Charity Organization «Charity Fund named after Avhustyn Voloshyn»

Whistleblower Protection Policy

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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WHISTLEBLOWER PROTECTION POLICY

1. General Provisions

1.1. The Whistleblower Protection Policy (hereinafter — the Policy) sets out the procedure for submitting and considering reports of possible violations in the activities of the Charity Organization «Charity Fund named after Avhustyn Voloshyn» (hereinafter — the Fund) and the guarantees of protection for persons who report such violations in good faith (hereinafter — whistleblowers).

1.2. The purpose of the Policy is to create a safe and confidential channel for reporting corruption, financial or ethical violations without the risk of retaliation against the person who reports.

1.3. The Policy applies to employees, volunteers, members of the governing bodies, beneficiaries, donors, counterparties and any other persons who have become aware of a possible violation in the activities of the Fund.

2. What Should Be Reported

2.1. Information about the following should be reported:

— corrupt acts (bribery, kickbacks, abuse of office);

— fraud, embezzlement or misuse of the Fund’s funds and property;

— breaches of the Regulations on Financial Compliance, the Anti-Corruption Programme, the Procurement Regulations or other internal policies of the Fund;

— concealment of a conflict of interest;

— harassment, discrimination or violations of the safety of beneficiaries (including children and vulnerable persons);

— falsification of reports to donors or state authorities.

3. Reporting Channels

3.1. A report may be submitted in one of the following ways:

1) by e-mail to a separate address of the Fund intended for reports of violations (to which only the Anti-Corruption Officer has access);
2) in writing (a paper letter marked «Confidential — personally to the Anti-Corruption Officer»);
3) orally — at a personal meeting with the Anti-Corruption Officer, with the report subsequently put in writing.

3.2. A report may be anonymous. Anonymous reports are considered on a general basis within the limits of the information they contain.

3.3. The recommended report form is given in Annex 1 to this Policy.

4. Procedure for Considering Reports

4.1. The Anti-Corruption Officer registers the report within 2 working days of its receipt and informs the whistleblower of the registration (if their identity is known and they do not object to feedback).

4.2. The report is examined within up to 30 calendar days; if the examination is complex, the period may be extended by the Board, of which the whistleblower is informed.

4.3. If the report concerns the actions of the Anti-Corruption Officer, the Executive Director or a member of the Board, it is considered directly by the Chair of the Board or by a committee of the Board formed for this purpose, without the involvement of the person concerned.

4.4. Following the examination, a conclusion with recommendations for further action (disciplinary measures, referral to law enforcement authorities, changes to internal procedures) is drawn up and submitted to the Board for consideration.

5. Guarantees of Protection for Whistleblowers

5.1. The Fund guarantees the confidentiality of the whistleblower's identity: information about the person who submitted the report is disclosed only with their written consent or at the request of law enforcement or judicial authorities in the manner established by law.

5.2. Any form of retaliation, discrimination, dismissal, demotion, withdrawal of a bonus or other adverse consequences for an employee or volunteer in connection with the good-faith submission of a report of a violation is prohibited.

5.3. The guarantees of protection do not apply to a person who has knowingly submitted a false report.

5.4. If retaliation against a whistleblower is identified, the Board of the Fund takes immediate measures to restore the violated rights of that person and to hold those responsible accountable.

6. Final Provisions

6.1. This Policy is approved by the Board of the Fund, communicated to all employees and volunteers against signature and published on the official website of the Fund.

6.2. The contact details for submitting reports (e-mail address, postal address) are kept up to date by the Anti-Corruption Officer and are given in Annex 1.

Charity Organization «Charity Fund named after Avhustyn Voloshyn»:

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

7 September 2026



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Annex 1. Report Form for a Violation

(submitted to the Anti-Corruption Officer of the Fund)

Field	Information
Date of the report	
Full name of the whistleblower (optional; the report may be anonymous)	
Contact details for feedback (optional)	
Description of the situation / violation (who, what, when, where)	
Persons involved in the violation (if known)	
Available evidence / documents (list, if any)	
Has this been reported before, and to whom	

Signature (optional): _____

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

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