ANTI-CORRUPTION PROGRAM

ZORYA SECURITY PRINTING

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PREAMBLE (VALUES)

By this Anti-Corruption Program (hereinafter – the Program), the ZORYA SECURITY PRINTING (hereinafter – the Company), being aware of its responsibility for upholding the values of the rule of law and integrity, striving to ensure its sustainable development, caring for its own business reputation, and in order to encourage the use of fair commercial practices, and also in the interests of, in particular but not exclusively, its founders, employees, business partners and clients, declares that its founders (participants), management bodies, officials and employees in their activities, as well as in legal relations with business partners, state authorities, local self-government bodies, other legal entities and individuals, are guided by the principle of zero tolerance to corruption in any of its forms and manifestations, and take (and will take) all measures for preventing, detecting and countering corruption as provided by law and by this Program.

The Company states its principled position and condemns corruption as an unlawful and unethical way of conducting business.

I. GENERAL PROVISIONS

1. Definitions

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

Charitable activity – voluntary personal and/or property assistance directed at promoting the legitimate interests of recipients of charitable aid in the areas of charitable activity defined by law, which does not provide for the Company receiving profit, or for any reward or compensation to the Company on behalf of or on the instructions of the recipient of charitable aid;

Contribution to support a political party – monetary funds or other property, advantages, benefits, services, loans (credits), intangible assets, any other benefits of a non-material or non-monetary nature, sponsorship by the Company of events or other activities in support of a party, goods, works or services provided by the Company free of charge or on preferential terms (at a price below the market value of identical or similar works, goods and services on the relevant market), received by a political party or its local organization that has duly obtained legal entity status;

Business hospitality – representative events (e.g., business breakfasts, lunches, dinners, buffets, tastings, other events (conferences, cultural and sporting events)), reimbursement of travel, accommodation and other costs, carried out by the Company or in relation to the Company for the purpose of establishing or developing business relationships or for another purpose related to the Company's activities;

Business relations – relations between the Company and a business partner related to the business, professional or economic activities of the Company, arising on the basis of a transaction or other activity by the Company, and intended to last after their establishment;

Business partners – legal entities and/or individuals with whom the Company maintains, enters into, or intends to enter into business relations;

Facilitating payments – unofficial and illegal payments to officials for the purpose of facilitating/accelerating/simplifying or, in certain cases, ensuring proper performance of procedures established by law, which the Company has a legal right to receive without making such payments;

Corruption risk – the probability of committing a corruption-related offence or other violation of the Law of Ukraine "On Prevention of Corruption" that would negatively affect the Company's activities;

Improper advantage – monetary funds or other property, advantages, benefits, services, intangible assets, any other benefits of a non-material or non-monetary nature, which are offered, promised, provided or received without lawful grounds;

Zero tolerance to corruption – absolute intolerance to corruption in any of its manifestations;

Representative of the Company – a person duly authorized to act on behalf of or in the interests of the Company in dealings with third parties;

Official person: a person authorized to perform the functions of the state or local self-government in accordance with paragraph 1 of part one of Article 3 of the Law of Ukraine "On Prevention of Corruption"; a person equated to persons authorized to perform the functions of the state or local self-government in accordance with paragraph 2 of part one of Article 3 of that Law; a patronage service employee under Article 92 of the Law of Ukraine "On Civil Service"; a candidate for the post of President of Ukraine or a candidate for people's deputy of Ukraine registered as prescribed by law; the head or another official of a business entity in which the state or communal share exceeds 50%; a foreign state official (a person holding a position in a legislative, executive or judicial body of a foreign state, including jury members, and any other person performing state functions for a foreign state, including for a state body or state-owned enterprise); a foreign arbitrator authorized to resolve civil, commercial or labour disputes in a foreign state through a procedure alternative to court; an official of an international organization (an employee of an international organization or any other person authorized by such organization to act on its behalf); a member of an international parliamentary assembly of which Ukraine is a member; a judge or official of an international court;

Sponsorship activity (sponsorship) – voluntary material, financial, organizational and other support by the Company of any event or activity for the purpose of promoting the Company's name, trademarks and service marks.

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

1. The purpose of this Program is to ensure the operation of an effective system for preventing and countering corruption, and for ensuring the Company's activities comply with anti-corruption legislation, taking into account best global practices.

2. This Program establishes a set of measures (rules, standards and procedures) for preventing, detecting and countering corruption in the Company's activities, no less in scope and content than those provided for in the Law of Ukraine "On Prevention of Corruption" and

the Standard Anti-Corruption Program for Legal Entities approved by order of the National Agency for the Prevention of Corruption.

3. Measures for preventing, detecting, eliminating or minimizing corruption risks are recognized as priorities in the Company's activities.

4. This Program is mandatory for founders (participants), the head, management bodies, officials at all levels, employees, representatives of the Company, and persons undergoing training at the Company or performing certain work on the basis of civil law contracts concluded with the Company.

5. This Program is mandatory for all business entities (subsidiaries, separate units, branches, representative offices) over which the Company exercises control.

6. This Program applies to all areas of the Company's activities, including relations with business partners, official persons, state authorities and local self-government bodies, and other legal entities and individuals.

7. Provisions on the mandatory compliance with and implementation of this Program are included in the Company's internal labor regulations, regulations on structural units, all employment contracts (including contracts), and job descriptions.

8. This Program is approved by decision (order) of the Company's head after discussion with officials at all levels and with employees of the Company.

9. The text of this Program is permanently and publicly available to employees, officials at all levels, management bodies, and representatives of the Company, as well as to its business partners, in paper form (administration office) and/or electronic form (the Company's internal information system), and also on the Company's website (www.pc-zorya.com.ua).

3. Responsible Leadership, Business Reputation and Integrity

1. The head, management bodies, and officials at all levels of the Company commit to forming, by personal example of ethical conduct, a culture of zero tolerance to corruption among Company employees, which is the foundation of the Company's business culture, everyday business practice and business reputation.

