

MINISTRY OF EDUCATION AND SCIENCE OF UKRAINE

V. N. KARAZIN KHARKIV NATIONAL UNIVERSITY

APPROVED

by the Decision of the Academic Council
of V. N. Karazin Kharkiv National University
on August 30, 2016, Protocol No. 10

Effective as of:

Rector's Order No. 0201-1/430
on September 22, 2016.

**Anti-Corruption Program
of V. N. Karazin Kharkiv National University**

1. General Provisions

1.1. The anti-corruption program of the University is developed in accordance with the Constitution of Ukraine, the Law of Ukraine "On the Principles of State Anti-Corruption Policy in Ukraine (Anti-Corruption Strategy) for 2014-2017," the Law of Ukraine "On Prevention of Corruption" (hereinafter referred to as the Law), the Law of Ukraine "On Public Procurement," and other laws, as well as regulatory legal acts based on them.

1.2. The anti-corruption program applies to all employees of V. N. Karazin Kharkiv National University (hereinafter referred to as the University), including individuals undergoing educational/production internships at the University, as well as individuals working under subcontract agreements if this condition is stipulated in their contracts.

1.3. Anti-corruption measures are aimed at:

- Preventing corruption, including the identification and elimination of the causes of corruption (corruption prevention);
- Detecting corrupt offenses, disclosing and investigating corrupt offenses;
- Minimizing and eliminating the consequences of corrupt offenses.

1.4. Provisions regarding the mandatory compliance with the anti-corruption program are incorporated into the job descriptions of University employees and the Internal Rules of the University, and may also be included in contracts entered into by the University.

2. Terms Used in the Anti-Corruption Program

2.1. Administrative and economic duties - the responsibilities of specific individuals at the University (including heads of planning and economic, procurement, financial departments and services, heads of warehouses, workshops, their deputies, etc.) for the management or disposition of state, collective, or private property within the University (establishing procedures for its storage, processing, sale, ensuring control over these operations, etc.).

2.2. Anti-corruption expertise - the activity aimed at identifying provisions in legislative acts or draft legislative acts that, either independently or in conjunction with other norms, may contribute to the commission of corrupt offenses or offenses related to corruption.

2.3. Close relatives - individuals who cohabit, share a common household, and have mutual rights and obligations with the subject mentioned in Part 1 of Article 3 of the Law (excluding individuals whose mutual rights and obligations with the subject do not have a family character). This includes individuals who cohabit but are not married, and regardless of the aforementioned conditions: husband, wife, father, mother, stepfather, stepmother, son, daughter, stepson, stepdaughter, biological brother, biological sister, grandfather, grandmother, great-grandfather, great-grandmother, grandson, granddaughter, great-grandson, great-granddaughter, son-in-law, daughter-in-law, father-in-law, mother-in-law, brother-in-law, sister-in-law, adoptive parent or adopted child, guardian or ward, a person under the guardianship or care of the mentioned subject.

2.4. Corruption prevention - the university's activities aimed at implementing an anti-corruption policy, focused on identifying, studying, limiting, or eliminating phenomena that generate corrupt offenses or contribute to their spread.

2.5. Corrupt offense - an act containing signs of corruption, committed by a person specified in Article 3 of the Law, for which criminal, disciplinary, and/or civil liability is established.

2.6. Corruption - the use by officials working at the university of their official powers or related opportunities for the purpose of obtaining unlawful benefits or

accepting such benefits, or the promise/offer of such benefits to themselves or others, or the promise/offer or provision of unlawful benefits to a person specified in Article 3 of the Law, or at their request, to other natural or legal persons, with the aim of inducing that person to engage in unlawful use of the powers or related opportunities provided to them.

2.7. Unlawful benefit - monetary funds or other property, advantages, privileges, services, intangible assets, any other non-monetary or non-material benefits that are promised, offered, provided, or received without legal grounds.

2.8. Organizational and managerial duties - the responsibilities of specific individuals at the University related to the management of the workforce, the activities of individual university employees, including: the Rector, the first vice-rector, vice-rectors, chief accountant, deputy chief accountant, directors of educational and scientific institutes and their deputies in all areas of activity, deans and their deputies in all areas of activity, heads of departments and their deputies, head of the research department, heads of other structural units and their deputies, individuals responsible for work areas (foremen), and others.

