Charity Organization «Charity Fund named after Avhustyn Voloshyn»

Anti-Corruption Programme

Approved
by decision of the Board of the Fund
Minutes No. 2 of 7 September 2026

English translation · the Ukrainian original prevails

Uzhhorod · voloshynfund.com · EDRPOU code 46220592

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ANTI-CORRUPTION PROGRAMME

1. General Provisions

1.1. The Anti-Corruption Programme of the Charity Organization «Charity Fund named after Avhustyn Voloshyn» (hereinafter — the Programme) has been developed to prevent, detect and counter corrupt and fraudulent acts in the activities of the Fund, and to comply with the requirements of international donors, grant-makers and state authorities that finance or supervise the activities of the Fund.

1.2. The Programme supplements the Fund's Regulations on Financial Compliance and details the organisational mechanisms for preventing corruption: the appointment of a responsible officer, the procedure for assessing corruption risks, staff training and the response to reports of violations.

1.3. The Programme applies to members of the governing bodies, employees, volunteers, consultants and other persons acting on behalf of the Fund, and also (through the relevant provisions of contracts) to the Fund's counterparties and partners.

2. Anti-Corruption Officer

2.1. The Board of the Fund appoints an Officer responsible for the prevention and detection of corruption (hereinafter — the Anti-Corruption Officer), who acts on the basis of a separate order and a job description.

2.2. The powers of the Anti-Corruption Officer include:

— organising the implementation of this Programme and monitoring compliance with it;

— assessing corruption risks in the activities of the Fund at least once a year;

— receiving, registering and considering reports of suspected corrupt or fraudulent acts;

— organising training for employees and volunteers on anti-corruption policy;

— preparing an annual report to the Board on the implementation of the Programme and the violations identified;

— interacting with donors and supervisory authorities on matters within the scope of the anti-corruption Programme.

2.3. The Anti-Corruption Officer is independent in deciding on the consideration of reports of violations and reports directly to the Board of the Fund rather than to the Executive Director, in order to avoid a conflict of interest.

2.4. The contact details of the Anti-Corruption Officer (position, e-mail address for reports) are communicated to all employees, volunteers and partners of the Fund and published on the official website of the Fund.

3. Corruption Risk Assessment

3.1. The Anti-Corruption Officer, together with the Executive Director, carries out an annual assessment of corruption risks in the key areas of the Fund's activities, in particular:

1) procurement of goods, works and services;
2) selection of beneficiaries and payment of charitable aid to them;
3) recruitment and personnel management;
4) interaction with state authorities and officials;
5) handling of cash (in the cases provided for in clause 3.3 of the Regulations on Financial Compliance).

3.2. Based on the results of the assessment, a corruption risk map is drawn up, setting out the measures to minimise the risks, the persons responsible and the deadlines. The risk map is approved by the Board.

4. Training and Awareness

4.1. All new employees and volunteers of the Fund familiarise themselves with this Programme and the Regulations on Financial Compliance before taking up their duties and confirm this with their signature.

4.2. The Anti-Corruption Officer organises periodic training of staff (at least once a year) on identifying corruption risks, the procedure for declaring conflicts of interest and submitting reports of violations.

5. Procedure for Responding to Reports of Violations

5.1. Reports of suspected corrupt or fraudulent acts are submitted in the manner set out in the Fund's Whistleblower Protection Policy.

5.2. The Anti-Corruption Officer registers each report, examines it within a period not exceeding 30 calendar days and informs the Board of the results of the examination and the measures proposed.

5.3. Based on the results of the examination, the Board decides on the application of disciplinary measures, the termination of contractual relations with a counterparty and/or referral to law enforcement authorities.

6. Interaction with Donors

6.1. The Fund informs donors, at their request, of the existence of this Programme and of the Anti-Corruption Officer, and promptly notifies a donor of any confirmed cases of misuse of the funds it has provided.

6.2. The Fund undertakes to cooperate with the donor and the competent authorities during any audit or investigation related to suspected corrupt acts involving the Fund.

7. Final Provisions

7.1. This Programme is approved and reviewed by the Board of the Fund at least once a year, as well as following the corruption risk assessment or significant changes in the activities of the Fund.

7.2. This Programme enters into force on the day of its approval by the Board of the Fund.

Charity Organization «Charity Fund named after Avhustyn Voloshyn»:

Chair of the Board _____ / V.A. Moskov /

7 September 2026



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