2. The head and management bodies of the Company commit to demonstrating leadership and responsibility with regard to:

1) compliance with anti-corruption legislation requirements;
2) ensuring proper implementation, effective operation, periodic analysis, timely review and improvement of the system for preventing and countering corruption in the Company, in order to adequately respond to corruption risks in the Company's activities;
3) promoting a culture of zero tolerance to corruption in all areas of the Company's activities;
4) appointing a person responsible for implementing this Program (hereinafter – the Authorized Person), providing appropriate material and organizational working conditions, facilitating the Authorized Person's performance of tasks and functions prescribed by the Law of Ukraine "On Prevention of Corruption" and this Program, and ensuring the independence of the Authorized Person's activities;
5) encouraging officials at all levels to demonstrate leadership in preventing and countering corruption within their powers;
6) directing employees to support the Company's anti-corruption policy and to make a personal contribution to the effectiveness of the system for preventing and countering corruption;
7) informing about the anti-corruption policy both within the Company and in dealings with business partners, official persons, state authorities, local self-government bodies, and other legal entities and individuals;

8) ensuring, in accordance with the Law of Ukraine "On Prevention of Corruption", conditions for reporting information about possible instances of corruption-related offences and other violations of the Law of Ukraine "On Prevention of Corruption";
9) observing the rights and guarantees of whistleblower protection provided for in the Law of Ukraine "On Prevention of Corruption";
10) timely and appropriate response, in accordance with the law, to acts of (possible) corruption-related offences by management body members, officials at all levels, and employees.

4. Professional Ethics Standards

1. Founders (participants), the Company's head, management body members, officials at all levels, the Authorized Person, employees and representatives of the Company, in the performance of their official (contractual) duties, shall:

1) strictly adhere to generally accepted ethical norms of conduct and the requirements of the Company's code of ethics (if any);
2) show tolerance and respect for the political views, ideological and religious convictions of others;
3) act regardless of personal interests, personal attitude towards any persons, and regardless of their political, ideological, religious or other personal views or beliefs;
4) not disclose or use in any other way confidential information that became known to them in connection with the performance of their official (contractual) duties, except as provided by law;
5) competently, timely, effectively and responsibly perform official (contractual) duties, decisions and instructions of the bodies and officials to whom they are subordinate, accountable or answerable, and not allow abuse or ineffective use of the Company's funds and property.

2. Founders (participants), the head, management bodies, officials at all levels, the Authorized Person, employees and representatives of the Company shall refrain from clearly criminal actions, decisions and instructions, and take measures to revoke such decisions and instructions.

3. Officials at all levels, the Authorized Person, employees and representatives of the Company are obliged to refrain from implementing clearly criminal decisions or instructions.

4. If clearly criminal decisions or instructions are received for implementation, the official, Authorized Person, employee or representative of the Company must immediately notify in writing their direct supervisor or the Company's head, or its founders (participants), and the Authorized Person.

5. An official, Authorized Person or employee may not be dismissed or forced to resign, subjected to disciplinary action, or subjected to other negative measures of influence or threats thereof by management in connection with refusal to implement clearly criminal decisions or instructions.

6. Officials and employees of the Company, and the Authorized Person, cannot be subjected to disciplinary action for refusing to participate in corrupt acts, even if such refusal may lead to the Company losing a competitive advantage or potential benefit.

II. RIGHTS, OBLIGATIONS, AND PROHIBITIONS

1. Rights and Obligations of Founders (Participants), the Head, Management Body Members, Officials at All Levels, Employees (Other Than the Authorized Person), and Representatives of the Company

1. Founders (participants), the Company's head, management body members, officials at all levels, employees and representatives of the Company have the right to:

1) submit proposals for improving this Program;
2) contact the Authorized Person for consultations and explanations regarding compliance with this Program and other internal Company documents relating to corruption prevention and anti-corruption legislation;
3) receive recommendations from the Authorized Person regarding further actions if planned activities or decisions (transactions) may be a source of corruption risks.

2. Founders (participants), the Company's head, management body members, officials at all levels, employees and representatives of the Company 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, and also ensure the implementation of this Program;
2) perform their official (contractual) duties taking into account the lawful interests of the Company;
3) promptly inform the Authorized Person, the head (head of the executive body) of the Company, or the founders (participants) of the Company, in the manner prescribed by this Program, of any instances of violation of this Program (or of incitement to such actions), commission of corruption-related offences, or other violations of the Law of Ukraine "On Prevention of Corruption" by founders, the head, management body members, officials, employees or existing or potential business partners;
4) promptly inform, in the manner prescribed by this Program, of the emergence of a real or potential conflict of interest; take measures to prevent and resolve a real or potential conflict of interest; and not take actions or make decisions in conditions of a real conflict of interest;
5) refrain from conduct that may be interpreted as readiness to commit a corruption-related offence connected with the Company's activities;
6) inform the Authorized Person of the provision and receipt of business hospitality, and of giving and receiving gifts in the manner prescribed by the Company;
7) take into account and consider the recommendations of the Authorized Person.

2. Prohibited Corrupt Practices

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

1) accepting an offer, promise or receiving an improper advantage, or requesting the provision of such advantage for themselves or another physical or legal entity, in exchange for performing or failing to perform any actions using the position they hold at the Company, or in connection with their activities in the interests of the Company, in the interests of the person who offers, promises or provides such advantage, or in the interests of a third party;
2) abusing their powers, i.e., intentionally, for the purpose of obtaining improper advantage for themselves or another physical or legal entity, using their powers contrary to the interests of the Company;

3) offering, promising or providing (directly or through a third party) improper advantage to official persons and/or their close persons, or other individuals, for performing or failing to perform any actions/inaction using the authority, official position or powers granted to them, for the purpose of obtaining or preserving any advantages for the Company;
4) taking actions and making decisions in conditions of a real conflict of interest;
5) using any property of the Company or its funds for personal interests;
6) organizing, acting as an intermediary, or personally carrying out any cash or non-cash payments or settlements with the Company's business partners, other physical or legal entities, if such payments or settlements are not provided for by legislation or by transactions concluded by the Company;
7) directly or indirectly influencing the decisions of the Company's employees for the purpose of obtaining improper advantage for themselves or others;
8) taking any actions that directly or indirectly incite other employees or officials at any level to violate the requirements of the Law of Ukraine "On Prevention of Corruption" or this Program;
9) giving and receiving gifts in violation of the requirements of legislation and this Program regarding the provision and receipt of business hospitality and gifts;
10) after dismissal or other termination of cooperation with the Company, disclosing or using in any other way in their own interests information, including confidential information, that became known to them in connection with the performance of their powers or contractual obligations, except as provided by law.