2.9. Gift - monetary funds or other property, advantages, privileges, services, intangible assets that are provided/received free of charge or at a price lower than the minimum market value.

2.10. Official - a person who permanently or temporarily holds a position at the University, and whose functions are associated with the execution of organizational and managerial or administrative and economic duties.

2.11. Potential conflict of interest - the presence of a person's private interest in the sphere in which they perform their official or representative duties, which may affect the objectivity or impartiality of their decision-making or the commission or omission of actions in the execution of these duties.

2.12. Corruption-related offense - an act that does not contain signs of corruption but violates the requirements, prohibitions, and restrictions established by law, committed by a person specified in Article 3 of the Law, for which legal liability is established, including criminal, administrative, disciplinary, and/or civil liability.

2.13. Private interest - any material or non-material interest of a person, including those arising from personal, family, friendly, or other non-official relationships with natural or legal persons, including those arising in connection with membership or activities in public, political, religious, or other organizations.

2.14. Direct subordination - the relationship of direct organizational or legal dependence of a subordinate person on their supervisor, including through decision-making (participation in decision-making) on matters related to hiring, dismissal, application of incentives, disciplinary measures, giving instructions, assignments, etc., and the control over their execution.

2.15. Real conflict of interest - a contradiction between a person's private interest and their official or representative duties that affects the objectivity or impartiality of decision-making or the commission or omission of actions in the execution of these duties.

2.16. Declaration subjects - individuals specified in paragraph 1, subparagraph "a" of paragraph 2 of the first part of Article 3 of the Law, and other individuals required to submit declarations in accordance with the Law.

2.17. Family members - individuals who are married, as well as their children, including adults, parents, individuals under guardianship and care, other individuals who cohabit, share a common household, have mutual rights and obligations (excluding individuals whose mutual rights and obligations do not have a family character), including individuals who cohabit but are not married.

3. The Purpose of the Anti-Corruption Program

3.1. The University's anti-corruption program reflects its support for the state's anti-corruption strategy, which is confirmed by the use of ethical standards and principles in providing information about work performance and service delivery, establishing tariffs. It demonstrates the University's commitment to improving corporate culture, following best practices in corporate governance, and maintaining the University's business reputation at an appropriate level.

3.2. The University defines the following objectives:

- To minimize the risks of involvement of the University's leadership and employees, regardless of their position, in corrupt activities.

- To foster a comprehensive and unified understanding and awareness of the University's anti-corruption program among contractors, employees, and other individuals, promoting a zero-tolerance approach towards corruption in all its manifestations.

- To consolidate and explain the key provisions of Ukraine's anti-corruption legislation.

- To make it an obligation for University employees to have knowledge of and adhere to the principles and requirements of this anti-corruption program, the fundamental provisions of anti-corruption legislation, and to take adequate measures to prevent corruption.

4. Principles of the Anti-Corruption Program

4.1. The Rector of the University and heads of structural units establish ethical standards that promote a negative attitude towards any manifestations of corruption. They set an example through their own behavior and ensure that all employees and contractors are familiar with anti-corruption legislation.

4.2. The Rector of the University is responsible for organizing activities aimed at implementing the principles and requirements of the anti-corruption program. This includes appointing individuals responsible for developing anti-corruption measures, overseeing their implementation, and conducting necessary monitoring and control.

4.3. All University employees must comply with current legislation and the anti-corruption program's principles and requirements.

4.4. The principles and requirements of the anti-corruption program also apply to contractors and representatives of the University, as well as to other individuals in cases where corresponding obligations are specified in contracts, their internal documents, or are directly mandated by law.

4.5. The creation of an anti-corruption system is based on the following key principles:

- Compliance with the current legislation and commonly accepted norms in the University's activities.

- Alignment of anti-corruption measures implemented within the University with the Constitution of Ukraine, Ukrainian legislation, and other relevant regulatory acts applicable to the University.

- Setting a personal example by the University's leadership. The key role of the University's leadership is to foster a culture of intolerance towards corruption and establish a system for preventing and combating corruption.

- Involvement of University employees in eradicating corruption, including ensuring that University employees are informed about the provisions of anti-corruption legislation and actively participate in the development and implementation of anti-corruption standards and procedures.

