

## **APPROVED**

Order of the State Specialized Forest Protection Enterprise "Kharkivlisozakhyst"  
of June 26, 2020 No. 37

## **ANTI-CORRUPTION PROGRAM**

of the State Specialized Forest Protection Enterprise "Kharkivlisozakhyst"

### **Preamble**

This Anti-Corruption Program of the State Specialized Forest Protection Enterprise "Kharkivlisozakhyst" (hereinafter - the Legal Entity) declares that its employees, officials, and management adhere to the principle of "zero tolerance" towards any manifestations of corruption in their internal activities and legal relations with business partners, government authorities, and local self-government bodies. They will take all necessary legal measures to prevent, detect, and combat corruption and related actions (practices).

### **I. General Provisions**

1. The Anti-Corruption Program is a set of rules, standards, and procedures aimed at detecting, preventing, and combating corruption within the Legal Entity.
2. The Anti-Corruption Program establishes standards and requirements not lower than those prescribed by the Law of Ukraine "On Corruption Prevention" (hereinafter - the Law) and the Model Anti-Corruption Program approved by the National Agency for Corruption Prevention.
3. The terms used in the Anti-Corruption Program have the meanings defined in the Law.
4. The Anti-Corruption Program was approved by the order of the head of the Legal Entity after discussions with employees and officials of the Legal Entity.
5. The text of the Anti-Corruption Program is permanently accessible to employees, officials, and business partners of the Legal Entity and is posted on the website of the Legal Entity - [lisozahyst.org.ua](http://lisozahyst.org.ua).

### **II. Scope of Application and Responsible Persons**

1. The Anti-Corruption Program is mandatory for all employees of the Legal Entity, including officials at all levels and the head.
2. The Anti-Corruption Program also applies to the Legal Entity's relations with business partners, including government authorities and local self-government bodies.
3. Measures to implement the Anti-Corruption Program within their competence are carried out by:
  - The head of the Legal Entity (hereinafter - the head);
  - The officer responsible for implementing the Anti-Corruption Program (hereinafter - the Authorized Officer);
  - Officials and other employees of the Legal Entity.

### **III. Anti-Corruption Measures**

1. The Legal Entity ensures the development and implementation of measures necessary and sufficient to prevent, detect, and counteract corruption in its activities.
2. Anti-corruption measures include:
  - Periodic assessment of corruption risks;
  - Implementation of anti-corruption standards and procedures.
3. Key anti-corruption standards and procedures:

- Familiarization of new employees with the Anti-Corruption Program and conducting training sessions;
- Anti-corruption screening of business partners;
- Compliance requirements with the Anti-Corruption Program;
- Criteria for selecting business partners;
- Restrictions on political and charitable contributions;
- Mechanisms for reporting violations and ensuring confidentiality and protection of whistleblowers;
- Prevention and resolution of conflicts of interest;
- Gift acceptance limitations;
- Monitoring and control over compliance with the Anti-Corruption Program.

#### **IV. Professional Ethics Standards**

1. Employees must adhere to recognized ethical norms and respect political, ideological, and religious beliefs.
2. Employees act objectively, disregarding personal interests, and fulfill their duties responsibly.
3. Employees must not disclose or misuse confidential information.

#### **V. Rights and Responsibilities of Management and Employees**

1. Employees and management have the right to:
  - Propose improvements to the Anti-Corruption Program;
  - Seek consultations from the Authorized Officer.
2. Employees and management must:
  - Comply with the Law and Anti-Corruption Program;
  - Report violations or potential conflicts of interest.
3. Employees and management are prohibited from:
  - Using their position for undue personal gain;
  - Accepting or offering bribes or inappropriate gifts.

#### **VI. Role of the Authorized Officer**

1. The Authorized Officer is appointed by the head and must meet legal and ethical requirements.
2. The Authorized Officer's responsibilities include:
  - Overseeing implementation of anti-corruption measures;
  - Conducting risk assessments and compliance audits;
  - Providing training and consultations;
  - Ensuring confidentiality and whistleblower protection.

#### **VII. Reporting and Oversight**

1. The Authorized Officer submits an annual report to the management on the implementation of anti-corruption measures.
2. Internal and external corruption risk assessments are conducted periodically.
3. Any identified violations are subject to internal investigation.

#### **VIII. Confidentiality and Whistleblower Protection**

1. Employees reporting corruption are guaranteed confidentiality and protection.

2. Retaliation against whistleblowers is strictly prohibited.

## **IX. Conflict of Interest Resolution**

1. Employees must immediately report real or potential conflicts of interest.
2. Conflicts of interest are resolved by reassigning duties or other appropriate measures.

## **X. Disciplinary Actions**

1. Violations of the Anti-Corruption Program are subject to internal investigations and disciplinary action.
2. Employees found guilty of corruption-related offenses may be subject to dismissal and legal consequences.

## **XI. Amendments to the Anti-Corruption Program**

1. The Anti-Corruption Program is reviewed periodically based on risk assessments and employee feedback.
2. Any amendments require discussion and approval by management and stakeholders.

### **Authorized Officer for Anti-Corruption Activities**

V.S. Kirsanko