2. The Company prohibits payment of facilitating payments to official persons, in particular for the purpose of accelerating any formal procedures related to obtaining permits or the adoption of relevant decisions in favor of the Company, or obtaining other advantages for the Company.

A payment for expedited review paid to the account of a state authority or local self-government body, enterprise, institution, organization, official person, or state/local budget, the amount and payment of which is provided for by legislation (e.g., a payment for expedited patent registration), shall not constitute a facilitating payment.

An official, employee or representative of the Company who receives a demand to make a facilitating payment is obliged to notify the person making such demand of the prohibition on making it, to refuse to make such payment, and to promptly inform their direct supervisor and the Authorized Person of the demand received.

If any doubt arises as to whether a payment constitutes a facilitating payment and whether it is prohibited, such official, employee or representative of the Company must seek advice from the Authorized Person.

3. The prohibitions apply without any territorial restrictions, in the territory of any state, regardless of national traditions, local practices or competitive conditions in that state.

III. LEGAL STATUS OF THE AUTHORIZED PERSON AND SUBORDINATE EMPLOYEES

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 is appointed by the founders (participants) or the Company's head to a separate position in accordance with labor law and the Company's constituent documents.

The Authorized Person is subordinate, accountable and answerable to the Company's head.

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 early in cases provided for by the Law of Ukraine “On Prevention of Corruption”.

The Authorized Person may be dismissed on the initiative of the Company’s head or its founders (participants) subject to the consent of the National Agency for the Prevention of Corruption in the prescribed manner.

3. In performing their functions, the Authorized Person may involve employees of a subordinate structural unit (if such a unit exists), as well as (with the consent of the Company’s head) other employees of the Company, by giving them oral and written instructions and monitoring their implementation.

Employees of a structural unit subordinate to the Authorized Person are appointed to and dismissed from their positions (in the event of termination of the employment contract on the initiative of the Company’s head or its founders (participants)) with the consent of the Authorized Person.

4. For the implementation of this Program, by decision of the Company’s head, responsible persons may be appointed in the Company’s separate units without legal entity status (hereinafter – Responsible Persons).

Responsible Persons perform the obligations and exercise the rights provided in this Program for the Authorized Person, within the activities of the Company’s separate units without legal entity status in which they work.

The Authorized Person, in the performance of their official duties, has the right to give oral and written instructions and require their implementation from Responsible Persons, and shall monitor the activities of Responsible Persons.

2. Obligations and Rights of the Authorized Person

1. Obligations of the Authorized Person:

1) to perform their duties impartially;
2) to organize the preparation of, develop, and submit for approval to the head (executive body) internal Company documents on the formation and implementation of this Program;
3) to organize periodic assessments of corruption risks in the Company’s activities;
4) to ensure interaction and coordination between structural units of the Company regarding the preparation, implementation and monitoring of measures provided for in this Program;
5) to provide founders (participants), the head, management bodies, officials at all levels, and employees of the Company with explanations and individual consultations related to the implementation of this Program and compliance with anti-corruption legislation;
6) to provide employees or persons undergoing training at the Company, or performing certain work on the basis of civil law contracts concluded with the Company, with methodological assistance and consultations regarding reporting possible instances of corruption-related offences and other violations of the Law of Ukraine “On Prevention of Corruption” and the protection of whistleblowers, and to conduct training on these matters;
7) to ensure public awareness of the Company’s anti-corruption measures;
8) to organize professional development events for Company employees on corruption prevention and countering;
9) to regularly, at least once every 2 years, enhance their professional qualifications and initiate discussions with the Company’s head regarding professional training (qualification enhancement);

10) to take measures to identify conflicts of interest and facilitate their resolution, and to inform the Company's head of identified conflicts of interest and the measures taken to resolve them;
11) to organize and conduct checks of the Company's business partners and checks in merger and acquisition procedures;
12) to participate in the Company's personnel selection procedures, in particular by initiating, organizing and conducting checks of candidates for positions;
13) to check for corruption risks and approve payments and expenses related to charitable and sponsorship activities and contributions in support of political parties;
14) to check for corruption risks and approve (endorse) draft organizational and administrative documents and transactions of the Company;
15) to organize the operation of internal channels for reporting possible instances of corruption-related offences and other violations of the Law of Ukraine "On Prevention of Corruption";
16) to receive and organize the review and verification of reports of possible instances of corruption-related offences and other violations of the Law of Ukraine "On Prevention of Corruption";
17) to participate in internal investigations conducted in accordance with this Program;
18) to inform the Company's head or founders (participants) of facts that may indicate the commission of corruption-related offences or other violations of the Law of Ukraine "On Prevention of Corruption" by management body members, officials at all levels, employees or representatives of the Company;
19) upon identifying a corruption-related offence or receiving a report of such an offence by management body members, officials at all levels, or employees of the Company, to take measures to stop such an offence and to notify in writing, within 24 hours, the specially authorized anti-corruption subject;
20) to organize and participate in investigations aimed at identifying the causes and conditions that led to the commission of a corruption-related offence or other violation of the Law of Ukraine "On Prevention of Corruption", upon submission of the specially authorized anti-corruption subject or directive of the National Agency for the Prevention of Corruption;
21) to cooperate with whistleblowers and ensure observance of their rights and guarantees of protection as provided by the Law of Ukraine "On Prevention of Corruption";
22) to inform whistleblowers of their rights and obligations provided by the Law of Ukraine "On Prevention of Corruption", and of the status and results of the review, verification and/or investigation of the information they reported;
23) to inform the National Agency for the Prevention of Corruption if the HR department fails to send a certified paper copy of the disciplinary action order and the information card to the order, for entry into the Unified State Register of Persons Who Have Committed Corruption-Related Offences;
24) to ensure the formation and maintenance of registers of: employees subjected to liability for violations of this Program or corruption-related offences; checks conducted under this Program; internal investigations conducted; reports of conflicts of interest or violations; business hospitality and gifts;
25) to monitor, control and oversee compliance with this Program and anti-corruption legislation;
26) to assess the results of the implementation of measures provided for in this Program;
27) to prepare a report on the implementation status of this Program;
28) to participate in cooperation with state authorities, local self-government bodies, other legal entities, non-governmental and international organizations on corruption prevention matters;

29) to perform other official duties provided for by the Law of Ukraine “On Prevention of Corruption”, this Program, internal Company documents, and in particular those aimed at reviewing whistleblower reports and ensuring their rights and guarantees of protection.

