



Anti-Corruption Program

**of the State Enterprise
“Polygraph Combine “Ukraine”
for securities’ production”**

Approved by
order dated 08.07.2022 No. 127

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Annex 1. Obligations to comply with the requirements of the Anti-Corruption Program of the State Enterprise "Polygraph Combine "Ukraina" for securities' production"

By this Anti-Corruption Program (hereinafter referred to as the Program) State Enterprise "Polygraph Combine "Ukraina" for securities' production" (hereinafter referred to as Polygraph Combine "Ukraina" or the Company), being aware of the responsibility for affirming the values of the rule of law and integrity, striving to ensure its sustainable development, taking care of its own business reputation, to encourage the use of fair commercial practices, as well as in the interests, in particular, but not exclusively, of employees, business partners, clients, states that management bodies, officials and employees in their activities, as well as in legal relations with business partners, state authorities, local governments, other legal entities and individuals shall be guided by the principle of zero tolerance to corruption in any of its forms and manifestations and take (will take) all measures to prevent, detect and counteract corruption provided for by the legislation and this Program.

Polygraph Combine "Ukraina" declares its principled position and condemns corruption as an illegal and unethical way of doing business.

I. General provisions

1. Terms Definition

1. In this Program, the terms below are used in the following meanings:

business hospitality shall mean representative events (for example, business breakfasts, lunches, dinners, receptions, tastings, other events (conferences, cultural and sports events)), recovery of travel expenses, accommodation, other types of expenses that are carried out by Polygraph Combine "Ukraina" or in relation to Polygraph Combine "Ukraina" for the purpose of establishing or improving business relations or for other purposes related to the activities of the Company;

business relations shall mean relations between the Company and the business partner related to the business, professional or economic activities of Polygraph Combine "Ukraina", which arose on the basis of a transaction or the implementation of other activities by Polygraph Combine "Ukraina" and provide for the duration of existence after their establishment;

business partners shall mean legal entities and/or individuals with those Polygraph Combine "Ukraina" maintains, enters into or intends to enter into business relations;

incentive payments shall mean unofficial and illegal payments to officials in order to facilitate/speed up/simplify or, in certain cases, properly perform the procedures established by law, that Polygraph Combine "Ukraina" has the legal right to receive without making such payments;

corruption risk shall mean the probability of committing a corruption or corruption-related offense, other violation of the Law of Ukraine On Prevention of Corruption, that will negatively affect the activities of Polygraph Combine "Ukraina";

illegal benefit shall mean cash or other property, advantages, benefits, services, intangible assets, any other benefits of an intangible or non-monetary nature that are offered, promised, provided or received without legal grounds;

zero tolerance for corruption shall mean absolute intolerance to corruption in any of its manifestations;

representative of Polygraph Combine "Ukraina" shall mean a person authorized in accordance with the established procedure to act on behalf of or in the interests of the Company in relations with third parties;

Authorized Person shall mean an official of Polygraph Combine "Ukraina", appointed by the order of the director, who is responsible for the implementation of the Anti-Corruption Program

and implements measures to prevent and detect corruption and corruption-related offenses and anti-corruption measures;

Authorized management body shall mean the Ministry of Economy of Ukraine that manages Polygraph Combine “Ukraina”.

Management body shall mean Supervisory Board of the State Enterprise Polygraph Combine “Ukraina” for securities’ production (hereinafter referred to as the Supervisory Board) established in accordance with the requirements of the current legislation of Ukraine.

2. Other terms in this Program are used in the meanings given in the Law of Ukraine On Prevention of Corruption.

2. Purpose and scope of application

1. The purpose of this Program is to ensure the functioning of an effective system for preventing and combating corruption, compliance of the activities of Polygraph Combine “Ukraina” with the requirements of anti-corruption legislation, taking into account the best international practices.

2. This Program establishes a set of measures (rules, standards and procedures) for preventing, detecting and combating corruption in the activities of Polygraph Combine “Ukraina”, not less in scope and content than provided by the Law of Ukraine On Prevention of Corruption and the Standard anti-corruption program of a legal entity approved by the order of the National Agency for the Prevention of Corruption.

3. Measures to prevent, identify and eliminate or minimize corruption risks are recognized as a priority in the activities of Polygraph Combine “Ukraina”.

4. This Program is mandatory for the head, members of the management body, officials, employees, representatives of Polygraph Combine “Ukraina” and persons who are trained at the Company or perform certain work on the basis of civil law contracts concluded with Polygraph Combine “Ukraina”.

5. This Program shall be applied in all areas of the Company activity, including in relations with business partners, officials, state and local government bodies, other legal entities and individuals.

6. Provisions on mandatory compliance with and implementation of this Program shall be included in the internal labor regulations of the Company, regulations on structural units, all employment agreements, including contracts, and job descriptions.

7. This Program was approved by the order of the head of the Company after its discussion with officials and employees of Polygraph Combine “Ukraina”.

8. The text of this Program is permanently publicly available for employees, officials, the management body, representatives of Polygraph Combine “Ukraina”, as well as for its business partners.

3. Responsible leadership, business reputation and integrity

1. The head, members of the management body, officials of the Company undertake to form zero tolerance to corruption among the employees of Polygraph Combine “Ukraina” by personal example of ethical behavior, which is the basis of the business culture, daily business practices and business reputation of the Company.

2. The head and members of the management body of Polygraph Combine “Ukraina” undertake to demonstrate leadership and responsibility in relation to:

- 1) compliance with the requirements of anti-corruption legislation;
- 2) ensuring proper implementation, effective functioning, periodic analysis, timely review and improvement of the system for preventing and combating corruption at the Company in order to properly respond to corruption risks in the activities of Polygraph Combine “Ukraina”;
- 3) spreading a culture of zero tolerance for corruption in all areas of the Company's activities;
- 4) appointment to the position of a person responsible for the implementation of this Program (hereinafter referred to as the Authorized Person), providing him/her with proper material and organizational working conditions, assisting the Authorized Person in performing the tasks and functions provided for by the Law of Ukraine On Prevention of Corruption and this Program, ensuring the independence of activities of the Authorized Person;
- 5) encouraging officials to demonstrate leadership in preventing and combating corruption within their powers;
- 6) directing employees to support the Company's anti-corruption policy and make a personal contribution to the effectiveness of the corruption prevention and counteraction system;
- 7) informing on the policy of preventing and combating corruption both within the Company and in relations with business partners, officials, state authorities, local governments, and other legal entities and individuals;
- 8) providing in accordance with the Law of Ukraine On Prevention of Corruption conditions for reporting information on possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine On Prevention of Corruption;
- 9) compliance with the rights and guarantees of protection of whistleblowers provided for by the Law of Ukraine On Prevention of Corruption;
- 10) timely and proper response in accordance with the law to the facts of committing (possible committing) corruption or corruption-related offenses by members of the Company's management body, officials, employees.

