Charity Organization «Charity Fund named after Avhustyn Voloshyn»

Regulations on Conflict of Interest

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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REGULATIONS ON CONFLICT OF INTEREST

1. General Provisions

1.1. These Regulations on Conflict of Interest (hereinafter — the Regulations) establish the procedure for identifying, disclosing and resolving conflicts of interest in the activities of the Charity Organization «Charity Fund named after Avhustyn Voloshyn» (hereinafter — the Fund).

1.2. A conflict of interest is a situation in which the personal (including family, kinship, friendly, property or commercial) interests of a member of a governing body, an employee or a volunteer of the Fund conflict or may conflict with the interests of the Fund and affect or may affect the objectivity and impartiality of decisions taken on behalf of the Fund.

1.3. These Regulations apply to members of the Board, the Supervisory Board (if any), the Executive Director, staff members, volunteers and persons engaged on a contractual basis in taking decisions on behalf of the Fund.

2. Situations of Potential Conflict of Interest

2.1. A conflict of interest arises, in particular, in the case of:

— the Fund concluding a contract with a legal entity or natural person related to an officer or employee of the Fund (a relative, a family member, a company in which the person or their relative holds corporate rights or a position);

— a person taking part in a personnel decision (recruitment, award of bonuses, selection of a volunteer) concerning their relative or a close person;

— a person simultaneously holding a position in the Fund and in a donor organisation, a counterparty or a competing non-profit organisation;

— a person or persons close to them receiving gifts, services or other benefits from a counterparty or beneficiary of the Fund in connection with the performance of official duties;

— any other situation in which a personal interest may affect the objectivity of a decision taken on behalf of the Fund.

3. Procedure for Disclosing a Conflict of Interest

3.1. A person referred to in clause 1.3 shall notify in writing of an actual or potential conflict of interest before the relevant decision is taken and, if the conflict is identified after the decision has been taken, immediately, but no later than 3 working days from the moment they became aware of the conflict.

3.2. The notification of a conflict of interest is submitted in writing (a conflict of interest declaration) to the Executive Director and, in respect of the Executive Director or members of the Board, to the Chair of the Board.

3.3. All conflict of interest declarations are entered in a separate register kept by the Anti-Corruption Officer (if such a position exists) or by the Secretary of the Board.

4. Procedure for Resolving a Conflict of Interest

4.1. Depending on the nature and degree of the conflict of interest, the Board of the Fund (or the Executive Director, for lower-level decisions) applies one or more of the following measures:

1) excluding the person from preparing, discussing and taking the relevant decision;
2) revising the scope of the person's official powers as regards the conflict;
3) additional independent control over the decision or transaction in respect of which the conflict has arisen (consideration by a collegial body instead of a decision by one person);
4) refusing to conclude a contract with the related person or related counterparty;
5) in certain cases, temporarily removing the person from performing the duties related to the conflict.

4.2. The decision on how to resolve the conflict of interest and its implementation are documented (minutes of the Board meeting or a written decision of the Executive Director) and kept together with the relevant declaration.

4.3. Concealing an existing conflict of interest or failing to submit a declaration is a breach of these Regulations and entails disciplinary liability and, for members of the Board, may be grounds for considering the early termination of their powers.

5. Annual Declaration

5.1. Members of the Board, the Executive Director and employees involved in financial or procurement decisions submit annually a general declaration of the absence or presence of potential conflicts of interest (related persons, affiliated organisations), regardless of whether a specific conflict situation arose during the year.

6. Final Provisions

6.1. These Regulations are approved by the Board of the Fund and reviewed at least once a year.

6.2. The form of the conflict of interest declaration is approved as a separate annex to these Regulations.

Charity Organization «Charity Fund named after Avhustyn Voloshyn»:

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

7 September 2026



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