2. Rights of the Authorized Person:

1) to receive oral and written explanations from management bodies and their members, officials at all levels, employees and representatives of the Company regarding circumstances that may indicate violations of the Law of Ukraine “On Prevention of Corruption” and this Program;
2) to summon and interview persons whose actions or inaction relate to facts reported by a whistleblower, including officials at all levels of the Company;
3) to access, subject to restrictions established by law, documents and information held by the Company that are necessary for the performance of assigned duties, and to make or receive copies thereof;
4) to request from other structural units of the Company information, documents or copies thereof, including those containing restricted access information (except state secrets), necessary for the performance of assigned duties;
5) to process information, including personal data, in compliance with personal data protection legislation;
6) to access the Company’s storage, production and other premises where necessary for anti-corruption measures;
7) to access electronic data storage and processing devices available at the Company that are necessary for the performance of assigned duties, and where necessary to require the formatting of relevant data on paper;
8) to sign and send information requests to state authorities, local self-government bodies, enterprises, institutions and organizations of all forms of ownership, and separate units of the Company without legal entity status, for the purpose of obtaining information and materials directly related to the performance of the Authorized Person’s duties;
9) to sign and send letters to the National Agency for the Prevention of Corruption or other specially authorized anti-corruption subjects reporting corruption-related offences or other violations of the Law of Ukraine “On Prevention of Corruption”;
10) to monitor the activities of Responsible Persons in separate units of the Company, and to give them instructions and orders and require their implementation;
11) to contact the National Agency for the Prevention of Corruption regarding violations of the rights of a whistleblower or their close persons;
12) to designate among subordinate employees a specific person responsible for the Authorized Person’s powers relating to whistleblower protection;
13) to exercise other powers provided for by the Law of Ukraine “On Prevention of Corruption”, aimed at comprehensive review of reports of corruption-related offences and other violations of the Law of Ukraine “On Prevention of Corruption”, including whistleblower reports, and protection of their rights and freedoms;
14) to initiate checks on the grounds provided for by the Law of Ukraine “On Prevention of Corruption” and this Program;
15) to initiate internal investigations in connection with possible violations of the Law of Ukraine “On Prevention of Corruption” and this Program;
16) to submit proposals to the Company’s head for imposing disciplinary liability on persons guilty of violating the Law of Ukraine “On Prevention of Corruption” or this Program;
17) to participate in meetings of working groups and commissions of the Company on matters within the Authorized Person’s competence;

18) to initiate meetings on corruption prevention and detection and on the implementation of this Program;
19) to involve Company employees in the performance of their powers with the consent of the Company's head;
20) to submit proposals to the Company's head for improving the work of the Authorized Person;
21) to contact founders (participants), the head, and management bodies of the Company on matters relating to the exercise of their powers and performance of official duties;
22) other rights provided for by the Law of Ukraine "On Prevention of Corruption", this Program, the employment contract, the Authorized Person's job description, and other internal Company documents.

3. Independence Guarantees

1. The Authorized Person's performance of their functions in the Company is independent. Interference in the activities of the Authorized Person by founders (participants), the Company's head, management bodies and their members, officials at all levels, employees, representatives, business partners of the Company, as well as by other persons, is not permitted.

2. Interference means:

1) refusal to provide the Authorized Person with information, documents, or access to information and documents to which the Authorized Person is entitled;
2) any influence on the Authorized Person's decisions and actions that is exercised beyond the powers of the management body/person exerting influence, as established by legislation, the Company's charter, decisions of management bodies or internal Company documents;
3) actions/inaction that limit or violate the Authorized Person's rights;
4) actions/inaction that obstruct the Authorized Person's performance of official duties;
5) assigning to the Authorized Person obligations or giving instructions on matters that do not fall within or go beyond the scope of their powers as defined by the Law of Ukraine "On Prevention of Corruption" and this Program.

3. The Authorized Person may not be dismissed or forced to resign, subjected to disciplinary action, or subjected by founders (participants), the head, or management bodies of the Company to other negative measures of influence (transfer, performance review, change of working conditions, refusal of promotion, salary reduction, refusal to renew the employment contract, etc.) or threats thereof in connection with the implementation of anti-corruption measures, the detection and reporting of possible instances of corruption-related offences, or other violations of the Law of Ukraine "On Prevention of Corruption".

4. Founders (participants), the head, management bodies, and officials at all levels of the Company are obliged to:

1) ensure the independence of the Authorized Person;
2) provide the Authorized Person with appropriate material and organizational working conditions (a separate office, a safe for storing documents, a workstation equipped with office furniture, computer equipment and office technology, internet access, stationery, communication tools, an email account) and sufficient resources for the performance of assigned tasks;
3) facilitate the Authorized Person's performance of tasks provided for by the Law of Ukraine "On Prevention of Corruption" and this Program; provide information and documents necessary for the performance of assigned duties upon the Authorized Person's request; facilitate the conduct of internal investigations; and ensure the involvement of employees/resources for the performance of duties by the Authorized Person and their subordinate employees;

4) respond within a reasonable timeframe to written and oral appeals, proposals and recommendations of the Authorized Person submitted within the implementation of this Program.

IV. CORRUPTION RISK MANAGEMENT

1. For effective corruption prevention in its activities, the Company applies a risk-based approach and creates a risk management system providing for regular assessment of corruption risks to which the Company's activities may be exposed, implementation of measures necessary and sufficient for their elimination or minimization, their further monitoring and control, as well as updating existing anti-corruption measures in accordance with changes in the Company's internal and external environment.