- The effectiveness of anti-corruption procedures, which involves implementing anti-corruption measures in the University that are not resource-intensive, are easy to implement, and yield significant results.

- Accountability and the inevitability of punishment: Ensuring that punishment is inevitable regardless of the employee's position, length of service, or other conditions, in case of any corruption-related violations committed by an employee in the course of their job responsibilities.

- Ongoing monitoring and regular monitoring to maintain the effectiveness of anti-corruption measures and procedures.

5. Anti-Corruption Measures Conducted by the University during Economic Activities.

5.1. The person responsible for implementing the anti-corruption program (hereinafter referred to as the Authorized Person) develops a specific list and description of anti-corruption measures to be implemented for the purpose of preventing and countering corruption within the University, in accordance with the University's anti-corruption program.

5.2. To identify risks that may arise for the University as a result of violations of anti-corruption legislation, the University's leadership periodically conducts internal audits of the economic activities of its units.

5.3. The audit results allow to identify areas of increased risk and to develop an effective plan of action aimed at neutralizing legal and commercial risks for the University.

5.4. Risk assessment is an ongoing process that maintains continuous communication between the Rector, the Authorized Person, and University employees.

5.5. Risk assessment should also be conducted when working with contractors.

5.6. The University's leadership and its employees are prohibited from engaging or using intermediaries, partners, agents, joint ventures, or any other individuals for actions that contradict the principles and requirements of this anti-corruption program or anti-corruption legislation norms.

5.7. The University selects contractors for the provision of goods and services based on the principle of selecting the best competitive prices. This principle includes:

- Analyzing the market for the offered services.
- Ensuring equality, fairness, non-discrimination, and the absence of unjustified restrictions on competition among contractors.
- Making an honest and reasonable choice of proposals through a comprehensive analysis of benefits and costs (primarily price and product quality).
- Purposeful and economically efficient expenditure of funds for the purchase of goods, works, services (taking into account, if necessary, the total cost of the product's life cycle), and the implementation of measures aimed at reducing the University's expenses.
- Avoiding restrictions on participation in procurement by establishing excessive requirements for contractors (excessive requirements for contractors do not include requirements directly provided for by the current legislation on public procurement, and so on).

- Preventing corrupt practices, conflicts of interest, and other abuses of authority.

5.8. The University aims to have business relationships with contractors who comply with the requirements of anti-corruption legislation and/or contractors who declare their rejection of corruption.

5.9. The University states its refusal to incentivize employees of contractors in any way, including by providing money, gifts, free performance of work (services) on their behalf, and other means not mentioned above, which would put an employee of the contractor in a certain dependence and are aimed at ensuring the performance of any actions in favor of the University.

5.10. The University makes every effort to minimize risks in business relationships with contractors who could be involved in corrupt activities. To achieve this, a review of the contractors' tolerance towards corruption is carried out, including checking for the presence of their own anti-corruption programs, their willingness to comply with the requirements of this anti-corruption program, and the inclusion of anti-corruption terms (provisions) in contracts, as well as providing mutual support for ethical business conduct and the prevention of corruption.

5.11. In case of violations of anti-corruption legislation, the University and its contractors (partners) are obliged to:

- Immediately inform each other in writing about cases of violations of anti-corruption legislation.

- Remind other individuals of the obligation to comply with anti-corruption legislation when entering into agreements (contracts).

5.12. In case there are objective facts within the University indicating violations of anti-corruption legislation by contractors, a notification is sent to the address of such contractor (partner) with a request to provide relevant explanations within 10 days.

5.13. Failure to provide evidence that unquestionably confirms the absence of a violation of anti-corruption legislation constitutes a material breach of the contract, concluded between the University and its contractor. This gives the University the right, if provided for in the contract, to unilaterally terminate such a contract out-of-court (completely refuse to perform the contract) or suspend its further performance unilaterally in some separate part (partially refuse to perform the contract) by sending a relevant written notice.

5.14. The development and implementation of special anti-corruption procedures involve:

- Implementing a procedure to inform employees of the employer about cases that may incite them to commit corruption offenses.

- Implementing a procedure to inform the University about cases of corruption offenses committed by other employees, contractors of the University, or other individuals, which become known to an employee.

