of the University's business partners is carried out for the following purposes:

1) checking business reputation of the business partner for corruption tolerance, namely: whether the business partner has a reputation as an entity whose activities are related to corruption (even in the absence of relevant court decisions), and whether the business partner acts as an intermediary for transferring to the third parties (or for receiving from the third parties) an unlawful benefit;

2) checking whether the business partner has an anti-corruption program (or any other anti-corruption policies), the status of its (their) actual implementation, willingness (or refusal) to comply with the principles and requirements of the University including anti-corruption legislation;

3) identification of possible corruption risks in connection with the conclusion (execution) of a transaction;

4) minimizing the likelihood of committing or verifying possible facts of committing a corruption or corruption-related offense, or other violation of anti-corruption legislation when establishing and/or implementing legal relations with a business partner.

2.6. In the event of reasonable doubts concerning the business reputation of a business partner, which may lead to corruption risks for the University, the University reserves the right to refuse a business partner the establishment/continuation of a business relationship.

2.7. Anti-corruption clauses may be included in agreements (contracts) that the University concludes with business partners. The purpose of the anti-corruption clause is to provide the University with guarantees of compliance with the anti-corruption legislation that applies to it and to obtain similar guarantees from the business partner**.**

The wording of anti-corruption provisions is developed by the Commissioner, taking into account the areas of activity of the University.

3. Business Hospitality policies and procedures. Gifts.

3.1. The University, taking into account the requirements of the law, determines the general policy and procedures for providing and accepting business hospitality and gifts.

3.2. The Rector, the Academic Council, the Heads of structural units and employees are required to refrain from offering business hospitality or gifts to officials, their relatives, actual or potential business partners, their employees, or representatives if such business hospitality or gifts could be regarded as an inducement or willingness to commit a corruption offense related to the activities of the University.

3.3. Giving and receiving gifts, as well as providing and accepting business hospitality within the framework of establishing or maintaining business relationships or achieving another objective of the University's activities is permitted if it meets the following criteria:

1) does not aim to influence the objectivity of any decision regarding the conclusion of transactions, provision or receipt of services, information, or any other benefits for the University;

2) is not a hidden undue advantage;

3) corresponds to generally accepted ideas about hospitality (for example, a gift is a souvenir);

4) is not prohibited by the legislation of the state in which they are provided and/or received;

5) the cost does not exceed the limits established by law;

6) is not prohibited according to the internal documents of the recipient organization and does not exceed the value established by such documents;

7) disclosure of the gift or business hospitality will not create a risk to the business reputation of the University or the recipient of the gift or business hospitality;

8) gifts and business hospitality are reasonable, not excessive and appropriate in the context of establishing/maintaining business relationships.

3.4. Giving and receiving gifts in the form of money (cash or non-cash) or cash equivalents (gift cards or gift vouchers) is not permitted.

3.5. In case of doubt regarding the acceptability of a gift or business hospitality, employees must contact the Commissioner in accordance with the procedure specified in this Program for advice and/or clarification.

3.6. The Rector, the Academic Council, Heads of structural units, and employees shall notify the Commissioner within one working day of the facts of providing (providing) or receiving a gift/business hospitality within the framework of generally accepted notions of hospitality in accordance with the procedure established by the University.

4. Charity and sponsorship activities

4.1. The University may carry out charitable and sponsorship activities in the absence of prohibitions established by law and internal documents of the University.

4.2. The University carries out charitable and sponsorship activities in accordance with the legislation and provided that there is no substantiated conclusion of the Commissioner on the presence of corruption risks.

4.3. The Commissioner carries out a preliminary review of planned charitable and sponsorship activities and approves draft transactions for the implementation of charitable and sponsorship activities in order to ensure that charitable and sponsorship assistance is not used as an improper benefit or for other illegal purposes.

4.4. The procedure for the Commissioner to conduct a preliminary inspection of planned charitable and a sponsorship activity is determined by the University.

4.5. The University is not allowed to carry out charitable or sponsorship activities if:

1) its implementation is a condition for concluding any transaction, adopting a decision by a state authority or local government body, or it is carried out with the aim of obtaining illegal advantages in business activities;

2) a business partner/official insists on carrying out a particular type of charitable and/or sponsorship activity exclusively through a specific organization;

3) it is carried out with the aim of influencing an official or in exchange for any improper benefit for the University from business partners.

4.6. The main tools for the University to exercise control over charitable and sponsorship activities may be:

1) screening potential recipients of charitable and sponsorship assistance in the manner used for screening business partners, or in another manner established by the University;

2) prior approval with the Commissioner for charitable and sponsorship projects and transactions;

3) procedures for monitoring the targeted use of charitable and sponsorship assistance, which the University determines independently;

4) public disclosure, in the manner prescribed by the University, of information on the implementation of charitable and sponsorship activities in

order to ensure public control (in the absence of prohibitions established by law).