2. The Company conducts periodic assessments of corruption risks in its activities, aimed at:

1) identifying internal and external corruption risks in the Company's business processes;
2) assessing the adequacy, relevance and effectiveness of existing measures for properly preventing, eliminating or minimizing identified corruption risks;
3) analyzing and evaluating (determining the levels of) identified corruption risks;
4) prioritizing high-risk business processes taking into account the nature and degree of vulnerability of business processes to corruption risks, and the assessed levels of corruption risks;
5) developing measures for the effective elimination or minimization of corruption risks in the Company's activities.

3. The organization of periodic corruption risk assessments in the Company's activities is carried out by the Authorized Person.

4. The Company may conduct internal and/or external corruption risk assessments. Internal corruption risk assessment is conducted by a working group formed from representatives of the Company's structural units. External corruption risk assessment is conducted by audit, legal and consulting companies or independent experts engaged by the Company.

5. The Company conducts corruption risk assessments in its activities at least once every 2 years.

6. The Company may decide to conduct a corruption risk assessment under the procedure defined by law.

7. Based on the results of corruption risk assessments, a risk register is formed.

8. The risk register must contain: identified corruption risks, the areas (directions) of the Company's activities in which they are identified, their descriptions, sources, existing control measures and an assessment of their adequacy, relevance and effectiveness; the levels of identified corruption risks; proposals for measures to eliminate or minimize identified corruption risks (including updated/new anti-corruption measures at the Company level and/or at the business process level), deadlines for their implementation, responsible units/performers, required resources, and performance indicators.

9. The risk register, once formed based on the results of the corruption risk assessment, is submitted for approval to the Company's head (executive body).

10. The Company's head (executive body) approves the risk register and ensures implementation of the measures provided therein, including by updating existing anti-corruption measures, and allocates the necessary resources.

11. Upon request of a founder (participant) of the Company, the risk register is made available to them.

12. The risk register is provided for implementation to the responsible units/performers and may also be published on the Company's website for review by all interested parties.

13. The Authorized Person monitors the implementation of measures to eliminate or minimize identified corruption risks, and prepares and submits reports on the status of measure implementation in the manner and within the timeframes established by this Program.

V. AWARENESS-RAISING MEASURES

1. Periodic Training on Corruption Prevention and Detection

1. In order to foster an appropriate level of anti-corruption culture, the Authorized Person ensures the organization of mandatory familiarization with the provisions of the Law of Ukraine “On Prevention of Corruption”, this Program, and internal Company documents adopted for its implementation for newly appointed employees, representatives of the Company, and persons undergoing training at the Company or performing certain work.

2. The Company ensures adequate and sufficient communication of the provisions of this Program and internal Company documents in the field of corruption prevention and countering, as well as changes in anti-corruption legislation and application practice, to all employees, representatives and business partners of the Company.

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

4. The Company ensures periodic professional development (training) for the head, management body members, officials at all levels, employees, the Authorized Person, and, where necessary, representatives of the Company.

5. The Company’s head and the Authorized Person undergo professional development (training) on corruption prevention and detection at least once every 2 years.

6. Scheduled training for other officials of the Company is carried out in accordance with: the thematic schedule approved by the Company’s head for each year, prepared by the Authorized Person; and separate documents communicated to the Company by the parent (holding) company for implementation.

7. Anti-corruption training programs (basic and advanced) are implemented both remotely and in person.

8. The topics and format of training events (seminars, lectures, workshops, trainings, individual sessions, webinars, etc.) are determined taking into account: changes in legislation; proposals from founders, the head, management bodies, officials, and employees of the Company; results of monitoring/assessment of Program implementation; results of periodic corruption risk assessments; results of conducted checks and internal investigations; results of anti-corruption legislation compliance checks by the National Agency for the Prevention of Corruption.

9. If instances of corruption-related offences are identified in the Company’s activities, the Authorized Person compiles a list of employees involved in high-risk business processes who must undergo mandatory unscheduled training, and forms and implements the relevant training program.

10. Training concludes with testing of participants on their level of comprehension of the training material, or by another form of output knowledge assessment.

11. The Authorized Person maintains records of professional development events in the field of corruption prevention and detection, records of attendance, and assesses their effectiveness.

2. Providing Employees with Explanations and Consultations by the Authorized Person

1. If there are questions regarding the interpretation of specific provisions of this Program, founders (participants), the head, management body members, officials at all levels, employees and representatives of the Company may contact the Authorized Person for an oral or written explanation or consultation.

2. The Authorized Person provides an explanation or consultation within a reasonable timeframe, but no later than 10 days from the date of receipt of the request. If it is not possible to provide an explanation or consultation within the specified timeframe, the Authorized Person may extend the review period, and must notify the person who made the request accordingly. The total review period may not exceed 30 days from the date of receipt of the request.

3. The Authorized Person summarizes the most frequently asked questions and answers, and publishes general explanations (consultations, etc.) of an informational nature on resources accessible to all Company employees and/or distributes them in other ways (e.g., by email).

4. The Authorized Person may choose other forms of providing explanations and consultations on the implementation of this Program and anti-corruption legislation (information sheets, guidelines, video addresses, etc.).

VI. PREVENTION AND VERIFICATION MEASURES

1. Prevention and Resolution of Conflicts of Interest

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

2. The Company prevents and resolves conflict of interest situations based on the following principles:

   1) mandatory reporting by employees of situations showing signs of a conflict of interest;
   2) prevention of conflicts of interest from arising;
   3) individual approach to the review and assessment of each separate case showing signs of a conflict of interest.

3. Employees of the Company are obliged, no later than the next business day from the day they became aware or should have become aware of a real or potential conflict of interest, to notify in writing their direct supervisor and the Authorized Person, to refrain from taking actions or making decisions in conditions of a real conflict of interest, and to take measures to prevent and resolve a real or potential conflict of interest.

4. In the event of a real or potential conflict of interest arising for the Company’s head, they notify in writing the Authorized Person and the person or body (including collegial) that is authorized to dismiss/initiate dismissal of the Company’s head.