5.15. The University conducts training and informs employees on compliance with anti-corruption legislation, including:

- Familiarizing employees, with their signatures, with the regulatory documents that regulate the prevention and counteraction of corruption at the University.

- Conducting educational events on the prevention and counteraction of corruption.

- Organizing individual consultations for employees on the application (compliance) with anti-corruption standards and procedures.

5.16. Compliance with the internal control system at the University with the requirements of the anti-corruption policy is ensured by controlling accounting data, the existence and accuracy of primary accounting documents. All financial transactions conducted at the University must be accurately, correctly, and with an adequate level of detail recorded in the accounting, documented, and available for verification. Distortion or falsification of the University's financial reporting is strictly prohibited and considered a legal violation.

5.17. All University employees are strictly prohibited to directly or indirectly, personally or through intermediaries, participate in corrupt activities, offer, give, promise, request, or receive bribes, or make payments to facilitate administrative, bureaucratic, or other formalities in any form, including in the form of money, valuables, services, or any other benefit, to and from any individuals or entities, including commercial organizations, government and self-governing bodies, public officials, private companies, and their representatives.

5.18. University employees are prohibited from directly or through others demanding, asking for, or receiving gifts for themselves or their close associates from legal or natural persons:

- In connection with the performance of activities related to their official duties at the University;

- If the person giving the gift is under the authority of such a person.

5.19. University employees may accept gifts that conform to generally recognized notions of hospitality, provided that the value of such gifts does not exceed one minimum wage established on the day of receiving the gift, once, and the total value of such gifts received from one source during the year does not exceed two subsistence minimums established for a capable person as of January 1 of the current year.

5.20. Restrictions on the value of gifts do not apply to gifts:

- given by close relatives;
- received as publicly available discounts on goods, services, publicly available winnings, prizes, awards, bonuses.

5.21. In the event that a University employee makes a decision in favor of a person from whom they or their close associates received a gift, the employee's decision is considered to be made under conditions of a conflict of interest.

5.22. University employees, when they receive an offer of an unlawful benefit or gift, are obligated to take the following steps immediately, regardless of their private interests:

- Decline the offer.
- If possible, identify the person who made the offer.
- Involve witnesses if possible, including other employees.
- Report the offer in writing to their immediate supervisor (if applicable) or the Authorized Person, as well as to specially designated entities involved in countering corruption.

5.23. If a person subject to restrictions on receiving gifts discovers or receives property in their office that could be an unlawful benefit or a gift, they are required to report this fact in writing to their immediate supervisor or the Authorized Person immediately but no later than one working day.

5.24. A report is prepared regarding the discovery of property that could be an unlawful benefit or a gift, and this report is signed by the person who discovered the unlawful benefit or gift, as well as their immediate supervisor or the Authorized Person.

5.25. If the property that may be an unlawful benefit or a gift is discovered by the Rector, an act regarding the discovery of such property or gift is signed by the Rector and the person authorized in accordance with the established University procedure to perform the duties of the Rector of the University in case of their absence. In addition to the mentioned individuals, the Authorized Person may also sign the specified act.

5.26. Items of unlawful benefits and received or discovered gifts are stored at the University until they are transferred to the specially authorized entities in the field of combating corruption.

5.27. If a University employee has doubts about the possibility of receiving a gift, they have the right to seek written consultation on this matter from the Authorized Person or the territorial body of the National Agency, which provides the necessary clarification.

5.28. Interaction with government officials.

5.28.1. The University leadership does not independently or through its employees make payments for any expenses (monetary compensation, loans, services, entertainment, leisure, transportation expenses, and other rewards) to government officials and their close relatives (or in their interests) with the purpose of obtaining or maintaining an advantage for the University in its commercial activities.

5.28.2. University employees are personally responsible for corrupt practices in case of independent interaction with government officials, in accordance with the current legislation of Ukraine.

6. Norms of professional ethics for University staff.

6.1. University employees are obliged to strictly adhere to the requirements of the law and recognized ethical standards of conduct while performing their official duties. They should maintain politeness in their interactions with citizens, superiors, colleagues, and subordinates.