4. Standards of professional ethics

1. The head of the Company, members of the management body, officials, Authorized Person, employees and representatives of Polygraph Combine “Ukraina” in the performance of their official (contractual) duties shall:

- 1) strictly adhere to the generally recognized ethical standards of conduct and the requirements of the Code of ethics and business behavior of an employee of the State Enterprise Polygraph Combine “Ukraina” for securities’ production”;
- 2) be tolerant and respectful as to the political views, ideological and religious beliefs of other persons;
- 3) act regardless of their personal interests, personal attitude towards any persons, their political, ideological, religious or other personal views or beliefs;
- 4) not disclose or use confidential information that has become known to them in relation to the performance of their official (contractual) duties, except in cases established by law;

5) competently, timely, effectively and responsibly perform official (contractual) duties, decisions and instructions of the management body and officials to whom they are subordinate, accountable or controlled, and shall not allow abuse and inefficient use of funds and property of the Company.

2. The head, members of the management body, officials, the Authorized Person, employees, representatives of the Company shall refrain from clearly criminal actions, decisions and instructions and take measures to cancel such decisions and instructions.

3. Officials, the Authorized Person, employees, representatives of the Company are obliged to refrain from executing decisions or instructions of the management that are clearly criminal.

4. In case of receiving decisions or instructions for execution that are clearly criminal, an official, employee, representative of the Company, or the Authorized Person must immediately notify the direct manager or the head of the Company and the Authorized Person in writing.

5. An official, employee or the Authorized Person may not be dismissed or forced to dismiss, brought to disciplinary responsibility, or subjected by the management to other negative measures of influence or threat of such measures of influence in connection with refusal to execute decisions or instructions that are clearly criminal.

6. Officials, employees of Polygraph Combine “Ukraine”, the Authorized Person may not be brought to disciplinary responsibility for refusing to participate in corruption acts, even if such refusal may lead to the loss of competitive advantage or potential benefits by the Company.

II. Rights, obligations, and prohibitions

1. Rights and obligations of the head, members of the management body, officials, employees (except for the Authorized Person) and representatives of the Company

1. The head of Polygraph Combine “Ukraine”, members of the management body, officials, employees and representatives of the Company have the right to:

- 1) provide proposals for improving this Program;
- 2) contact the Authorized Person for advice and explanations on the implementation of this Program, other internal documents of the Company on the prevention of corruption, anti-corruption legislation;
- 3) receive recommendations from the Authorized Person on further actions if the planned actions or decisions (transactions) may be a source of corruption risks.

2. The head of the Company, members of the management body, officials, employees and representatives of Polygraph Combine “Ukraine” are obliged to:

1) comply with the requirements of the Law of Ukraine On Prevention of Corruption, this Program and internal documents adopted for its implementation, as well as to ensure the implementation of this Program;

2) perform their official (contractual) duties, taking into account the legitimate interests of the Company;

3) immediately inform the Authorized Person or the head of the Company in accordance with the procedure provided for in this Program on cases of violation of the requirements of this Program

(or cases of incitement to such actions), commission of corruption or corruption-related offenses, or other violations of the Law of Ukraine On Prevention of Corruption by the head, members of the management body, officials, employees of the Company or existing or potential business partners;

4) immediately inform, in accordance with the procedure specified in this Program, about the occurrence of a real, potential conflict of interest; take measures to prevent and resolve a real or potential conflict of interest; do not take actions or make decisions in conditions of a real conflict of interest;

5) refrain from behavior that may be regarded as a willingness to commit a corruption or corruption-related offense related to the activities of Polygraph Combine "Ukraina";

6) inform the Authorized Person on the implementation and acceptance of business hospitality, giving and receiving gifts in accordance with the procedure established by the Company;

7) take into account and consider the recommendations of the Authorized Person.

2. Prohibited corruption practices

1. The head, members of the management body, officials, employees and representatives of the Company, and the Authorized Person are prohibited to:

1) accept an offer, promise or receive an undue benefit, as well as request to provide such benefit for themselves or another individual or legal entity for committing or not performing any actions using the position they occupy in the Company, or in connection with their activities in favor of the Company, in the interests of the one who offers, promises or provides such benefit, or in the interests of a third party;

2) abuse their powers, that is, intentionally, in order to obtain illegal benefits for themselves or another individual or legal entity, use their powers contrary to the interests of the Company;

3) offer, promise or provide (directly or through a third party) officials and/or their close persons, other individuals with illegal benefits for performing or not performing any actions/omissions using the power, official position, authority granted to them to obtain or maintain any benefits for Polygraph Combine "Ukraina";

4) take actions and make decisions in conditions of a real conflict of interest;

5) use any property of the Company or its funds in personal interests;

6) organize, mediate or personally make any cash or non-cash payments or settlements with business partners of the Company, other individuals or legal entities, if such payments or settlements are not provided for by law or transactions concluded by the Company;

7) influence directly or indirectly the decisions of employees of Polygraph Combine "Ukraina" in order to obtain illegal benefits for themselves or other persons;

8) perform any actions that directly or indirectly incite other employees and officials to violate the requirements of the Law of Ukraine On Prevention of Corruption or this Program;

9) give and receive gifts in violation of the requirements of the legislation and this Program regarding the provision and acceptance of business hospitality and gifts;

10) after dismissal or other termination of cooperation with the Company, disclose or use in any other way to their advantage information, including confidential information, which became known to them in relation to the performance of their powers, contractual obligations, except in cases established by law.

2. The Company prohibits the payment of incentive payments to officials, in particular in order to speed up any formal procedures related to obtaining permits, or making appropriate decisions in favor of Polygraph Combine “Ukraina”, or obtaining other benefits for the Company.

Payment for expedited proceedings paid to the account of a state authority or local government body, company, institution, organization, official, state/local budget, the amount and payment of which is provided for by law (for example, payment for expedited registration of patents) shall not be deemed an incentive payment.

An official, employee or representative of the Company to whom a request for an incentive payment is made shall be obliged to inform the person making such the request on the prohibition of its implementation, refuse to make such payment, and immediately inform his/her direct manager and Authorized Person about the request received.

If an official, employee or representative of the Company has any doubts about whether the payment belongs to the incentive payment and about prohibition of its implementation, such official, employee or representative of the Company should seek advice from the Authorized Person.

3. Prohibitions are valid without any territorial restrictions in the territory of any state, regardless of national traditions, local practices or competition conditions in force in that state.

III. Legal status of the Authorized Person

1. General provisions

1. The legal status of the Authorized Person is determined by the Law of Ukraine On Prevention of Corruption and this Program.

The Authorized Person shall be appointed by the head of the Company to a separate position in accordance with the labor legislation and the constituent documents of the Company.

The Authorized Person is subordinate, accountable and controlled by the head of the Company.

Requirements for a person who may be appointed as the Authorized Person are established by the Law of Ukraine On Prevention of Corruption.

2. The Authorized Person may be dismissed from position early in cases stipulated by the Law of Ukraine On Prevention of Corruption.

The Authorized Person may be dismissed from position at the initiative of the head of the Company, subject to the consent of the National Agency for the prevention of corruption in accordance with the established procedure.

3. The Authorized Person may involve employees of the Company in the performance of his/her functions by providing them with oral and written instructions and monitoring their implementation.