5. In the event of a real or potential conflict of interest arising for a representative of the Company, they notify in writing the Authorized Person.

6. In the event of a real or potential conflict of interest arising for the Authorized Person, they notify in writing the Company’s head.

7. The direct supervisor of the relevant person, within two business days of receiving a notification of a real or potential conflict of interest, takes a decision on the method of resolving the conflict of interest, taking into account the recommendations of the Authorized Person, and notifies the employee thereof.

8. A direct supervisor who becomes aware of a conflict of interest affecting a subordinate employee (including upon independent identification of a conflict of interest existing for a subordinate without them having made the relevant notification), is obliged to inform the Authorized Person and to take the measures provided for in this Program to prevent and resolve the conflict of interest.

9. Conflict of interest resolution is achieved using one or more of the following measures (separately or in combination):

1) removal of the employee from performing a task, taking an action, or making or participating in a decision in conditions of a real or potential conflict of interest;
2) application of external monitoring of the person's performance of the relevant task, actions or decisions;
3) restriction of the employee's access to certain information;
4) review of the scope of the employee's official (functional) duties;
5) transfer of the employee to another position;
6) dismissal of the employee.

10. The procedure for applying conflict of interest resolution measures, and their specifics for different categories of persons, are established by the Authorized Person.

11. A decision on resolving a conflict of interest in the activities of the Company's head is made by the person or body that is authorized to dismiss/initiate dismissal of the Company's head, within two business days of receiving the notification. The person concerned and the Authorized Person are promptly notified of the decision taken.

12. Employees of the Company may independently take measures to resolve a conflict of interest by eliminating the relevant private interest, providing supporting documents to the direct supervisor and the Authorized Person.

13. The Company's head may independently take measures to resolve a conflict of interest by eliminating the relevant private interest, providing supporting documents to the Authorized Person and to the person or body authorized to dismiss/initiate dismissal of the Company's head.

14. In the event of a real or potential conflict of interest affecting a member of a collegial body (management body, commission, working group, tender committee, etc.) when the body is deciding a matter, such person notifies the relevant collegial body and the Authorized Person in writing.

15. The relevant person is prohibited from:

1) participating in the preparation of documents for the adoption of a decision by the collegial body on the relevant matter;
2) participating in the review (discussion) of the relevant matter;
3) voting on the relevant matter.

16. If non-participation by a member of the Company's collegial body would result in a loss of quorum, such person's participation in decision-making must be subject to external monitoring. The decision on external monitoring is made by the relevant collegial body.

17. External monitoring is carried out through the Authorized Person's participation in the work of the collegial body as an observer without the right to vote.

2. Relations with Business Partners

1. The Company strives to cooperate with business partners who conduct their activities lawfully and ethically, and whose dealings do not carry corruption risks for the Company.

2. The Company informs business partners prior to establishing business relations with them of the Company's principles and requirements in the field of corruption prevention and countering, as provided for in this Program and other policies developed for its implementation, including the procedure for checking business partners.

3. The Company checks potential business partners (prior to concluding transactions) and existing business partners (after establishing legal relations with them).

4. Checks of potential or existing business partners are conducted by the Authorized Person. Other structural units of the Company may also be involved in conducting checks.

5. The criteria, grounds, procedure and frequency of checking the Company's business partners are determined in internal Company documents developed by the Authorized Person and approved by the head (executive body) of the Company.

6. The check procedures, frequency and criteria for selecting business partners are determined depending on the area and location of activities, the Company's structure, and the nature and level of corruption risks that may arise in dealings with a business partner.

7. Checks of the Company's business partners are conducted for the purpose of: verifying the business partner's business reputation regarding tolerance to corruption; checking whether the business partner has an anti-corruption program (or other anti-corruption policies) and its actual implementation, and the business partner's readiness to comply with the Company's principles and requirements and with anti-corruption legislation; identifying possible corruption risks in connection with concluding (performing) a transaction; and minimizing the probability of committing or verifying possible instances of corruption-related offences when establishing and/or implementing legal relations with a business partner.

8. If there are reasonable doubts about the business partner's business reputation that may lead to corruption risks for the Company, the Company reserves the right to refuse to establish/continue business relations with the business partner, taking into account the requirements of legislation.

9. Business partner check materials are stored for at least 5 years.

10. Anti-corruption clauses may be included in contracts concluded by the Company with business partners. The purpose of an anti-corruption clause is to provide the Company's guarantees of compliance with applicable anti-corruption legislation, and to obtain similar guarantees from the business partner.

3. Business Hospitality Policy and Procedures. Gifts

1. The Company, taking into account legal requirements, defines the general policy and procedures for providing and receiving business hospitality and gifts.

2. The head, management body members, officials at all levels, employees and representatives of the Company are obliged to refrain from offering business hospitality and gifts to official persons, their close persons, actual or potential business partners, their employees or representatives, if such business hospitality or gifts may be construed as an incentive or readiness to commit a corruption-related offence connected with the Company's activities.

3. Giving and receiving gifts, as well as providing and receiving business hospitality, for the purpose of establishing or maintaining business relations or for another purpose related to the Company's activities, is permitted if it meets all of the following criteria: it is not intended to influence the objectivity of any decision on concluding transactions, providing or receiving services, information, or other advantages for the Company; it is not a disguised improper

advantage; it conforms to generally accepted notions of hospitality; it is not prohibited by the legislation of the state in which it is provided and/or received; its value does not exceed the limits established by legislation and the Company; it is not prohibited by the internal documents of the recipient's organization and does not exceed the value established by such documents; its disclosure would not create reputational risks for the Company or the recipient; and the gifts and business hospitality are reasonable, non-excessive and appropriate in the context of establishing/maintaining business relations.

4. Giving and receiving gifts in the form of monetary funds (cash or non-cash), or cash equivalents (gift cards or gift vouchers), is not permitted.

5. If there is any doubt about the acceptability of a gift or business hospitality, employees must contact the Authorized Person in the manner prescribed by this Program for advice and/or explanation.

6. The head, management body members, officials at all levels, employees and representatives of the Company must notify the Authorized Person within one business day of giving or receiving a gift or business hospitality within the bounds of generally accepted notions of hospitality.