6.2. University employees are obliged to adhere to the following principles when performing their official duties:

- Maintain political neutrality, avoid demonstrating their own political beliefs or views in any form, and refrain from using their official authority for the benefit of political parties or individual politicians.

- Not disclose or use confidential or other restricted-access information acquired in the course of their duties and professional responsibilities, except as provided by law.

- Act impartially and without prejudice, regardless of personal interests, personal attitudes toward any individuals, their own political beliefs, ideological, religious, or other personal views or convictions.

- Carry out their professional duties conscientiously, competently, punctually, effectively, and responsibly, following the decisions and assignments of the authorities and individuals to whom they are subordinate or accountable, preventing abuses and the inefficient use of state property.

- Refrain from executing decisions or assignments from superiors if such actions contradict the law, despite personal interests.

6.3. In case a person receives decisions or assignments that they consider illegal or perceive as a threat to the legally protected rights, freedoms, or interests of

individual citizens, legal entities, or the public interest, they must promptly inform the University's Rector in writing about this matter.

7. Duties of University Employees in Preventing and Combating Corruption in University Activities

7.1. University employees have the following duties related to preventing and combating corruption in the University's activities:

- Refrain from committing or participating in acts of corruption on behalf of or in the name of the University.
- Avoid behavior that could be interpreted by others as a willingness to engage in or participate in acts of corruption on behalf of or in the name of the University.
- Immediately inform their immediate supervisor, the Authorized Person, or the University's leadership of any intention to commit an act of corruption.
- Promptly inform their immediate supervisor, the Authorized Person, or the University's leadership of any liability for committing an act of corruption.
- Promptly inform their immediate supervisor, the Authorized Person, or the University's leadership of any information known to the employee regarding instances of corruption committed by other employees, contractors of the University, or other individuals.
- Report to their immediate supervisor or the Authorized Person the emergence or possibility of a conflict of interest within the employee.

7.2. University employees are prohibited to:

- Use their authority or position, as well as the associated capabilities, for the purpose of obtaining undue benefits for themselves or others, including utilizing any University property or funds for private interests.
- Directly or indirectly demand, request, or receive gifts for themselves or their close relatives from legal or natural persons in connection with the performance of their duties, or if the person providing the gift is under their authority.
- Directly or indirectly incite subordinates in any way to make decisions, take actions, or refrain from acting contrary to the law in favor of their private interests or the private interests of third parties.
- Hold organizational, managerial, administrative, or economic responsibilities in two or more positions that involve direct subordination, including conditions of compatibility, combining professions (positions), or hourly pay.

8. Legal Status, Rights, and Responsibilities of the Authorized Person for Corruption Prevention

8.1. Legal Status of the Authorized Person

8.1.1. The Authorized Person is an official of the University appointed to the position for a term of 2 years by the University Rector's order after the candidate's approval by the University Academic Council. The Authorized Person is subordinate to and accountable to the University Rector.

8.1.2. The Authorized Person can be a natural person who, based on their professional and moral qualities, professional competence, and state of health, is capable of fulfilling the corresponding duties.

8.1.3. The following persons cannot be appointed as the Authorized Person:

- Those with an outstanding or unrepealed conviction according to the established legal procedure.
- Persons declared legally incapacitated by a court or whose legal capacity is restricted by court decision.
- Individuals who have been dismissed from positions in state bodies, authorities of the Autonomous Republic of Crimea, local self-government bodies due to a violation of their oath, or in connection with the commission of a corruption-related offense or an offense associated with corruption, within three years from the date of such dismissal.

8.1.4. Holding positions as specified in paragraph 1 of Part 1 of Article 3 of the Law and any other activities that create a real or potential conflict of interest with the activities of a legal entity are incompatible with the role of the Authorized Person.

8.1.5. In case of circumstances of incompatibility, the Authorized Person must notify the University Rector within two days from the date of the occurrence of such circumstances, along with submitting a letter of resignation from the employment contract by their own initiative.

8.1.6. The Authorized Person may be dismissed from the position prematurely in the following cases:

- Termination of the employment contract at the initiative of the Authorized Person.
- Termination of the employment contract at the initiative of the University Rector, subject to the consent of the National Agency.
- Inability to perform their duties due to health reasons, as determined by a medical commission created based on the decision of a specially authorized central executive body responsible for healthcare policy.