4.7. The University keeps registers of contributions made by the University to charitable and sponsorship activities. Such registers, as well as financial statements regarding transactions related to charitable and sponsorship activities and their recipients (beneficiaries) are subject to storage.

5. Support for political parties

5.1. The University does not support political parties unless expressly prohibited by law or University policy.

5.2. In the absence of prohibitions established by legislation and University policy, the University may make contributions to support political parties in accordance with the procedure established by the Law of Ukraine “On Political Parties in Ukraine”.

5.3. The total amount (sum) of contribution(s) in support of a political party from the University during the year cannot exceed the amount established by the Law of Ukraine "On Political Parties in Ukraine".

5.4. Contributions to support political parties are made subject to the absence of a substantiated conclusion by the Commissioner on the existence of corruption risks.

5.5. In addition to the Commissioner, other structural units of the University may be involved in verifying compliance with the requirements of the law, including anti-corruption law, and this Program when making contributions to support political parties, in accordance with the University's policy on supporting political parties.

5.6. The University maintains a register of contributions made to support political parties. Such register as well as financial statements on transactions involving contributions to support political parties and their recipients are subject to storage.

5.7. The University applies the rules defined in this section when supporting political parties in the territory of any state taking into account the restrictions on supporting political parties established by the legislation of the relevant state.

6. Verification during the conclusion of merger or acquisition agreements

6.1. When planning and executing merger or acquisition transactions, the University conducts an audit of the legal entity - a potential object of merger or acquisition - in order to identify corruption risks, verify the purpose and procedure for implementing such a transaction for compliance with anti-corruption legislation and this Program.

6.2. The verification is carried out before and after the transaction is completed.

6.3. The scope of the inspection is determined by the University depending on the nature and level of corruption risks that may arise in connection with the conclusion of a transaction regarding a specific merger or acquisition object.

6.4. The Commissioner and other persons may be involved in the inspection.

6.5. Before concluding a transaction, the inspection includes:

2) studying the history and activities of the object of merger or acquisition, the structure of its founders/participants/ultimate beneficial owners;

3) determining the possible connections of the merger or acquisition target with officials and the nature of interaction with them;

4) a study of the main elements of the system for preventing and combating corruption (anti-corruption program, etc., corruption risk management system) of the merger or acquisition target;

5) identification of corruption cases in which the target of the merger or acquisition may be involved (information about ongoing investigations/legal proceedings);

6) checking the presence of current sanctions applied to the object of the merger or acquisition;

7) establishing the circle of counterparties of the merger or acquisition object (clients, suppliers, intermediaries) with high corruption risks and the nature of contractual relations with them;

8) a study of the internal control mechanisms of the merger or acquisition target (control over transactions with high corruption risks, gift giving, business hospitality, charitable and sponsorship activities, etc.);

9) a study of the existence and functioning of a system for reporting corruption or corruption-related offenses and other violations of the Law of Ukraine "On the Prevention of Corruption";

10) determining the scope and nature of issues that should be addressed after the transaction is completed.

6.6. The Rector of the University takes into account the results of the inspection when making the final decision on the transaction.

6.7. After a transaction is completed, the audit includes:

1) identifying inconsistencies in the anti-corruption measures system of the merger or acquisition target;

2) ensuring that the system of anti-corruption measures of the object of the merger or acquisition is consistent with the nature and level of its inherent corruption risks;

3) determining corrective measures to bring the system of anti-corruption measures into line with the requirements of anti-corruption legislation.

6.8. If during the anti-corruption audit facts of corruption are revealed, the University takes measures to stop them, inform in accordance with the established procedure specially authorized entities in the field of combating corruption, and prevent similar practices in the future.

7. Verification candidates for positions

7.1. In order to implement this Program, the University, as part of its employee selection procedures, conducts verification of candidates for positions that are vulnerable to corruption risks.

7.2. The verification of candidates for positions is carried out for the following purposes:

1) to establish whether concluding an employment contract with the candidate does not pose corruption risks for the University;

2) to establish whether concluding an employment contract with the candidate will not lead to a violation of anti-corruption legislation;

3) to ensure that the candidate undertakes to comply with the requirements of this Program.

7.3. The decision to conclude an employment contract is made taking into account the requirements of anti-corruption legislation.

7.4. The Commissioner conducts verification of candidates for positions vulnerable to corruption risks. Based on the results of the check, the Commissioner prepares a reasoned conclusion for the Rector of the University on the presence or absence of corruption risks.