2. Obligations and rights of the Authorized Person

1. The Authorized Person is obliged to:

- 1) perform his/her duties impartially;
- 2) organize the preparation, development and submit for approval to the head (supervisory board) internal documents of the Company on the formation and implementation of this Program;
- 3) organize periodic assessment of corruption risks in the Company's activities;
- 4) familiarize new employees with the content of the Anti-Corruption Program, perform the obligation to comply with the requirements of the Anti-Corruption Program in a certain form (Annex 1 to this Anti-Corruption Program), conduct training events on preventing and combating corruption;
- 5) ensure interaction and coordination between the Company's structural units regarding the preparation, implementation and control of the implementation of activities provided for in this Program;
- 6) provide the head, members of the management body, officials, employees of Polygraph Combine "Ukraine" with explanations and individual consultations related to the implementation of this Program and compliance with the requirements of anti-corruption legislation;
- 7) provide employees of the Company or persons who are trained at the Company or perform certain work on the basis of civil law contracts concluded with the Company, methodological assistance and advice on reporting possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine On Prevention of Corruption and protecting whistleblowers, conduct training on these issues;
- 8) ensure that the public is informed about the measures taken by Polygraph Combine "Ukraine" to prevent corruption;
- 9) organize events to improve the skills of employees of the Company on preventing and combating corruption;
- 10) regularly, at least once every 2 years, improve his/her skills, initiate questions to the head of Polygraph Combine "Ukraine" regarding the completion of his/her professional training (advanced training);
- 11) take measures to detect conflicts of interest and facilitate its resolution, inform the head of the Company on the detection of conflicts of interest and measures taken to resolve them;
- 12) organize and conduct inspections of the Company's business partners;
- 13) participate in the Company's personnel selection procedures, in particular by initiating, organizing, and conducting inspections of candidates for positions;
- 14) check for corruption risks and coordinate (approve) drafts of organizational and administrative documents, transactions of the Company;
- 15) organize the work of internal channels for reporting possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine On Prevention of Corruption;

16) receive and organize consideration and check of the reports on possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine On Prevention of Corruption;

17) participate in internal investigations conducted under this Program;

18) inform the head of the Company on the facts that may indicate the commission of corruption or corruption-related offenses and other violations of the requirements of the Law of Ukraine On Prevention of Corruption by officials, employees, representatives of the Company;

19) in case of detection of a corruption or corruption-related offense or receipt of a message about the commission of such an offense by officials, employees of the Company, take measures to stop such the offense and immediately, within 24 hours, notify in writing about its commission to the specially authorized entity in the field of combating corruption;

20) organize work and participate in an internal investigation conducted to identify the causes and conditions that led to the commission of a corruption or corruption-related offense or non-compliance with requirements of the Law of Ukraine On Prevention of Corruption in any other way, on the recommendation of a specially authorized entity in the field of combating corruption or by order of the National Agency for the prevention of corruption;

21) cooperate with whistleblowers, ensure compliance with their rights and protection guarantees provided for in the legislation of the Law of Ukraine On Prevention of Corruption;

22) inform whistleblowers about their rights and obligations under the Law of Ukraine On Prevention of Corruption, as well as about the status and results of consideration, verification and/or investigation of the information provided by them;

23) inform the National Agency for the prevention of corruption if the HR Department of the Company does not send a certified paper copy of the administrative document on the imposition of a disciplinary penalty and an information card to the administrative document on the imposition (cancellation of the administrative document on the imposition) of a disciplinary penalty on a person for committing corruption or corruption-related offenses in order to enter information in the Unified State Register of persons who have committed corruption or corruption-related offenses;

24) conduct verification of the fact of submission of tax returns by the subjects of declaring and notify the National Agency for the prevention of corruption of cases of non-submission or late submission of such returns in accordance with the procedure established by the legislation*;

25) ensure the formation and maintenance of registers:

of employees of Polygraph Combine “Ukraina” who were brought to responsibility for violating the requirements of this Program, committing a corruption or corruption-related offense, or other violations of the Law of Ukraine On Prevention of Corruption;

of verifications of business partners and candidates for the position conducted in accordance with this Program;

of internal investigations conducted under this Program;

of reports of a conflict of interest, commission of a corruption or corruption-related offense, or other violation of the Law of Ukraine On Prevention of Corruption, violation of the requirements of this Program;

of business hospitality and gifts;

26) ensure supervision, control and monitoring of compliance with this Program and anti-corruption legislation;

27) evaluate the results of the implementation of the activities provided for in this Program;

28) ensure the preparation of a report on the status of implementation of this Program;

29) participate in cooperation with state authorities, local governments, other legal entities, non-governmental and/or international organizations on corruption prevention issues;

30) perform other contractual duties stipulated by the Law of Ukraine On Prevention of Corruption, this Program, internal documents of the Company adopted for the implementation of the Law of Ukraine On Prevention of Corruption and this Program, in particular those aimed at reviewing reports of whistleblowers and ensuring compliance with their rights and guarantees of protection.

2. The Authorized Person has the right to:

1) receive oral and written explanations from officials, employees and representatives of Polygraph Combine “Ukraina” regarding circumstances that may indicate a violation of the requirements of the Law of Ukraine On Prevention of Corruption and this Program for the prevention and resolution of conflicts of interest and other stipulated requirements, restrictions and prohibitions, as well as on other issues related to the implementation of this Program;

2) call and interview persons whose actions or omissions relate to the facts reported by a whistleblower, including officials of the Company;

3) get access, subject to restrictions established by law, to documents and information kept by the Company, which are necessary for the performance of the duties assigned to him/her, make or receive copies of these documents;

4) request from other structural units of Polygraph Combine “Ukraina” information, documents or copies thereof, including those containing information with restricted access (except for state secrets), which are necessary to perform the duties assigned to him/her;

5) process information, including personal data, in compliance with the legislation on access to personal data;

6) get access to the warehouse, production and other premises of the Company if it is necessary to carry out anti-corruption measures;

7) get access to the electronic means of storing and processing data available at the Company, which are necessary for the performance of the duties assigned to him/her, and, if necessary, require the registration of relevant data on paper;

8) sign and send information requests to a state authority, local government, enterprises, institutions, organizations of all forms of ownership, in order to receive information and materials directly related to the performance of the duties of the Authorized Person;

9) sign and send letters to the National Agency for the prevention of corruption or other specially authorized entities in the field of combating corruption with reports of corruption or corruption-related offenses or other violations of the Law of Ukraine On Prevention of Corruption;

10) apply to the National Agency for the prevention of corruption regarding the violated rights of a whistleblower and his/her close persons;

11) perform other powers defined by the Law of Ukraine On Prevention of Corruption aimed at comprehensive consideration of reports of corruption or corruption-related offenses and other violations of requirements of the Law of Ukraine On Prevention of Corruption, including reports of whistleblowers, protection of their rights and freedoms;

12) initiate inspections on the grounds provided for by the Law of Ukraine On Prevention of Corruption and this Program;

13) initiate internal investigations in relation to possible violation of the Law of Ukraine On Prevention of Corruption and this Program;

14) submit to the head of the Company a request for bringing to disciplinary responsibility persons guilty of violation of the Law of Ukraine On Prevention of Corruption or this Program;

15) participate in meetings of working groups and commissions of the Company on issues falling within the competence of the Authorized Person;

16) initiate meetings on the prevention and detection of corruption, implementation of this Program;

17) involve employees of Polygraph Combine "Ukraina" in the performance of his/her powers with the consent of the head of the Company;

18) submit proposals for improving the work of the Authorized Person for consideration by the head/supervisory board of the Company;

19) contact the head, members of the management body of the Company on the implementation of his/her powers and performance of official duties;

20) other rights provided for by the Law of Ukraine On Prevention of Corruption, this Program, the employment contract, the job description of the Authorized Person, and other internal documents of the Company.