- When a court decision declaring them legally incapacitated, restricting their legal capacity, declaring them missing, or declaring them deceased becomes legally effective.

- In case of the Authorized Person's death.

8.1.7. The University Rector shall inform the National Agency in writing about the dismissal of an individual from the position of the Authorized Person within two working days and ensure the immediate submission of a new candidacy for the specified position.

8.2. Rights and Duties of the Authorized Person:

8.2.1. While performing the tasks assigned to them, the Authorized Person has the following rights and duties:

- To receive information from individuals and legal entities regarding violations of the current legislation in the field of anti-corruption and, at the University Rector's direction, conduct checks on possible violations of these requirements.

- At the University Rector's direction, to conduct checks on the organization's anti-corruption activities in the University's departments.

- To monitor and control the implementation of legislation on ethical conduct, conflict of interest prevention and resolution in the activities of University employees.

- To receive written explanations from University employees regarding circumstances that may indicate violations of ethical conduct rules, conflict of interest prevention and resolution, and other requirements and restrictions stipulated by the current legislation and the anti-corruption program.

- To initiate official investigations, take measures to hold individuals accountable for committing corruption-related or corruption-associated offenses.

- To prepare and submit an annual report to the University Rector on the implementation of the anti-corruption program (in the first decade of December).

- To cooperate with individuals who conscientiously report possible corruption-related or corruption-associated offenses.

- To provide explanations, guidance, and consulting assistance on matters related to ethical conduct, conflict of interest prevention and resolution, and corruption prevention and detection within University units and with University contractors.

- To receive written and verbal explanations from University employees regarding the performance of their assigned functions and tasks, including during preliminary investigations of facts that may indicate violations of anti-corruption legislation.

8.2.2. In the event of detecting signs of a corrupt or corruption-related offense or receiving a report on a corruption violation, the Authorized Person initiates an official investigation.

8.2.3. The materials obtained during the investigation are reported to the University Rector by the Authorized Person, who takes measures to hold the responsible individuals accountable. In cases where signs of a criminal or administrative offense are detected, the University Rector also informs the specially authorized entities in the field of anti-corruption.

9. Monitoring and Control of Compliance with the Anti-Corruption Program

9.1. Due to the possibility of changes over time in corruption risks and other factors affecting the University's activities, the University conducts monitoring of the implemented adequate measures to prevent corruption, ensures their compliance, and revises and enhances them if necessary.

9.2. The University ensures the implementation of measures that are necessary and justified to prevent and counteract corruption in the University's activities.

9.3. The development of such measures and the monitoring of their implementation are provided by the Authorized Person, taking into account the requirements of this anti-corruption program.

9.4. The analysis of compliance by University employees with the requirements of anti-corruption legislation, this anti-corruption program, or other University documents on corruption prevention is carried out by the Authorized Person.

9.5. The Authorized Person informs the University Rector about the confirmation of employee involvement in legal violations based on the results of the analysis by submitting an official memorandum. If necessary, the Authorized Person may initiate the need for other control methods (such as conducting a departmental review, initiating a disciplinary investigation, etc.).

9.6. The Authorized Person informs the University Rector about the results of the analysis.

9.7. The investigation of specific areas of University activities is conducted by the Authorized Person with the aim of improving existing processes to minimize existing corruption risks based on the principles defined in this anti-corruption program.

9.8. Anti-corruption audits may be initiated by the Authorized Person at their discretion or upon the directive of the University Rector.

10. Confidentiality and protection of employees providing information to the Authorized Person about intention to commit corruption offenses or reporting corruption-related offenses committed by other employees or individuals.

10.1. The University requires its employees to comply with this anti-corruption program, informing them of its key principles, requirements, and sanctions for violations.

10.2. Safe, confidential, and accessible methods for informing the University Rector, or the Authorized Person (written statements addressed to the Rector or the Authorized Person or personal appeals; notifications via phone or fax, email, and others) are organized within the University regarding instances of bribery from individuals providing services on behalf of commercial organizations. The Rector or the Authorized Person may receive suggestions for improving anti-corruption measures and control, as well as requests from employees and third parties.

10.3. The University consistently provides training on reporting corruption-related issues, including:

- Regularly conducting information campaigns aimed at shaping the psychological disposition of employees towards rejecting corruption as a means of problem-solving.