7.5. The procedure for verifying candidates for positions and the list of positions vulnerable to corruption risks is determined by the University.

7.6. Materials from the verification of candidates for positions vulnerable to corruption risks are stored in personal files throughout their storage period.

VII. Notifications, their verification and responsibility

1. Notification of possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine "On the Prevention of Corruption"

1.1. The University creates favorable conditions for whistleblowers and builds respect for whistleblowers as part of the University's business culture.

1.2. The University provides whistleblowers with the conditions to report possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine "On Prevention of Corruption" (hereinafter - the Report) by:

1) the mandatory creation and maintenance of channels through which a person can provide Notification while maintaining their anonymity (hereinafter referred to as Notification Channels);

2) determination, in accordance with the Law of Ukraine "On Prevention of Corruption", of internal procedures and mechanisms for accepting and considering Reports, verifying and appropriately responding to them;

3) providing methodological assistance and consultations on the implementation of the Notification to potential whistleblowers;

4) implementation of mechanisms for encouraging and forming a culture of Communication;

5) compliance with the rights and guarantees of protection of whistleblowers.

1.3. Whistleblowers independently determine which Notification Channels to use for making a Report.

1.4. Whistleblowers are guaranteed confidentiality in accordance with the procedure and conditions specified by the Law of Ukraine "On Prevention of Corruption".

1.5. A person may make a Notification without indicating authorship (anonymously).

1.6. Information about Message Channels is communicated to all employees, including during hiring, and is posted on the University website.

1.7. The University encourages business partners to report through the Notification Channels any facts known to them of corruption or corruption-related offenses, other violations of the Law of Ukraine "On Prevention of Corruption" by the Rector, the Academic Council, Heads of structural units, and employees of the University.

1.8. The report must contain factual data confirming the possible commission of a corruption or corruption-related offense, or other violation of the Law of Ukraine "On Prevention of Corruption", which can be verified.

1.9. An Anonymous Report is subject to consideration if the information contained therein relates to a specific person and contains factual data that can be verified.

1.10. Means of encouraging the Notification are implemented by the University through:

1) approval of internal documents of the University that determine the forms of incentives, organizational principles of the functioning of the incentive mechanism;

2) providing methodological assistance and consultations on the implementation of the Notification;

3) moral and material encouragement to whistleblowers.

1.11. Means of forming a culture of communication are implemented by the University through:

1) approval of internal University documents regarding ethical behavior at the University, in particular, building respect for whistleblowers as responsible citizens;

2) conducting internal training on forming a culture of Communication;

3) systematic implementation of educational and communication activities.

2. Whistleblower rights and guarantees

2.1. Whistleblowing is the honorable right of every employee of the University.

2.2. The whistleblower has the rights and guarantees of protection provided for in Articles 53 – 53, The Law of Ukraine "On Prevention of Corruption", in particular:

1) submit evidence to support your Notification;

2) receive confirmation of receipt and registration of the Notification;

3) cooperate confidentially;

4) receive information about the status and results of consideration, verification and/or investigation of information based on the information reported by him/her;

5) be released from legal liability for the implementation of the Notification, the dissemination of the information specified in the Notification, despite the possible violation of one's labor, civil or other duties or obligations by such Notification;

6) be exempt from civil liability for property and/or moral damage caused as a result of making a Notification, except in the case of a knowingly false notification.

2.3. The rights of a whistleblower arise from the moment of making a Report, which contains factual data confirming the possible commission of a corruption or corruption-related offense, or other violation of the Law of Ukraine "On Prevention of Corruption", which can be verified.

2.4. The whistleblower is provided with guarantees of protection of his rights in accordance with the procedure and under the conditions established in the Law of Ukraine "On the Prevention of Corruption".

2.5. It is prohibited to disclose information about the identity of the whistleblower, his/her close relatives or other data that may identify the identity of the whistleblower, his/her close relatives, to third parties who are not involved in the consideration, verification and/or investigation of the facts reported by him/her, as

well as to persons whose actions or inaction are related to the facts reported by him/her, except in cases established by law.

2.6. Access to information about whistleblowers is only available to the University Rector, the Commissioner and employees designated by him who are involved in the process of accepting and considering Reports at the University.

2.7. In the event of a leak of confidential information about a whistleblower, the Commissioner, the Rector of the University, upon the application of such a person or on his own initiative, must immediately take all measures to avoid negative consequences for the whistleblower associated with such disclosure.