4. Charitable and Sponsorship Activities

1. The Company may conduct charitable and sponsorship activities provided there are no prohibitions established by legislation and the Company's internal documents.

2. The Company conducts charitable and sponsorship activities in accordance with legislation and subject to the absence of a substantiated finding by the Authorized Person of the existence of corruption risks.

3. The Authorized Person conducts a preliminary check of planned charitable and sponsorship activities and approves draft transactions for charitable and sponsorship activities to ensure that such assistance is not used as an improper advantage or for any other unlawful purpose.

4. The Company does not permit charitable and sponsorship activities if: such activity is a condition for concluding any transaction or for a decision by a state authority or local self-government body, or is conducted for the purpose of obtaining unlawful advantages in business activities; a business partner or official person insists on conducting a particular type of charitable and/or sponsorship activity exclusively through a specific organization; or it is conducted for the purpose of influencing an official person or in exchange for any improper advantage for the Company from business partners.

5. The Company maintains registers of contributions made to charitable and sponsorship activities. Such registers, as well as financial reporting on charitable and sponsorship operations and their recipients (beneficiaries), must be stored for at least 5 years.

5. Support of Political Parties

1. The Company does not provide support to political parties if this is directly prohibited by law or the Company's policy.

2. In the absence of prohibitions established by legislation and the Company's policy, the Company may make contributions in support of political parties in the manner established by the Law of Ukraine "On Political Parties in Ukraine".

3. The total amount of contributions in support of a political party from the Company during the year may not exceed the amount established by the Law of Ukraine "On Political Parties in Ukraine".

4. Contributions in support of political parties are made subject to the absence of a substantiated finding by the Authorized Person of the existence of corruption risks.

5. The Company maintains a register of contributions made in support of political parties. Such register, as well as financial reporting on contribution operations and their recipients, must be stored for at least 5 years.

6. Checks in Merger or Acquisition Transactions

1. When planning and conducting merger or acquisition transactions, the Company checks the legal entity – the potential merger or acquisition target – for the purpose of identifying corruption risks, verifying the purpose and procedure of executing such a transaction for compliance with anti-corruption legislation and this Program.

2. The check is conducted before and after the transaction.

3. The scope of the check is determined by the Company depending on the nature and level of corruption risks that may arise in connection with the execution of the transaction regarding a specific merger or acquisition target.

4. The Authorized Person is involved in conducting the check, as may be other persons.

5. Prior to the transaction, the check includes: examining the history and activities of the merger or acquisition target and the structure of its founders/participants/ultimate beneficial owners; identifying possible connections of the target with official persons; examining the main elements of the anti-corruption system of the target; identifying instances of corruption involving the target; checking for active sanctions applied to the target; identifying the target's counterparties with high corruption risks; examining the target's internal control mechanisms; and determining the scope and nature of matters to be addressed after the transaction.

6. After the transaction, the check includes: identifying discrepancies in the anti-corruption system of the merger or acquisition target; ensuring the compliance of the target's anti-corruption system with the nature and level of its inherent corruption risks; and determining corrective measures to bring the anti-corruption system into compliance with anti-corruption legislation.

7. If instances of corruption are identified during the anti-corruption check, the Company takes measures to stop them, reports to the specially authorized anti-corruption subjects in the prescribed manner, and prevents similar practices in the future.

7. Checks of Candidates for Positions

1. The Company, for the purpose of implementing this Program within personnel selection procedures, conducts checks of candidates for positions vulnerable to corruption risks.

2. Checks of candidates for positions are conducted to: establish whether concluding an employment contract with the candidate poses corruption risks for the Company; establish whether concluding an employment contract with the candidate would violate anti-corruption legislation; and ensure that the candidate commits to complying with the requirements of this Program.

3. The decision to conclude an employment contract is made taking into account anti-corruption legislation requirements.

4. Checks of candidates for positions vulnerable to corruption risks are conducted by the Authorized Person, who prepares a substantiated finding for the Company's head regarding the presence or absence of corruption risks.

5. Check materials for candidates for positions vulnerable to corruption risks are stored in personal files for the entire period of their retention.

VII. REPORTS, THEIR VERIFICATION AND LIABILITY

1. Reports of Possible Instances of Corruption-Related Offences and Other Violations of the Law of Ukraine "On Prevention of Corruption"

1. The Company creates favorable conditions for whistleblowers and fosters respect for whistleblowers as part of the Company's business culture.

2. The Company provides whistleblowers with conditions for reporting possible instances of corruption-related offences and other violations of the Law of Ukraine "On Prevention of Corruption" (hereinafter – Report) by: mandatory creation and operation of channels through which a person may make a Report while guaranteed to maintain anonymity (hereinafter – Reporting Channels), where necessary through the Unified Whistleblower Reporting Portal; establishing internal procedures and mechanisms for receiving and reviewing Reports and properly responding to them; providing methodological assistance and consultations to potential whistleblowers; implementing encouragement mechanisms and fostering a reporting culture; and observing whistleblowers' rights and guarantees of protection.

3. Whistleblowers independently determine which Reporting Channels to use for making a Report.

4. Confidentiality is guaranteed to whistleblowers in the manner and under the conditions established by the Law of Ukraine "On Prevention of Corruption".

5. A person may make a Report without indicating authorship (anonymously).

6. Information about Reporting Channels is communicated to all employees, including upon hiring, and is posted on the Company's notice boards and website.

7. The Company encourages business partners to report through Reporting Channels any known instances of corruption-related offences and other violations of the Law of Ukraine "On Prevention of Corruption" by the head, management body members, officials at all levels, employees and representatives of the Company.

8. A Report must contain factual data confirming the possible commission of a corruption-related offence or other violation of the Law of Ukraine "On Prevention of Corruption", which can be verified.

9. An anonymous Report is subject to review if the information contained therein concerns a specific person and contains factual data that can be verified.

10. Reporting encouragement mechanisms include: approving internal Company documents defining the forms of encouragement and organizational principles of the encouragement mechanism; providing methodological assistance and consultations; and moral and material encouragement of whistleblowers.

