Charity Organization «Charity Fund named after Avhustyn Voloshyn»

Beneficiary Safety and Protection Policy

Approved

by decision of the Board of the Fund

Minutes No. 2 of 7 September 2026

English translation · the Ukrainian original prevails

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BENEFICIARY SAFETY AND PROTECTION POLICY

1. General Provisions

1.1. The Beneficiary Safety and Protection Policy (hereinafter — the Policy, safeguarding policy) sets out the measures of the Charity Organization «Charity Fund named after Avhustyn Voloshyn» (hereinafter — the Fund) aimed at preventing any form of harm, exploitation, violence or abuse of the Fund's beneficiaries, in particular children and vulnerable persons, by employees, volunteers, consultants or partners of the Fund.

1.2. The Policy applies to all persons who, while performing tasks on behalf of the Fund, come into contact with beneficiaries, including children, persons with disabilities, older people and persons affected by conflict or violence.

2. Prohibited Conduct

2.1. The following are strictly prohibited in any form:

— physical, psychological, emotional or sexual violence against a beneficiary;

— sexual exploitation and abuse (SEA), including demanding sexual services in exchange for the Fund's assistance or entering into an intimate relationship with a beneficiary by exploiting an inequality of position;

— exploitation of the labour of beneficiaries, humiliation of their dignity or discriminatory treatment;

— photographing beneficiaries (especially children) or distributing their images without the consent of the beneficiary or their legal representative and without complying with the Beneficiary Personal Data Protection Policy;

— establishing personal (non-work) relationships with a beneficiary that exploit the inequality of position between the beneficiary and the representative of the Fund.

3. Preventive Measures

3.1. Before being engaged in work involving direct contact with children or vulnerable beneficiaries, a candidate (employee, volunteer, consultant) undergoes a check, which may include requesting a certificate of no criminal record and checking references from previous places of work or volunteering.

3.2. All persons who come into contact with beneficiaries receive a mandatory briefing on this Policy before starting work and periodic training (at least once a year) on recognising signs of violence and on the response procedure.

3.3. Where organisationally possible, the Fund avoids situations of one-to-one, unsupervised contact between an employee or volunteer and a child beneficiary without other adults present (the «two adults» rule).

4. Procedure for Reporting and Response

4.1. Any person (employee, volunteer, beneficiary, community member) who becomes aware of a fact or suspicion of a breach of this Policy shall immediately report it to the Anti-Corruption Officer or directly to the Executive Director or, if the suspicion concerns them, to the Chair of the Board, in a manner similar to that of the Whistleblower Protection Policy.

4.2. On receiving a report, the responsible person immediately takes measures to ensure the safety of the affected beneficiary, including temporarily removing the person concerned by the report from contact with beneficiaries until the examination is completed.

4.3. Where a criminal offence is suspected (violence against a child, sexual exploitation), the Fund immediately informs the competent law enforcement and/or guardianship authorities, regardless of the results of the internal examination.

4.4. The Fund ensures the confidentiality of the affected beneficiary and of the person who reported the breach, and takes measures to prevent re-traumatisation of the affected person while the report is being considered (minimising the number of interviews, providing psychological support where needed).

5. Liability

5.1. A confirmed breach of this Policy is grounds for the immediate removal of the person from work with beneficiaries and for the termination of the employment, civil-law or volunteer agreement, regardless of other disciplinary or legal consequences.

5.2. Partner organisations and counterparties engaged in implementing projects involving direct contact with beneficiaries undertake by contract to comply with equivalent standards of beneficiary safety.

6. Final Provisions

6.1. This Policy is approved by the Board of the Fund, communicated to all employees, volunteers and partners against signature and reviewed at least once a year.

Charity Organization «Charity Fund named after Avhustyn Voloshyn»:

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

7 September 2026

The signature is reproduced from the original document in Ukrainian.