2.8. The University prohibits intimidation, humiliation or persecution of whistleblowers, the application of other negative measures of influence to them (refusal to hire; dismissal or forced dismissal; disciplinary action; other measures, including formally lawful decisions and actions that are selective in nature, in particular, are not applied to other employees in similar situations and/or have not been applied to other employees in similar situations before) or threats to apply such measures of influence.

2.9. The Whistleblower may not be dismissed or forced to resign, held disciplinary accountable, subjected to other negative measures of influence or threatened with such measures of influence in connection with the Report.

2.10. The Rector, the Academic Council, the Heads of structural units, and the Commissioner, within the limits of their powers, ensure conditions for the protection of whistleblowers.

2.11. The rights and guarantees of protection of whistleblowers extend to the whistleblower's close relatives.

3. Notification of possible violations of this Program

3.1. Employees, higher education students, as well as business partners of the University may report any signs of violations of this Program, facts of incitement by the Rector, Academic Council, heads of structural units, employees of the University to commit corruption or corruption-related violations, other violations of the Law of Ukraine "On the Prevention of Corruption" directly to the Rector of the University, the Commissioner, or by sending an email to the University's email address: rector.puet@gmail.com.

3.2. The procedure for considering such notifications, interaction with the applicant, guarantees of ensuring the confidentiality of information about the applicant and protection of his rights are determined by an internal document of the University.

4. Conducting internal investigations

4.1. In the event of a Report or detection of signs of a corruption or corruption-related offense, other violation of the Law of Ukraine "On the Prevention of Corruption" or this Program by a member of the Academic Council, Heads of a structural units or employees of the University, the Commissioner conducts a preliminary verification of the received (discovered) information in accordance with

the requirements of the Law of Ukraine "On the Prevention of Corruption" and internal documents of the University.

4.2. If the received (discovered) information about the commission of a corruption or corruption-related offense, or another violation of the Law of Ukraine "On the Prevention of Corruption" concerns the actions or inaction of the Rector of the University, the Commissioner shall send such information to the Founder within three days without conducting a preliminary check.

4.3. 4.3. In the event of receipt of a Notification or detection of signs of a corruption or corruption-related offense committed by the Commissioner, or another violation of the Law of Ukraine "On the Prevention of Corruption" or this Program, a preliminary verification of such information is carried out in accordance with the internal documents of the University.

4.4. Based on the results of the preliminary inspection, the following decision(s) is/are made:

1) take measures to stop the identified violation;

2) order an internal investigation in the event of confirmation of the facts (discovered) set forth in the Notification or the need for further clarification of their authenticity;

4.5. The purpose of the internal investigation is to verify factual data about the possible commission of a corruption or corruption-related offense, other violation of the Law of Ukraine "On the Prevention of Corruption" or this Program.

4.6. An internal investigation is being conducted by a commission.

4.7. The Commission must include the Commissioner, except in cases where the investigation is appointed as a result of discovering facts or receiving information about the Commissioner committing a corruption or corruption-related offense, or other violation of the Law of Ukraine "On the Prevention of Corruption" or this Program.

4.8. All Heads of structural units and employees of the University, regardless of their position, are obliged to facilitate the internal investigation, as well as provide the necessary available documents and materials.

4.9. The Head of a structural unit or employee of the University, in respect of whom an internal investigation is being conducted, may be temporarily suspended from work (if there are grounds provided for by law) or otherwise restricted in access to the material, information and other resources of the University for the duration of the internal investigation based on the decision of the Rector of the University or, if the investigation concerns the Rector of the University, based on the decision of the founder.

4.10. Based on the results of the internal investigation, the following decision(s) is/are made:

1) take measures to stop the identified violation;

2) apply disciplinary action to the guilty persons;

3) determine ways to eliminate the causes and conditions of the violation and the consequences caused by it, and take measures to prevent such violations in the future;

4) take measures to restore the rights and legitimate interests of individuals and compensate for losses and harm caused to individuals and legal entities as a result of violations;

5) transfer materials to the pre-trial investigation body in case of establishing signs of a criminal offense or to other bodies authorized to respond to detected offenses.

4.11. The term of the internal investigation shall not exceed 30 (thirty) calendar days from the date of completion of the preliminary inspection. If it is impossible to verify the reported (discovered) information within the specified period, the Rector of the University shall extend the term of the internal investigation up to 45 days.

4.12. The procedure for conducting internal investigations is determined by the University.

4.13. The Commissioner has access to materials of internal investigations, which are stored for at least 5 years.

5. Disciplinary liability for violation of this Program

5.1. For violation of the provisions of this Program, disciplinary measures are applied to University employees in accordance with the legislation, the rules of the University's internal labor regulations, and the provisions of employment contracts.