- Increasing the legal awareness of employees, particularly regarding their rights and freedoms, mechanisms for exercising them, confidentiality, and legal means of protecting whistleblowers.

- Explaining the most important anti-corruption measures implemented in the country, provisions of anti-corruption legislation, including the identification of types and forms of corrupt behavior.

- Systematically conducting educational events regarding behavioral models in situations with potential corruption risks.

10.4. The University ensures confidentiality by implementing the following conditions:

- Information about a whistleblower (a person who assists in preventing and combating corruption) can only be disclosed with their consent, except as required by law.

- Reports of violations of the law may be made by University employees without disclosing their identity (anonymously).

- All information regarding whistleblowers and corrupt behavior of University employees received from University staff or other individuals is considered confidential.

- The consideration of reports of corrupt behavior by employees is carried out in accordance with the provisions of Article 53 of the Law.

- Anonymous reports of violations of the law are subject to review if the information in them pertains to a specific individual, and contains verifiable facts.

- Anonymous reports of violations of the law must be verified within a period not exceeding fifteen days from the date of receipt. If it is not possible to verify the information contained in the report within this period, the University's Rector extends the review period to thirty days from the date of receipt.

10.5. Individuals who provide assistance in preventing and combating corruption are protected by the state.

10.6. An individual or a member of their family cannot be dismissed or coerced into dismissal, subjected to disciplinary action, or subjected to negative influence measures (such as transfer, evaluation, change of working conditions, denial of appointment to a higher position, reduction of salary, etc.) or the threat of such measures as a result of reporting violations of the law and the requirements of this Anti-Corruption Program by them or another person.

10.7. In the event that the information contained in the report regarding violations of the law and the current anti-corruption program is confirmed, the University's Rector takes measures to terminate the identified violation, eliminate its consequences, and hold the responsible individuals accountable. In cases where there are indications of a criminal or administrative offense, relevant authorities in the field of combating corruption are also informed.

11. Informing Employees of the Authorized Person about the Occurrence of Real or Potential Conflicts of Interest, and the Procedure for Resolving Identified Conflicts of Interest

11.1. University employees are required to:

- Take measures to prevent the occurrence of real or potential conflicts of interest.

- Report, no later than the next working day from the moment they became aware of or should have become aware of the existence of a real or potential conflict of interest, to their immediate supervisor.

- Refrain from taking actions and making decisions in situations of real conflicts of interest.

- Take measures to resolve real or potential conflicts of interest.

External resolution of a conflict of interest is achieved through:

- Removing the person from performing a task, taking specific actions, making decisions, or participating in such activities in situations of real or potential conflicts of interest.

- Applying external control over the performance of specific tasks, actions, or decision-making by the individual.

- Restricting the individual's access to certain information.

- Revising the scope of the person's official duties.

- Transferring the individual to a different position.

- Dismissing the individual.

11.2. The head of the structural unit in which an employee with a conflict of interest works shall submit a proposal to the University's Rector for resolving the conflict of interest of the subordinate employee by submitting an official memorandum. The memorandum shall include a justification for the necessity of applying the selected measure.

11.3. The head of the structural unit has the right to consult with the Authorized Person to obtain preliminary advice on the selection of the optimal way to resolve the conflict of interest.

12. Providing individual consultations by the Authorized Person to University employees on anti-corruption standards and procedures and conducting training to enhance their qualifications in the field of corruption prevention and counteraction.

12.1. University employees may, during working hours, contact the Authorized Person or send a written request to the Authorized Person for clarification and consultative assistance regarding conflict of interest prevention and resolution, as well as the prevention and detection of corruption within the University.

12.2. To promote a proper level of anti-corruption culture, newly hired University employees are introduced to the requirements of this anti-corruption program and related documents. Periodic informational events are organized for University employees.

12.3. Adherence to the principles and requirements of this anti-corruption program by University employees is taken into account when forming a personnel reserve for promotion to higher positions and in cases of disciplinary measures.

13. Procedure for Conducting Periodic Training of University Employees in the Prevention and Combating of Corruption

13.1. The purpose of enhancing the qualifications of University employees is to provide them with fundamental knowledge of anti-corruption legislation, overcome legal nihilism, and enhance the legal culture among University staff.