3. Guarantees of independence

1. The Authorized Person's performance of his/her functions at the Company shall be independent. Interference in the activities of the Authorized Person by the head of the Company, the management body and members of the management body, officials, employees, representatives, business partners of the Company, as well as other persons is not allowed.

2. Interference should be understood as:

1) refusal to provide the Authorized Person with information, documents, access to information and documents that the Authorized Person has the right to receive;

2) any influence on the decision-making and performance of actions by the Authorized Person, which is carried out outside the powers of the management body/person exerting influence, provided for by the legislation, the Charter of the Company, decisions of the management body or internal documents of the Company;

3) actions/omissions that cause restriction or violation of the rights of the Authorized Person;

4) actions/omissions that hinder the performance of official duties by the Authorized Person;

5) assigning duties to the Authorized Person, providing instructions on issues that do not belong to or go beyond the limits of his/her powers defined by the Law of Ukraine On Prevention of Corruption and this Program, and restrict the performance of his/her official duties.

3. The Authorized Person may not be dismissed or forced to dismiss, brought to disciplinary responsibility or subjected by the head, members of the management body of the Company to other negative measures of influence (transfer, certification, change of working conditions, refusal to appoint to a higher position, reduction of wages, refusal to extend the employment contract, etc.) or the threat of such measures of influence in relation to the implementation of anti-corruption measures, detection and reporting of possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine On Prevention of Corruption.

Negative measures of influence also include formally lawful decisions and actions of the head, members of the management body of the Company, which are selective in nature, in particular, do not apply to other employees, managers in similar situations and/or have not been applied to the Authorized Person in similar situations (under similar circumstances) before.

4. Application of disciplinary penalties to the Authorized Person shall be carried out with the prior consent of the supervisory board or the body to the field of management of that the Company belongs.

5. Removal by the head of the Company of the Authorized Person from performing official duties shall be carried out with the prior consent of the supervisory board or the authorized management body.

6. In case of violation of the guarantees of independence, the Authorized Person shall notify the Supervisory Board of the Company or the Authorized management body and, if necessary, the National Agency for the prevention of corruption.

7. The head of the Company, members of the management bodies of the Company, officials of Polygraph Combine “Ukraina” are obliged to:

1) ensure the independence of the Authorized Person;

2) provide the Authorized Person with proper material and organizational working conditions (a separate office, a safe for storing documents, a workplace equipped with office furniture, computer equipment and organizational equipment, access to the Internet, office supplies, communication facilities, an electronic mailbox account) and sufficient resources to perform the tasks assigned to him/her;

3) facilitate the performance by the Authorized Person of the tasks provided for by the Law of Ukraine On Prevention of Corruption and this Program; at the request of the Authorized Person, provide information and documents necessary for the performance of the duties assigned to him/her, facilitate internal investigations, ensure the involvement of employees/resources for the performance of the Authorized Person;

4) respond within a reasonable time to written and oral requests, proposals and recommendations of the Authorized Person provided to them as part of the implementation of this Program.

IV. Managing corruption risks

1. In order to effectively prevent corruption in its activities, the Company applies a risk-based approach and creates a risk management system that provides for regular assessment of corruption risks that may

influence the activities of the Company, taking measures necessary and sufficient to eliminate or minimize them, their further monitoring and control, as well as updating existing anti-corruption measures in accordance with changes in the internal and external environment of Polygraph Combine “Ukraine”.

2. The Company shall carry out a periodic assessment of corruption risks in its activities, the purpose of that is:

1) detection of internal and external corruption risks in the activities of Polygraph Combine “Ukraine”;

2) assessment of the sufficiency, relevance and effectiveness of existing measures to properly prevent, eliminate or minimize detected corruption risks;

3) analysis and assessment (determination of levels) of detected corruption risks;

4) determining the priority of high-risk processes of activities of Polygraph Combine “Ukraine”, taking into account the nature and degree of vulnerability of these processes to corruption risks, the levels of assessed corruption risks;

5) development of measures to effectively eliminate or minimize corruption risks in the Company's activities.

3. The organization of periodic assessment of corruption risks in the activities of Polygraph Combine “Ukraine” shall be carried out by the Authorized Person.

4. The Company may carry out internal and/or external assessment of corruption risks.

Internal assessment of corruption risks shall be carried out by a working group formed from representatives of the Company's structural units.

External assessment of corruption risks shall be carried out by audit, legal, consulting companies or independent experts involved by the Company.

5. The Company shall assess corruption risks in its activities at least once every 3 years.

6. Polygraph Combine “Ukraine” may decide to carry out an assessment of corruption risks according to the procedure defined by law.

7. Based on the results of assessing corruption risks in the Company's activities, a risk register shall be formed.

8. The risk register must contain:

1) detected corruption risks, areas of activity of the Company that they are detected in, their descriptions, sources, existing control measures, assessment of their sufficiency, compliance and effectiveness;

2) levels of detected corruption risks;

3) proposals for measures to eliminate or minimize detected corruption risks.

9. The risk register after its registration based on the results of the corruption risk assessment shall be submitted for approval to the head of the Company.

10. The head of the Company shall approve the risk register and ensure that the measures provided for by it are taken, including by updating existing anti-corruption measures, and allocate the necessary resources for this.

11. At the request of the supervisory board/ authorized management body of the Company, the risk register shall be brought to their attention.

12. The risk register shall be provided for execution to the responsible units/performers, and may also be posted on the Company's website for review by all concerned persons.

13. The Authorized Person shall monitor the implementation of measures to eliminate or minimize detected corruption risks, prepare and submit reports on the status of implementation of measures in accordance with the procedure and deadlines specified in this Program.

V. Educational activities

1. Periodic training on corruption prevention and detection

1. In order to form an appropriate level of anti-corruption culture, the Authorized Person shall ensure the organization of mandatory familiarization with the provisions of the Law of Ukraine On Prevention of Corruption, this Program and the internal documents of the Company adopted for its implementation of newly appointed employees, representatives of the Company and persons who are trained at Polygraph Combine “Ukraina” or perform certain work.

2. The Company shall ensure proper and sufficient communication of the provisions of this Program and internal documents of the Company in the field of preventing and combating corruption, changes in anti-corruption legislation and the practice of its application to all employees, representatives and business partners of Polygraph Combine “Ukraina” by informing (communications).

3. The Authorized Person is responsible for informing on the prevention and detection of corruption.

4. The Company shall provide periodic professional development (training) of the head, members of the management body, officials, employees and the Authorized Person.

