

APPROVED

**Chairman of the State Property Fund of
Ukraine**

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**INTEGRITY POLICY OF THE STATE PROPERTY
FUND OF UKRAINE**

Kyiv 2024

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VISION

Our vision is to become a leader in the field of state property management, meeting the highest standards of efficiency, transparency, and social responsibility.

This vision motivates us to work diligently every day and helps us achieve significant success in the management of state property.

MISSION

We are committed to promoting Ukraine's economic prosperity and improving the well-being of our citizens by maximizing the value of state property.

CORPORATE VALUES***Transparency***

We are committed to being as transparent as possible in our decision-making and interactions, both within our team and with our partners.

Efficiency

By focusing on results, we strive to achieve maximum efficiency in the management of state property through continuous self-improvement. For us, it is not only the completion of a task that matters, but also the way in which that result was achieved.

Social Responsibility

We recognize that our effectiveness is key to ensuring a high quality of life for the citizens of Ukraine, and therefore promoting sustainable development is one of our priorities.

Innovation

We are convinced that innovation is a prerequisite for our success, and therefore we actively encourage creativity and the use of modern technologies in achieving our goals.

GENERAL PROVISIONS

This Policy is based on the provisions of current legislation and aims to develop a corporate culture and establish high standards of professional ethics, guided by our vision, mission, and corporate values.

This Policy is based on the fundamental principles of public morality and professional ethics.

We conduct our activities in strict compliance with the laws of Ukraine and the laws of other countries where the Fund or enterprises under the Fund's management may operate.

This Policy applies to all, without exception, employees of the Fund, regardless of the position they hold. Employees must adhere to this Policy even when they are outside the Fund and during their time off from performing their professional duties.

Managers at all levels must demonstrate commitment to corporate values and serve as role models for their teams.

This Policy enter into force upon its approval. The Fund provides familiarization of employees and all interested parties with the provisions of the Policy by posting it on the Fund's official website. It is a dynamic document and may be supplemented and changed to address new challenges and circumstances.

An employee of the Fund must be familiarized with this Policy on their first day of work before commencing their duties. Refusal of the employee familiarization with this Policy does not exempt them from compliance with the provisions.

PATRIOTISM

An employee of the Fund must serve the interests of the Ukrainian people honestly and devotedly and contribute to the formation of a positive image of Ukraine. Official duties must be performed using the state language. Work-related communication among employees of the Fund may not be conducted in the language of the aggressor country. An employee of the Fund must respect national customs and traditions, as well as show respect for the state symbols of Ukraine.

THE FUND AND ITS EMPLOYEES

Vision, Mission, and Corporate Values

We expect all employees to share the Fund's vision, mission, and corporate values. Honesty, integrity, respect, and diligence form the foundation for daily interactions between employees and the Fund.

Equal Opportunity and Respect for Human Rights

The Fund's relationships with its employees are based on the principles of respecting human rights and ensuring equal opportunities for all employees, regardless of race, skin color, national or ethnic origin, religion, marital status, sexual orientation, age, gender, or health status. The Fund is committed to creating an inclusive environment and will ensure equal employment opportunities for veterans and people with disabilities.

Behavior and Responsibility

Employees' behavior should create a positive image and reputation for the Fund. Employees of the Fund must refrain in every possible way from any actions that could discredit or harm the Fund's reputation.

Culture of Communication and Interaction

Managers at all levels must create and actively foster an environment in which employees are aware of their responsibilities, voluntarily comply with the provisions of this Policy, and freely raise and address issues with management without fear of reprisal.

Communication among Fund employees must be based on the rules of politeness, mutual trust and respect for others. Any displays of aggressive behavior, rudeness, or pressure are unacceptable. Any insinuations, gestures, or statements with sexual undertones are prohibited. Employees of the Fund share responsibility for creating a comfortable work environment: they show mutual care and support for colleagues and strive for empathy.

Development and Support

The Fund strives to take all possible measures to prevent discrimination against women and ensure equal employment rights for men and women. The Fund fully supports and encourages the continuous professional and personal development of its employees.

