

APPROVED

the minutes of the meeting of the Supervisory Board  
of Polygraph Combine “Ukraina”  
dated January 27, 2025 No. 03

## **POLICY**

### **on preventing and combating corruption of Polygraph Combine “Ukraina” for 2025**

Polygraph Combine “Ukraina” (hereinafter referred to as the Enterprise) proclaims a policy of zero tolerance to corruption as a phenomenon and absolute inadmissibility of any form of corruption (hereinafter referred to as the Policy).

In accordance with the Policy, the Supervisory Board, management and employees of the Enterprise in their work, in legal relations with customers, business partners, and public authorities are guided by the Enterprise's values of integrity, transparency of business activities and prevention of corruption, the principle of zero tolerance to any manifestations of corruption; strictly comply with the requirements of Ukrainian legislation and internal documents of the Enterprise on preventing and combating corruption.

By this Policy, the Enterprise openly demonstrates and expresses its principled position on corruption as illegal and violating the moral and ethical principles of doing business.

**The management of Polygraph Combine “Ukraina” considers the following strategic directions of the Enterprise 's activities in the field of preventing and combating corruption to be important:**

- Compliance with the legal requirements for preventing and combating corruption at the Enterprise, including the receipt of unlawful benefits (bribery) by employees;
- Encouraging employees to report reliable information that they have become aware of possible facts of receiving unlawful benefits (bribery), ensuring confidentiality and protection from prosecution and punishment;
- Empowering each employee to fulfill their tasks, taking into account the requirements of the management system for preventing and combating corruption;
- Determining, in accordance with the law, disciplinary measures that may be applied to employees of the Enterprise for non-compliance with this policy;
- Managing risks and opportunities to increase the efficiency and improve the effectiveness of the management system for preventing and combating corruption and its processes;

**The management of Polygraph Combine “Ukraina” assumes responsibility for:**

- the effectiveness of the management system for preventing and combating corruption in accordance with the requirements of national legislation and ISO 37001:2016 and for the implementation of this Policy, providing appropriate conditions and availability of necessary assets;
- updating the Anti-Corruption Program and other internal documents of the Enterprise to prevent and combat corruption.

**The management of Polygraph Combine “Ukraina” undertakes to analyze and review this Policy periodically for its continued suitability for the needs of the Enterprise and compliance with the requirements of national legislation and ISO 37001:2016.**

This Policy is the basis for establishing and reviewing the Objectives of the integrated management system of the Enterprise.

**Director of Polygraph Combine “Ukraina”    /signature/    Tetiana BONDARENKO**