5. The head of the Company and the Authorized Person shall pass advanced training in the prevention and detection of corruption at least once every 3 years.

6. Planned training of the Company officials shall be carried out in accordance with:

- the thematic schedule approved by the head of the Company for each year, which is prepared by the Authorized Person;

7. Anti-corruption training programs (basic and in-depth ones) shall be implemented both remotely and in person.

8. The subject and form of training events (seminars, lectures, workshops, trainings, individual classes, webinars, etc.) shall be determined taking into account:

1) amendments to legislation;

2) proposals of the head, members of the management body, officials, employees of the Company;

3) results of monitoring/assessing the implementation of this Program;

4) results of periodic assessment of corruption risks in the Company's activities;

5) results of conducted checks and internal investigations;

6) results of checks of compliance with anti-corruption legislation conducted by the National Agency for the prevention of corruption.

9. In case of detection of the facts of committing corruption offenses in the activities of the Company, the Authorized Person shall form a list of employees who participate in the implementation of high-risk business processes and must pass mandatory extraordinary training, as well as forms and implements the appropriate training Program.

10. Training is completed by testing the persons who took part in it for the level of assimilation of educational information or by another method of initial knowledge control.

11. The Authorized Person shall keep records of professional development measures in the field of preventing and detecting corruption, record those present at such events and evaluate their effectiveness.

2. Providing employees with explanations and advice by the Authorized Person

1. If there are questions regarding the explanation of certain provisions of this Program, the head, members of the management body, officials, employees and representatives of the Company may apply to the Authorized Person for an oral or written explanation or advice.

2. The Authorized Person shall provide explanations or advice within a reasonable time, but not more than 10 days from the date of receipt of the request. If it is not possible to provide an explanation or advice within the specified period, the Authorized Person may extend the term of consideration of the request, that should be notified to the person who applied for the explanation or advice. The total term of consideration of the request may not exceed 30 days from the date of its receipt by the Authorized Person.

3. The Authorized Person shall summarize the most common questions that are addressed to him/her, answer to them and place generalized explanations (consultations, etc.) of an informational nature on resources that are publicly available to employees of the Company and/or distribute them in other ways (for example, by e-mail).

4. The Authorized Person may also choose other forms of providing explanations and advice on the implementation of this Program and anti-corruption legislation (memos, video messages, etc.).

VI. Prevention and verification measures

1. Conflict of interests prevention and resolution

1. The Company strives to ensure that conflicts of interest do not adversely affect its interests, as well as the interests of its clients/customers, by preventing, identifying and resolving conflicts of interest.

2. Polygraph Combine “Ukraina” shall provide prevention and resolution of conflict of interest situations on the basis of the following principles:

1) mandatory informing employees about situations that show signs of a conflict of interest;

2) preventing conflicts of interest;

3) individual approach when considering and assessing each individual case that has signs of a conflict of interest.

3. Employees of the Company are obliged not later than the next business day from the day when they became aware or should have become aware of the existence of a real or potential conflict of interest, to notify their immediate manager and the Authorized Person in writing, not to perform actions or make decisions in conditions of a real conflict of interest, and to take measures to resolve a real or potential conflict of interest.

4. In the event of a real or potential conflict of interest for the head of the Company, he/she shall notify in writing the Authorized Person and the person or body whose powers include the dismissal/initiation of dismissal from the position of the head of the Company.

5. In case of a real or potential conflict of interest for a representative of Polygraph Combine "Ukraina", he/she shall notify the Authorized Person in writing.

6. In case of a real or potential conflict of interest for the Authorized Person, he/she shall notify in writing the head of the Company/ the Supervisory Board of the Company,

7. The direct manager of the person within two business days after receiving the notification about the presence of a real or potential conflict of interest in a subordinate person, shall make a decision on the method of resolving the conflict of interest, taking into account the recommendations of the Authorized Person, and notify the employee thereof.

8. The immediate manager, who has become aware of the conflict of interests of a subordinate employee (including in the case of self-identification of a conflict of interests existing in a subordinate person, without making a corresponding notification), is obliged to inform the Authorized Person and take the measures provided for in this Program to prevent and resolve the conflict of interests.

9. The conflict of interest shall be resolved through one of the following measures (separately or in combination):

1) removing an employee from performing a task, performing actions, making a decision, or participating in its adoption in a real or potential conflict of interest;

2) application of external control over the performance of the relevant task by the person, the performance of certain actions or decision-making;

3) restricting the employee's access to certain information;

4) revision of the scope of official (functional) responsibilities of the employee;

5) transfer of the employee to another position;

6) dismissal of the employee.

10. The procedure for applying measures to resolve conflicts of interest and its specifics for different categories of persons shall be established by the Authorized Person, taking into account the following requirements:

1) transfer of an employee to another position shall be applied only with his/her consent if the real or potential conflict of interest in the employee's activities is permanent and cannot be resolved in any other way and if there is a vacant position that corresponds in its characteristics to the personal and professional qualities of the employee;

2) dismissal of an employee from his/her current position due to the existence of a conflict of interest shall be carried out if the real or potential conflict of interest in his/her

activity is permanent in nature and cannot be regulated in any other way, including due to the lack of consent of the employee to transfer or to deprivation of private interest;

3) in the event of a potential or real conflict of interest for a representative, the Company shall terminate legal relations with him/her. If the conflict of interests of the representative of the Company is permanent, the representative of the Company is subject to inclusion in the list of persons whose services are not subject to use and/or in whose favor payments are not made.

11. The decision to resolve the conflict of interest in the activities of the head of the Company shall be made by the person or body whose powers include dismissal/initiation of dismissal from the position of the head of the Company, within two business days after receiving the notification. The person concerned and the Authorized Person shall be immediately notified of the decision.

12. Employees of Polygraph Combine "Ukraine" may independently take measures to resolve conflicts of interest by depriving the relevant private interest with the provision of supporting documents to the direct manager and Authorized Person.

13. The head of the Company may independently take measures to resolve the conflict of interest by depriving the relevant private interest with the provision of supporting documents to the Authorized Person, as well as to the person or body whose powers include dismissal/initiation of dismissal from the position of the head of the Company.

14. In the event of a real or potential conflict of interest for a person who is a member of a collegial body (management body of the Company (supervisory board), commission, working group, tender committee, etc.), when resolving the issue by this body, such person shall notify the relevant collegial body and the Authorized Person in writing.

15. The above person is prohibited to:

1) participate in the preparation of documents for decision-making by a collegial body on the relevant issue;

2) participate in the consideration (discussion) of the relevant issue;

3) vote on the relevant issue.

16. Typical situations of conflict of interest may be:

1) participation in making a decision on entering into an employment contract, promotion at work, determining the terms of remuneration and applying measures of material incentives, imposing penalties against one's closed person;

2) conclusion of transactions with close persons on behalf of the Company;

3) participation of a person subject to the requirements of this Program in making a decision that may affect the receipt of benefits by another business entity, over the activities of which such person or his/her close person exercises actual control, in which such person, his/her close person as an employee, receives or has received remuneration or gifts, has been or is undergoing training;

4) registration by a person subject to the requirements of this Program, an individual entrepreneur, or the formation by such a person of a legal entity that provides services/performs works identical to those provided/performed by the Company;

5) acceptance or participation in making by a person subject to the requirements of this Program, decisions regarding himself/herself, in particular regarding remuneration, providing any benefits of a material or non-material nature, conducting an internal/official investigation.