Self-reflection

If a Fund employee finds themselves in a difficult situation in terms of professional ethics in the course of their professional duties, they should ask themselves:

- Is this behavior lawful?
- Do my decisions or actions align with the Fund's Integrity Policy, vision, mission, or corporate values?
- Does this align with my personal values?
- Would I feel comfortable if my family, colleagues, or the public found out about this decision?
- Is this safe?
- Could this endanger anyone or lead to any negative consequences?
- Is the decision I've made the best one compared to other possible courses of action?

OCCUPATIONAL HEALTH AND SAFETY

We sincerely strive to avoid any situations that pose a threat and may negatively impact the lives and health of our employees. While performing their professional duties, Fund employees must act cautiously and prudently to avoid any risks that may pose a threat.

Under martial law, workplace safety and the safety of the work environment are part of each of our personal responsibilities, therefore everyone is obligated to properly comply with legislation in the field of health care, epidemiological safety requirements, air raid alerts, and other relevant regulations. The Fund encourages employees to learn first aid procedures and to enhance their qualifications in occupational health and safety. In the event of acute epidemiological situations, the Fund provides its employees with personal hygiene and protection products.

We are convinced that, through joint efforts, we can create a safe and comfortable work environment that will not only help protect people's health and lives but also increase productivity and achieve the Fund's strategic goals.

THE FUND AND ITS BUSINESS PARTNERS

The Fund seeks to establish cooperation with international organizations, state bodies, and non-governmental organizations of foreign countries regarding the implementation of state policy in the areas of privatization, leasing, use, and disposal of state property within the scope of its authority, the management of the state's corporate rights, as well as in the area of state regulation of property valuation, property rights, and professional appraisal activities, that share our vision, mission, and corporate values, and have an impeccable business reputation.

The core principles of our partnership are:

- Transparency: we conduct our business openly and share information with our partners.
- Interaction: we value our partners' opinions and actively collaborate with them to achieve common goals.
- Trust: we build partnerships based on mutual trust and respect.
- Responsibility: we are responsible for our obligations to our partners.

The Fund does not condone:

- Violations of laws or ethical norms by companies.
- Activities by companies related to fraud or corruption.
- Violations by companies of the principles of economic competition.

In the event of any misunderstandings with partners, the Fund will take steps to resolve them through negotiation, compromise, or mediation. We strive to maintain constructive cooperation and positive relationships with all our partners.

The Fund strives for mutually beneficial cooperation with its partners and makes every effort to fulfill its contractual obligations in good faith and responsibly.

We are convinced that by adhering to these principles, we will be able to achieve the development of Ukraine's economy.

THE FUND AND THE STATE

The Fund, recognizing the social significance of the results of its activities and feeling a sense of responsibility toward the state, is guided by the following principles:

- Integrity: we act honestly, openly, and transparently.

- Transparency: We provide access to information about our activities in accordance with applicable law.
- Professionalism: we strive for the highest level of professionalism in our work and cooperation with authorities.
- Unwavering commitment to fulfilling our obligations: we conscientiously carry out the tasks defined by law.

The Fund provides information required by law in a timely manner in response to requests from state authorities in the amount and in the manner prescribed by applicable law. We do not conceal, withhold, or distort the requested information.

At the same time, when providing any information in response to a request from another state authority, an employee must ensure that the information is reliable and accurate.

The Fund strives to ensure the growth of state assets, but under no circumstances will we compromise integrity. We will not participate in any questionable or corrupt schemes.

Fund employees must refrain from making unjustified criticisms of other state authorities. We strive for constructive cooperation with all authorities to achieve our common goals.

We are convinced that adherence to these principles will contribute to the development of Ukraine's economy and the well-being of its citizens.

THE FUND'S RESOURCES

Fund employees must be careful in using the Fund's property and resources, refraining from using them for their own needs, interests, or personal gain. They are obligated to prevent fraud and corruption when using the Fund's resources and to report to their immediate supervisor all instances of theft, misappropriation, or misuse of the Fund's resources that come to their attention.

Remember: a responsible attitude toward the Fund's property and resources is not only a duty but also a contribution to the common cause of our institution's development and the well-being of Ukraine.

THE FUND'S INFORMATION

Confidentiality and Limited Access to Information

All information is public, except for that which is classified by law as restricted. Fund employees are required to comply with information laws when creating, collecting, receiving, storing, using, disseminating, and protecting information.

During their employment with the Fund and after termination, employees are required to maintain the confidentiality of internal information and take measures to prevent unauthorized disclosure.