5.2. The Rector of the University ensures that measures are taken for the commission of a corruption or corruption-related offense.

VIII. Supervision, control, amendments to this Program

1. Supervision and control

1.1. The Commissioner supervises and constantly monitors compliance with this Program by the Rector, the Academic Council, Heads of structural divisions, and employees of the University.

1.2. The Commissioner shall supervise and control compliance with this Program by:

1) reviewing and responding to Notifications;

2) conducting inspections of the activities of University employees regarding the implementation (implementation) of this Program;

3) conducting checks of organizational and administrative documents, transactions, other documents of the University provided for by this Program, as well as their drafts for the presence of corruption risks;

4) periodic monitoring of the implementation of this Program.

The University may determine the procedure for conducting scheduled and unscheduled inspections of the activities of University employees, the procedure for conducting document inspections, as well as additional forms of supervision and control over compliance with this Program, taking into account the specifics of its activities.

1.3. If, during supervision or control over compliance with this Program, the Commissioner discovers signs of a corruption or corruption-related offense, he or she shall initiate an internal investigation before the Rector of the University in accordance with the procedure provided for by this Program and internal documents of the University.

1.4. The authorized person shall prepare a report on the results of monitoring the implementation of this Program (hereinafter referred to as the Report) at least once a year, within the time limits and in the manner determined by the Rector of the University. Such a Report shall be equivalent to an annual assessment of the results of the implementation of measures provided for in this Program.

1.5. The Report should include information on:

1) the status of implementation of the measures defined by this Program;

2) the results of the implementation of measures defined by this Program;

3) identified violations of the requirements of the Law of Ukraine "On the Prevention of Corruption", this Program, measures taken to eliminate such violations and prevent their commission in the future;

4) the number of inspections, internal investigations conducted, and their results;

5) facts of violation of the guarantees of the Commissioner's independence;

6) the status of implementation of measures aimed at eliminating or minimizing corruption risks;

7) conducted training activities on the prevention and detection of corruption and the status of assimilation of the knowledge obtained;

8) cooperation with whistleblowers;

9) newly identified corruption risks;

10) suggestions and recommendations.

1.6. The report may contain other information related to the implementation of this Program.

1.7. The summarized results of monitoring the implementation of this Program are posted in general open access for University employees, as well as on the official website of the University, in the tab "Prevention and Counteraction to Corruption" (http://puet.edu.ua/uk/zapobigannya-ta-protidiya-korupciyi).

1.8. The Commissioner shall ensure that, at least once a year, an assessment of the results of the implementation of measures provided for in this Program is organized.

1.9. The results of the assessment are summarized by the Commissioner in a written report, which is agreed upon by the Academic Council of the University and approved by the Rector.

1.10. The assessment of the results of the implementation of measures provided for in this Program is carried out according to the criteria determined by the Commissioner and must contain information in a volume not less than that provided for in the Report.

2. Amendments to this Program

2.1. The Rector of the University ensures the organization of feedback mechanisms and other internal processes aimed at supporting and continuously improving this Program.

2.2. This Program is reviewed in the following cases:

1) according to the results:

— assessment of corruption risks in the activities of the University;

— supervision and control over compliance with this Program, as well as assessment of the results of the implementation of the measures provided for therein;

2) in the event of changes to legislation, including anti-corruption legislation, that affect the activities of the University;

3) in case of changes in the organizational structure and business processes of the University (if necessary).

2.3. The initiator of changes to this Program may be the Commissioner, as well as the Rector, the Academic Council, Heads of structural divisions, employees, and higher education students of the University.

2.4. Proposals for amendments to this Program are submitted to the Commissioner, who studies and systematizes them.

2.5. Once a year, the Commissioner provides the Rector of the University with a summary of proposals for amendments to this Program and provides his recommendations for their consideration or rejection.

2.6. 2.6. The Rector of the University, having received from the Authorized Person a summary of proposals for amendments to this Program, initiates an open discussion among the work collective.

2.7. In cases where the Commissioner insists on urgent introduction of certain changes to this Program, the Rector of the University shall initiate a corresponding discussion as soon as possible, but no later than 10 days from the date of receipt of such proposals.

2.8. In the event of approval of proposals for amendments to this Program by the University staff, the University Rector shall, by his decision (order), approve the relevant amendments, which are an integral part of this Program.

Approval of document content

Position	First name, LAST NAME	Date	Signature
Director of the Educational and Scientific Center for Quality Assurance in Higher Education	Olena HASII		
Legal Expert	Oleksandr VODIANYK		
Chairman of the Trade Union Committee	Larysa DIDENKO		