2. Interaction with business partners

1. The Company strives to cooperate with business partners that carry out their activities legally and ethically, interaction with those does not carry corruption risks for Polygraph Combine “Ukraina”.

2. Polygraph Combine “Ukraina” shall inform business partners before establishing business relations with them about the principles and requirements of the Company in the field of preventing and combating corruption, which are provided for by this Program, other policies developed for its implementation, including the procedure for checking business partners.

3. The Company shall check potential business partners (before the date of conclusion of transactions) and existing business partners (after establishing legal relations with them).

4. Checking potential or existing business partners of the Company shall be carried out by the Authorized Person. Other structural units of Polygraph Combine “Ukraina” may also be involved in the check.

5. The criteria, grounds, procedure and frequency of checking the business partners of the Company shall be defined in the internal documents of Polygraph Combine “Ukraina”, that shall be developed by the Authorized Person and approved by the head of the Company.

6. Checking procedures, frequency of checks and criteria for selecting business partners shall be determined depending on the scope and place of activity, the structure of the Company, the nature and level of corruption risks that may arise in relations with a business partner.

7. Checking of business partners of the Company shall be carried out in order to:

1) check the business reputation of a business partner for tolerance to corruption, namely: whether a business partner has the reputation of an entity the activities of that are related to corruption (even in the absence of relevant court decisions), and will the business partner act as an intermediary to transfer illegal benefits to third parties (or to obtain from third parties);

2) check whether a business partner has an anti-corruption program (or other anti-corruption policies), the state of its (their) actual implementation, readiness (or refusal) to comply with the principles and requirements of the Company, as well as anti-corruption legislation;

3) detection of possible corruption risks in connection with the conclusion (execution) of a transaction;

4) minimization of the probability of committing or verifying possible facts of committing a corruption or corruption-related offense, other violation of anti-corruption legislation in the establishment and/or implementation of legal relations with the business partner.

8. If there are reasonable doubts about the business reputation of the business partner, which may lead to corruption risks for the Company, Polygraph Combine “Ukraina” shall reserve the right to refuse the business partner to establish/continue business relations, taking into account the requirements of the legislation, in particular, the Law of Ukraine On Public Procurement.

9. Materials of checks of the business partners shall be stored for at least 5 years.

10. The agreements (contracts) that Polygraph Combine “Ukraine” concludes with business partners may include anti-corruption clauses. The purpose of the anti-corruption clause is to provide the Company with guarantees of compliance with the anti-corruption legislation that applies to it, and to obtain similar guarantees from the business partner.

Versions of anti-corruption clauses shall be developed by the Authorized Person, taking into account the areas of activity of the Company.

3. Business hospitality policies and procedures. Gifts

1. Polygraph Combine “Ukraine”, taking into account the requirements of the legislation, shall determine the general policy and procedures for providing and receiving business hospitality and gifts.

2. The head, members of the management body, officials, employees, representatives of the Company are obliged to refrain from offering business hospitality, gifts to officials, their close persons, actual or potential business partners, their employees or representatives, if such business hospitality or gifts may be regarded as an incentive or readiness to commit a corruption offense related to the activities of the Company.

3. Giving and receiving gifts, as well as providing and receiving business hospitality within the framework of establishing or maintaining a business relationships or to achieve another purpose of the Company's activity, is allowed if it meets a set of such criteria:

1) it is not intended to influence the objectivity of any decision regarding the conclusion of transactions, provision or receipt of services, information, or any other benefits for the Company;

2) it is not a hidden undue benefit (for example, to receive or continue to receive commercial orders or an improper advantage);

3) it corresponds to generally accepted ideas on hospitality (for example, a gift is a souvenir product);

4) it is not prohibited by the law of the state in which they are provided and/or accepted;

5) the cost does not exceed the limits established by law;

6) it is not prohibited in accordance with the internal documents of the recipient's organization and does not exceed the cost established by such documents;

7) disclosure of a gift, business hospitality will not create a risk to the business reputation of the Company or the person who received the gift or business hospitality;

8) gifts, business hospitality are reasonable, not excessive and appropriate in the context of establishing/maintaining business relationships.

4. It is not allowed to give or receive gifts in the form of money funds (cash or non-cash), cash equivalent (gift cards or gift vouchers).

5. If there are doubts about the acceptability of a gift or business hospitality, employees should contact the Authorized Person in accordance with the procedure specified in this Program for advice and/or explanation.

6. The head, members of the management body, officials, employees, representatives of Polygraph Combine “Ukraine” within one business day shall inform the Authorized Person in accordance with the procedure established by the Company, about the facts of providing (giving) or receiving a gift/business hospitality within the framework of generally recognized ideas on hospitality.

4. Verification of candidates for positions

1. In order to implement this Program, the Company shall verify candidates for positions that are vulnerable to corruption risks as part of recruitment procedures.

2. Verification of candidates for positions shall be carried out in order to:

1) define whether the conclusion of an employment contract with a candidate causes corruption risks for the Company;

2) define whether the conclusion of an employment contract with a candidate will lead to a violation of anti-corruption legislation;

3) make sure that the candidate undertakes to comply with the requirements of this Program.

3. The decision to conclude an employment contract shall be made taking into account the requirements of anti-corruption legislation.

4. Verification of candidates for positions that are vulnerable to corruption risks shall be carried out by the Authorized Person. Based on the results of the verification, the Authorized Person shall prepare a reasonable conclusion for the head of the Company on the presence or absence of corruption risks.

5. The procedure for verifying candidates for positions and the list of positions that are vulnerable to corruption risks shall be determined by the Company.

6. Materials of verification of candidates for positions that are vulnerable to corruption risks shall be stored in personal files for the entire period of their storage.

VII. Notifications, their verification and responsibility

1. Reporting on possible facts of corruption or corruption-related offenses or other violations of the Law of Ukraine On Prevention of Corruption

1. Polygraph Combine “Ukraine” shall create favorable conditions for whistleblowers and form respect for whistleblowers as part of the business culture of the Company.