Interaction with the Media

The Fund strives to interact transparently with the media. Only Fund employees authorized by management may make public statements on behalf of the Fund or provide documents or information to the media. Employees must avoid statements or comments that contradict the Fund's official position or could be perceived as the Fund's official position and could harm its reputation.

Protection of Personal Data

The Fund respects the right of its employees and business partners to privacy and ensures compliance with personal data protection laws. Without prior authorization, the Fund and its employees are not permitted to collect or process the personal data of other employees, business partners, or other individuals. All employees must exercise caution and discretion when handling personal information and may not use or disclose it inappropriately.

EMPLOYEE BEHAVIOR ON SOCIAL NETWORKS

The Fund supports the principle of conscious and responsible use of social media by its employees. We value freedom of speech and the right to express one's own opinion.

However, it is important to remember that:

- The Fund does assume responsibility for personal statements of its employees.
- Employees acting in their personal capacity do not have the authority to officially represent the Fund in the media.
- The Fund reserves the right not to endorse the opinions and views expressed by its employees on social media.

Recommendations for employees of the who use social media:

- Familiarize yourself with the rules of the social media platforms you use.
- Keep in mind that your actions on social media can have consequences for both you and the Fund.
- Refrain from making rude, offensive, or discriminatory comments.
- Do not post confidential information about the Fund or its activities.
- Be polite and respectful toward other social media users.
- Remember that you represent the Fund even when using social media outside of work hours.

The Fund recommends that its employees use social media cautiously and responsibly. We are confident that by following these guidelines, you will be able to use social media for communication, self-development, and promoting the Fund's positive image.

Remember: your online behavior can have far-reaching consequences, so be mindful and protect your reputation and that of the Fund.

COMPUTER SYSTEMS AND INFORMATION SECURITY

All of the Fund's information resources, computer, server, network, and office equipment are the property of the Fund. Employees must use this equipment solely for the performance of their job duties. To ensure the protection of information in the information resources, Fund employees must use strong access passwords and change them regularly.

The Fund reserves the right to monitor the use of information resources to ensure their security and effective use. Fund employees are prohibited from sharing their work computers and passwords for accessing information resources with others.

The Fund's corporate email is intended for official correspondence among its employees. Employees should be careful when opening emails from unknown senders, following links in emails, and installing software of unknown origin on their work computers.

The security of the Fund's information resources is the shared responsibility of all employees. Everyone must adhere to established rules and policies regarding information security to prevent incidents and protect information.

THE FUND AND ENVIRONMENT

The Fund strives to minimize the negative impact of its activities and those of the enterprises under its management on the environment.

The Fund is open to transparent cooperation with state authorities and civil society organizations to promote environmental protection and ensure sustainable development.

INTOLERANCE TO CORRUPTION

The Fund declares zero tolerance for any manifestations of corruption. We strive to create an atmosphere of intolerance toward corruption and foster a culture of ethical conduct in all areas of the Fund's operations.

Key principles of anti-corruption at the Fund:

- Unconditional compliance with the requirements and standards of the Fund's Anti-Corruption Program.
- Demonstration of a smart initiative in implementation anti-corruption measures by managers at all levels.
- Setting an example for subordinates by adhering to standards of ethical conduct.
- Prohibiting the offering, giving, or accepting of any privileges, benefits, or other advantages that could influence the objectivity and fairness of business decisions.
- Zero tolerance for any manifestations of corruption and abuse in the course of procurement, production, and any other activities.
- A strict prohibition on the participation of employees, as well as any persons acting on behalf of or in the interests of the Fund, in corrupt practices and abuses.

The Fund permits the acceptance of gifts that are consistent with generally accepted notions of hospitality and comply with anti-corruption laws.

However, in any case, before offering, giving, or receiving gifts or any form of business hospitality, a Fund employee is required to:

- Inform their supervisor of this.
- Seek approval or consultation from the Authorized Unit for the Prevention and Detection of Corruption.

To combat corruption, the Fund:

- Develops and approves an Anti-Corruption Program.
- Implements other tools to identify and prevent corruption risks.

The Fund is convinced that through joint efforts, we can create an atmosphere of zero tolerance for corruption and ensure transparent and accountable activities for the benefit of the state.

Remember: each of us can contribute to the fight against corruption!