13.2. The Authorized Person has the right to initiate the necessity of conducting seminars, meetings, and other events aimed at explaining the content of anti-corruption legislation to University employees and improving their understanding of its specific requirements, to be presented to the University's Rector.

13.3. To conduct qualification enhancement activities in the field of corruption prevention, specialists from government authorities, local self-government bodies, civil society organizations, and international organizations may be involved.

14. Taking Action in Response to the Discovery of Corruption or Corruption-Related Violations at the University

14.1. In the event of detecting evidence of a University employee's violation of anti-corruption legislation, the Authorized Person takes the following measures:

- Initiates, according to the University's established procedure, the application of disciplinary measures when there is sufficient grounds.

- Initiates, according to the University's established procedure, the implementation of control measures prescribed by the current Anti-Corruption Program to investigate the identified facts with the purpose of confirming or disproving information regarding potential violations of anti-corruption legislation by the University employee.

- Informs, according to the University's established procedure, the specially authorized entities in the field of anti-corruption about the identified violations so that they can take actions as provided by the law.

14.2. Individuals found responsible for violating the requirements of the current Anti-Corruption Program and the Law may be subject to disciplinary, administrative, civil, and criminal liability. Such actions may be initiated by the University's Rector, law enforcement authorities, or other relevant parties in accordance with the procedures and legal grounds established by Ukrainian legislation, special regulatory acts, and employment contracts.

14.3. Disciplinary penalties may be imposed on University employees who have committed violations or failed to fulfill the requirements of anti-corruption legislation, in accordance with the norms of labor legislation and the specific procedures established by the University.

14.4. The University declares that no employee will face sanctions (including dismissal, demotion, or loss of bonuses) if they report an anticipated case of corruption, refuse to give or accept bribes, engage in commercial bribery, or provide mediation in bribery. This protection extends to cases where the refusal results in an opportunity loss for the University or the non-receipt of commercial and competitive advantages.

14.5. An individual who commits a corrupt or corruption-related offense but has not been sentenced or penalized by a court with the deprivation of the right to hold specific positions or engage in activities related to the functions of the state or local self-government or equivalent activities shall be subject to disciplinary responsibility.

14.6. To identify the causes and conditions contributing to the commission of corrupt or corruption-related offenses or the failure to comply with the requirements of the anti-corruption program, as well as the Law in other ways, at the request of a specially authorized entity in the field of anti-corruption or the prescription of the National Agency for the Prevention of Corruption, the University Rector may decide to conduct an internal investigation regarding the individual who committed such an offense.

14.7. An individual against whom a protocol for an administrative offense related to corruption is drawn up, unless otherwise provided by the Constitution and laws of Ukraine, may be suspended from performing official duties by the decision of the University Rector until the case is adjudicated by the court.

14.8. If the proceedings in a case of an administrative offense related to corruption are terminated due to the absence of an event or elements of an administrative offense, the individual suspended from performing official duties shall be compensated with an average salary for the period of forced absence associated with such suspension.

14.9. Cooperation with law enforcement agencies is an important indicator of the University's commitment to the declared anti-corruption standards of behavior.

14.10. Such cooperation can take various forms:

- Reporting cases of corrupt offenses to the relevant law enforcement agencies that have become known within the University.

- Assisting authorized representatives of supervisory and law enforcement authorities during their inspections of the University's activities related to corruption prevention and counteraction.

- Assisting authorized representatives of law enforcement agencies in measures to prevent or investigate corruption crimes, including operational and investigative actions.

- Non-interference by the University's management and employees in the performance of official duties by officials of the judiciary or law enforcement agencies.

15. Amendment Procedure for the Anti-Corruption Program

15.1. In the event of identifying ineffective provisions within this anti-corruption program or related anti-corruption measures of the University, or in response to changes in the requirements of current Ukrainian legislation in the field of anti-corruption policy, the University's Rector organizes the development and implementation of an action plan to review and amend this anti-corruption program and/or anti-corruption measures.

15.2. The Anti-Corruption Program and any changes to it are approved by the University's Academic Council and come into effect through a decree issued by the University's Rector.

15.3. The text of the Anti-Corruption Program is published on the official website of the University.