2. The Company shall provide whistleblowers with conditions for reporting possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine On Prevention of Corruption (hereinafter referred to as the Notification) by:

1) mandatory creation and maintenance of channels through which a person can make a Notification, guaranteed to maintain their anonymity (hereinafter referred to as Notification Channels);

2) definition of internal procedures and mechanisms for receiving and reviewing Notifications, verifying and properly responding to them in accordance with the Law of Ukraine On Prevention of Corruption;

3) providing methodological assistance and advice on making Notifications to potential whistleblowers;

4) implementation of mechanisms for promoting and building a culture of Notification;

- 5) compliance with the rights and guarantees of protection of whistleblowers.
3. The whistleblowers shall independently determine which Notification Channels to use to make the Notification.
4. The whistleblowers shall be guaranteed confidentiality IN accordance with the procedure and conditions defined by the Law of Ukraine On Prevention of Corruption.
5. A person may make a Notification without specifying authorship (anonymously).
6. Information about Notification Channels shall be brought to the attention of all employees, including when applying for a job, posted on the Company's information stands and on the website of Polygraph Combine "Ukraina".
7. The Company shall encourage business partners to report through Notification Channels any known facts of committing corruption or corruption-related offenses or other violations of the Law of Ukraine On Prevention of Corruption by the head, officials, employees.
8. The Notification must contain factual data confirming the possible commission of a corruption or corruption-related offense or other violation of the Law of Ukraine On Prevention of Corruption, that can be verified.
9. An anonymous Notification is subject to review if the information provided in it concerns a specific person, contains factual data that can be verified.
10. Means of encouraging Notification shall be implemented by Polygraph Combine "Ukraina" through:
 - 1) approval of internal documents of the Company that determine the forms of incentives, organizational bases for the functioning of the incentive mechanism;
 - 2) providing methodological assistance and advice on making Notifications;
 - 3) moral and material encouragement of whistleblowers.
11. Means of forming the culture of Notification shall be implemented by the Company through:
 - 1) approval of internal documents of Polygraph Combine "Ukraina" regarding ethical behavior at the Company, in particular, the formation of respect for whistleblowers as responsible citizens,
 - 2) conducting internal trainings on the formation of the culture of Notification;
 - 3) systematic implementation of educational and communication activities.

2. Rights and guarantees of whistleblower protection

1. Whistleblowing is an honorary right of every employee of the Company.
2. The whistleblower shall have the rights and guarantees of protection provided for in articles 53³-53⁸ of the Law of Ukraine On Prevention of Corruption, in particular:
 - 1) submit evidence to support his/her Notification;
 - 2) receive confirmation of acceptance and registration of the Notification;
 - 3) for confidentiality;
 - 4) receive information on the status and results of reviewing, verifying and/or investigating information on the fact of the information provided by him/her;

5) for exemption from legal responsibility for the implementation of Notification, dissemination of information specified in the Notification, despite the possible violation by such Notification of his/her labor, civil or other duties or obligations;

6) for exemption from civil liability for property and/or moral damage caused as a result of the Notification, except in the case of a deliberately false notification.

3. The rights of the whistleblower arise from the moment of making the Notification containing factual data confirming the possible commission of a corruption or corruption-related offense or other violation of the Law of Ukraine On Prevention of Corruption that can be verified.

4. The whistleblower shall be provided with guarantees for the protection of his/her rights in accordance with the procedure and conditions established in the Law of Ukraine On Prevention of Corruption.

5. It is prohibited to disclose information about the identity of the whistleblower, his/her close persons or other data that may identify the identity of the whistleblower, his/her close persons, third parties who are not involved in the consideration, verification and/or investigation of the facts reported by him/her, as well as persons whose actions or omissions relate to the facts reported by him/her, except in cases established by law.

6. Only the head of the Company, the Authorized Person and the employees who are involved in the process of accepting and reviewing Notifications at the Company shall have access to information about whistleblowers.

7. In the event of a leak of confidential information about a whistleblower, the Authorized Person, the head of the Company, at the request of such a person or on his/her own initiative, must immediately take all measures to avoid the occurrence of negative consequences for the whistleblower connected with such disclosure.

8. It is prohibited to intimidate, humiliate or harass whistleblowers, apply other negative measures of influence to them (refusal of employment; dismissal or forcing to dismiss; bringing to disciplinary responsibility; other measures, including formally lawful decisions and actions that are selective in nature, in particular, do not apply to other employees in similar situations and/or have not been applied to the employee in similar situations before) or threats to apply such measures of influence.

9. The whistleblower may not be dismissed or forced to dismiss, brought to disciplinary responsibility, subjected to other negative measures of influence or threatened with such measures of influence in connection with the Notification.

10. The head, members of the management body, officials of all other levels, and the Authorized Person, within the limits of their powers, provide conditions for the protection of whistleblowers.

11. The rights and guarantees of protection of whistleblowers shall apply to close persons of the whistleblower.

3. Notification of possible violations of this Program

1. Employees and persons who study at the Company or perform certain work, representatives, as well as business partners of Polygraph Combine “Ukraina” may report any signs of violations of this Program, facts of incitement of employees, manager, officials, members of the management body to commit corruption or corruption-related violations, other violations of the Law of Ukraine On Prevention of Corruption directly to the head of the Company, the Authorized Person or by sending an electronic message to the Company's email address general@pk-ukraina.gov.ua.

2. The procedure for reviewing such messages, interacting with the applicant, guaranteeing the confidentiality of information about the applicant and protecting his/her rights shall be defined by the internal document of the Company.

4. Conducting internal investigations

1. In case of receipt of a Notification or detection of signs of committing a corruption or corruption-related offense or other violation by an official or employee of the Company of the Law of Ukraine On Prevention of Corruption or this Program, the Authorized Person shall perform preliminary verification of the information received (detected) in accordance with the requirements of the Law of Ukraine On Prevention of Corruption and internal documents of the Company.

2. If information received (detected) about the commission of a corruption or corruption-related offense or other violation of the Law of Ukraine On Prevention of Corruption refers to the actions or omissions of the head of the Company, such information without conducting a preliminary check shall be sent by the Authorized Person within three days to the subject authorized to carry out its consideration or investigation, taking into account the jurisdiction determined by Article 216 of the Criminal Procedure Code of Ukraine, and the provisions provided for by Article 255 of the Code of Ukraine on Administrative Offenses, and shall send a copy of the relevant letter to the National Agency for the prevention of corruption, if it is not an entity authorized to review the information.

The received (detected) information shall also be sent to the subject whose powers include the appointment (election) and dismissal of the head of the Company.

3. In case of receipt of a Notification or detection of signs of commission by the Authorized Person of a corruption or corruption-related offense, other violation of the Law of Ukraine On Prevention of Corruption or this Program, preliminary check of such information shall be carried out in accordance with the internal documents of the Company.

4. Based on the results of the preliminary check, the following decision shall be made:

1) take measures to stop the detected violation;

2) appoint an internal investigation in case of confirmation of the facts stated in the Notification (detected) or the need for further clarification of their reliability;

3) in case of detection of signs of a corruption or corruption-related offense, immediately, within 24 hours, notify the specially authorized entity in the field combating corruption, in writing;

4) close the proceedings in case of non-confirmation of the facts stated in the Notification (detected).

5. The purpose of an internal investigation is to check factual data on the possible commission of a corruption or corruption-related offense or other violation of the Law of Ukraine On Prevention of Corruption or this Program.

6. An internal investigation shall be conducted by a Commission.

7. The Commission should mandatorily include the Authorized Person, except in cases when the investigation is appointed based on the results of detecting facts or receiving information about the commission of a corruption or corruption-related offense or other violation by the Authorized Person or other violation of the Law of Ukraine On Prevention of Corruption or this Program.

8. All officials and employees of the Company, regardless of their position, are required to assist in conducting an internal investigation, as well as provide the necessary available documents and materials.