PREVENTING CONFLICTS OF INTEREST

The Fund respects its employees' right to privacy. However, private interests must not negatively impact the performance of professional duties.

A conflict of interest arises when an employee's private interests overlap with those of the Fund or its partners. This can lead to biased decision-making, abuse of position, and a loss of trust in the Fund.

To avoid conflicts of interest, Fund employees:

- Must avoid situations where their private interests conflict with the interests of the Fund or its partners.
- Must notify their immediate supervisor of the occurrence or risk of any situations involving a conflict of interest.
- Must contact the Authorized Unit for the Prevention and Detection of Corruption or the National Agency for the Prevention of Corruption if there are doubts as to whether a conflict of interest exists.

To determine a conflict of interest:

- Ask yourself:
 - Could this activity be seen by me or others as an attempt to personally benefit at the expense of the Fund?
 - Would this activity damage my reputation, negatively impact my ability to perform my job, or potentially harm the Fund?

- Would this activity harm the Fund or me if it is published in the media or social media?
- If the answer is “yes” to any of these questions, then such relationships or situations may lead to a conflict of interest, and Fund employees should avoid them.

In matters of preventing and resolving conflicts of interest, Fund employees are guided by:

- The provisions of the Law of Ukraine “On Preventing Corruption.”
- The Fund’s internal documents governing conflicts of interest.

If any questions or doubts arise regarding the application of the law or the Fund’s internal documents, the employee should contact the Authorized Unit for the Prevention and Detection of Corruption or the National Agency for the Prevention of Corruption.

Remember: a conflict of interest can have serious consequences for the reputation of the Fund and its employees. Therefore, it is important to be vigilant and take steps to avoid them.

INTEGRITY AND RELIABILITY OF REPORTING

The Fund ensures the integrity and reliability of its reporting, which is crucial for the successful management of state assets and the trust of our partners. Accurate and transparent information about the Fund’s assets and financial performance is essential for making informed management decisions.

The Fund’s accounting and reporting are based on the principles of transparency, reliability, accuracy, and integrity.

The Fund strives to demonstrate a high level of professionalism in all aspects of its activities, particularly in accounting and the preparation of financial statements.

We are convinced that the integrity and reliability of reporting are essential components of successful management of state assets and the Fund's prosperity.

POLITICAL AND RELIGIOUS ACTIVITY

The Fund respects the political views and religious beliefs of its employees. We value diversity and inclusivity and strive to create a comfortable and supportive work environment for everyone.

However, the Fund does not participate in political and/or religious activities. We strive for neutrality and professionalism in our work, ensuring that politics or religion do not interfere with our activities.

This means that:

- Employees are prohibited from engaging in political or religious propaganda while performing their job duties and while on the Fund's territory.
- Employees may display religious symbols in the workplace in accordance with their beliefs, provided that this does not cause offense to others and does not interfere with the performance of their job duties.

The Fund strives to create an atmosphere where every employee can feel comfortable and freely focus on performing their professional duties without fear of judgment or discrimination based on their political or religious beliefs.

SEEKING ADVICE OR GUIDANCE

If an employee has questions regarding the interpretation and application of the Policy's provisions and is unsure of the correct course of action in a specific situation, that employee has the right to seek advice or consultation:

their immediate supervisor;

the Human Resources Department;

to the Authorized Unit for the Prevention and Detection of Corruption.

The Fund guarantees that all questions regarding the interpretation, application, and compliance with the provisions of the Integrity Policy will be addressed in a timely and appropriate manner. The Fund guarantees full confidentiality to employees who seek clarification regarding the application of the Policy. We assure you that all consultations and clarifications will be provided in accordance with the principles of confidentiality and respect for employees' personal information.

NOTICE OF VIOLATION

The Fund strives to create an environment of zero tolerance for any violations of the Integrity Policy. If Fund employees become aware of a violation of this Policy, they must report it to their supervisor. If an employee believes that their immediate supervisor has violated or is involved in a violation of the Integrity Policy, they must report it to Human Resources.

Remember: The Fund's Integrity Policy is a tool designed to help Fund employees act ethically and responsibly. If you have any questions or concerns, do not hesitate to seek guidance.

**Head of the Department for the Prevention and
Detection of Corruption**

Vyacheslav KOSTENKO