9. An official or employee of the Company against whom an internal investigation is being conducted may be temporarily suspended from work (if there are grounds provided for by law) or otherwise restricted in access to material, information and other resources of the Company for the duration of the internal investigation on the basis of a decision of the head of the Company or, if the investigation concerns the head of the Company, on the basis of a decision of the supervisory board/Authorized management body.

10. Based on the results of the internal investigation, the following decision(s) shall be made:

- 1) take measures to stop the detected violation;
- 2) apply a disciplinary penalty to the perpetrators;
- 3) determine ways to eliminate the causes and conditions for committing the violation, the consequences caused by it, and take measures to prevent such violations in the future;
- 4) implement measures to restore the rights and legitimate interests of individuals and compensate for losses and damage caused to individuals and legal entities as a result of violations committed;
- 5) transfer the materials to the pre-trial investigation body in case of establishing signs of a criminal offense or to other bodies authorized to respond to identified offenses.

11. The period for conducting the internal investigation should not exceed 30 (thirty) calendar days from the date of completion of the preliminary check. If it is impossible to verify the reported (detected) information within the specified period, the head of the Company shall extend the internal investigation period to 60 days.

12. The procedure for conducting internal investigations shall be determined by the Company.

13. The Authorized Person shall have access to the materials of internal investigations, which are stored for at least 5 years.

5. Disciplinary responsibility for violation of this Program

1. For violation of the provisions of this Program, employees of the Company are subject to disciplinary measures in accordance with the legislation, internal labor regulations of the Company, and the provisions of employment contracts.

2. The HR Department of the Company shall send to the National Agency for the prevention of corruption a certified paper copy of the decision (order) of the head of the Company on the imposition of a disciplinary penalty and an information card to the administrative document on the imposition (cancellation of the administrative document on the imposition) of a disciplinary penalty on a person for committing corruption or corruption-related offenses in order to enter information about the imposition of a disciplinary penalty for committing a corruption or corruption-related offense in the Unified State Register of persons who have committed corruption or corruption-related offenses.

3. The head of the Company shall ensure that measures are taken for committing a corruption or corruption-related offense.

VIII. Supervision, control, and modification of this Program

1. Supervision and control

1. The Authorized Person shall supervise and constantly monitor compliance with this Program by the head, members of the management body, officials, employees and representatives of the Company.

2. The Authorized Person shall supervise and monitor compliance with this Program by:

1) reviewing and response to the Notifications;

2) carrying out checks of the activities of employees of Polygraph Combine “Ukraine” on the execution (implementation) of this Program;

3) carrying out checks of organizational and administrative documents, transactions, and other documents of the Company provided for in this Program, as well as their drafts, for corruption risks;

4) implementation of periodic monitoring of the implementation of this Program.

The Company may determine the procedure for carrying out scheduled and unscheduled checks of the activities of employees of Polygraph Combine “Ukraine”, the procedure for conducting document check, as well as additional forms of supervision and control over compliance with this Program, taking into account the specifics of its activities.

3. If, during the supervision or control of compliance with this Program, the Authorized Person finds signs of committing a corruption or corruption-related offense, he/she shall initiate an internal investigation before the head of the Company in accordance with the procedure provided for in this Program and internal documents of the Company.

4. The Authorized Person shall prepare a report on the results of monitoring the implementation of this Program at least once every 6 months within the time limits and in accordance with the procedure determined by the head of the Company (hereinafter referred to as the Report). Such the Report shall be equated with an annual assessment of the results of implementing the activities provided for in this Program.

5. The Report should include information on:

1) status of implementation of activities defined by this Program;

2) results of implementation of the measures defined by this Program;

3) detected violations of the requirements of the Law of Ukraine On Prevention of Corruption, this Program, measures taken to eliminate such violations and prevent their commission in the future;

4) the number of conducted checks, internal investigations, and their results;

5) facts of violation of the guarantees of independence of the Authorized Person;

6) implementation of measures aimed at eliminating or minimizing corruption risks;

7) conducted trainings on the prevention and detection of corruption and the state of mastering the acquired knowledge;

8) cooperation with whistleblowers;

9) newly detected corruption risks;

10) proposals and recommendations.

6. The Report may contain other information related to the implementation of this Program.

7. The summarized results of monitoring the implementation of this Program shall be posted in the public domain for employees of the Company, as well as on the official website of Polygraph Combine “Ukraine”.

8. The Authorized Person shall ensure at least once a year that the assessment of the results of the implementation of the activities provided for in this Programme is organized.

9. The results of the assessment shall be summarized by the Authorized Person in a written report, that he/she shall submit to the manager and the supervisory board.

10. Assessment of the results of the implementation of the measures provided for in this Program shall be carried out according to the criteria determined by the Authorized Person, and must contain information in the amount not less than provided for the Report.

2. Making amendments to this Program

1. The Head of the Company shall ensure the arrangement of feedback mechanisms and other internal processes aimed at maintaining and continuously improving this Program.

2. This Program shall be reviewed in the following cases:

1) based on the results of:

assessment of corruption risks in the Company's activities;

supervision and monitoring of compliance with this Program, as well as assessment of the results of implementing the measures provided for by it;

2) if amendments are made to the legislation, including anti-corruption ones, that affect the Company's activities;

3) in case of changes in the organizational structure and activities of the Company.

3. The initiator of making amendments to this Program may be the Authorized Person, the head, the Supervisory Board, officials, employees of the Company.

4. Proposals for making amendments to this Program shall be submitted to the Authorized Person, who studies and systematizes them.

5. Once a year, the Authorized Person shall provides the head of the Company with a summary of proposals for making amendments to this Program and provide his/her recommendations for their consideration or rejection.

6. The head of the Company, having received from the Authorized Person a summary of proposals for making amendments to this Program, shall initiate an open discussion of them by the employees (the labor collective).

7. In cases where the Authorized Person insists on making urgent amendments to this Program, the head of the Company shall initiate an appropriate discussion as soon as possible, but not later than 10 days from the date of receipt of such proposals.

8. If proposals for making amendments to this Program are approved by the employees (labor collectives) of the Company, the head of the Company shall approve the relevant changes by his/her decision (order), which are an integral part of this Program.

9. The amendments to this Program may not set standards and requirements lower than those provided for by the Law of Ukraine On Prevention of Corruption and the standard anti-corruption program of a legal entity approved by the order of the National Agency for the Prevention of corruption.

Annex 1
to the Anti-Corruption Program
of the State Enterprise “Polygraph Combine
“Ukraina” for securities’ production”

**Obligations for compliance with requirements of
the Anti-Corruption Program of the State Enterprise “Polygraph Combine
“Ukraina” for securities’ production”**

Full name _____

Title _____

I am familiar with and undertake to comply with the requirements and fulfill the duties stipulated by the Anti-Corruption Program of the State Enterprise “Polygraph Combine “Ukraina” for securities’ production”.

I have been notified that I may bear responsibility in accordance with the current legislation for violating the Anti-Corruption Program of the State Enterprise “Polygraph Combine “Ukraina” for securities’ production”.

" _____ "

(signature)

(initials and surname)