2. Rights and Guarantees of Whistleblower Protection

1. Whistleblowing is an honorable right of every Company employee.

2. A whistleblower has the rights and guarantees of protection provided for in Articles 53^3–53^8 of the Law of Ukraine "On Prevention of Corruption", including: the right to submit evidence supporting their Report; to receive confirmation of the receipt and registration of the Report; to confidentiality; to receive information on the status and results of the review, verification and/or investigation of the information reported; to exemption from legal liability for making the Report and disseminating the information contained therein; and to exemption from civil liability for property and/or moral damage caused as a result of making the Report, except in the case of knowingly false reporting.

3. Information about a whistleblower is accessible only to the Company's head, the Authorized Person and employees designated by them who are involved in the process of receiving and reviewing Reports.

4. In the event of a leak of confidential information about a whistleblower, the Authorized Person and the Company's head (executive body), upon the application of such person or on their own initiative, must promptly take all measures to avoid negative consequences for the whistleblower related to such disclosure.

5. The Company prohibits the intimidation, humiliation or persecution of whistleblowers, or the application to them of other negative measures of influence, or threats thereof.

6. A whistleblower may not be dismissed or forced to resign, subjected to disciplinary action, subjected to other negative measures of influence, or threatened with such measures, in connection with a Report.

3. Reports of Possible Violations of This Program

1. Employees, persons undergoing training at the Company or performing certain work, representatives, and business partners of the Company may report identified signs of violations of this Program or instances of incitement to corruption-related offences directly to the head (head of the executive body) of the Company, the Authorized Person or the founders (participants) of the Company, or by sending an electronic message to the Company's email address: v_salenko@zorya-security.com.

2. The procedure for reviewing such reports, interaction with the reporter, and guarantees of confidentiality of information about the reporter and protection of their rights, are determined by an internal Company document.

4. Conducting Internal Investigations

1. Upon receipt of a Report or identification of signs of a corruption-related offence by a management body member, official, employee or representative of the Company, or other violation of the Law of Ukraine "On Prevention of Corruption" or this Program, the Authorized Person conducts a preliminary check of the received (identified) information in accordance with the requirements of the Law of Ukraine "On Prevention of Corruption" and internal Company documents.

2. If the received (identified) information concerns the actions or inaction of the Company's head, the Authorized Person, without conducting a preliminary check, sends such information within three days to the subject authorized to review or investigate it, and sends a copy to the National Agency for the Prevention of Corruption if it is not the subject authorized to review the information.

3. In the event of a Report or identification of signs of a corruption-related offence by the Authorized Person, a preliminary check of such information is conducted in accordance with internal Company documents.

4. Based on the results of the preliminary check, the following decision(s) may be made: to take measures to stop the identified violation; to appoint an internal investigation if the facts set out in the Report are confirmed or further verification is required; to immediately notify (within 24 hours in writing) the specially authorized anti-corruption subject of the corruption-related offence; or to close the case if the facts are unconfirmed.

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

6. An internal investigation is conducted by a commission that must include the Authorized Person, except in cases where the investigation is initiated following the identification of facts or receipt of information that the Authorized Person committed a corruption-related offence.

7. All officials and employees of the Company, regardless of their position, are obliged to cooperate in the conduct of the internal investigation and to provide available documents and materials.

8. The period of an internal investigation may not exceed 30 calendar days from the date of completion of the preliminary check. If it is not possible to verify the reported (identified) information within the specified period, the Company's head may extend the internal investigation period to 45 days.

9. The Authorized Person has access to the materials of conducted internal investigations, which are stored for at least 5 years.

5. Disciplinary Liability for Violations of This Program

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

2. The HR department of the Company sends to the National Agency for the Prevention of Corruption a certified paper copy of the head's decision (order) on imposing a disciplinary sanction and an information card, for entry into the Unified State Register of Persons Who Have Committed Corruption-Related Offences.

3. The Company's head (executive body) ensures that measures are taken in response to corruption-related offences.

VIII. SUPERVISION, CONTROL, AND AMENDMENTS TO THIS PROGRAM

1. Supervision and Control

1. The Authorized Person supervises and continuously monitors compliance with this Program by founders (participants), the head, management body members, officials at all levels, employees and representatives of the Company.

2. Supervision and control over compliance with this Program is exercised by the Authorized Person through: reviewing and responding to Reports; conducting checks of the activities of Company employees regarding the implementation of this Program; conducting checks of organizational and administrative documents, transactions and other Company documents for corruption risks; and periodic monitoring of Program implementation.

3. If during supervision or control over compliance with this Program the Authorized Person identifies signs of a corruption-related offence, they initiate an internal investigation with the Company's head in the manner provided for in this Program.

4. The Authorized Person prepares a monitoring report on the implementation of this Program (hereinafter – the Report) at least once every 6 months in the timeframe and manner determined by the Company's head.

5. The Report must include information on: the status of implementation of the measures defined in this Program; the results of implementing the measures defined in this Program; identified violations of the Law of Ukraine "On Prevention of Corruption" and this Program, and measures taken to remedy such violations and prevent their recurrence; the number of checks and internal investigations conducted and their results; instances of violations of the independence guarantees of the Authorized Person; the status of implementation of measures to eliminate or minimize corruption risks; training events on corruption prevention and detection and the level of knowledge retained; cooperation with whistleblowers; newly identified corruption risks; and proposals and recommendations.

6. The Authorized Person ensures at least once a year the organization of an assessment of the results of implementing the measures provided for in this Program.

7. Assessment results are summarized by the Authorized Person in a written report, which is submitted to the head and founders (participants) of the Company.

2. Amendments to This Program

1. The Company's head ensures the organization of feedback mechanisms and other internal processes aimed at maintaining and continuously improving this Program.

2. This Program is reviewed: based on the results of corruption risk assessments; supervision and control over compliance with this Program, as well as assessment of the results of implementing its measures; in the event of changes to legislation (including anti-corruption legislation) that affect the Company's activities; and in the event of changes in the Company's organizational structure and business processes (where necessary).

3. The Authorized Person may initiate amendments to this Program, as may founders (participants), the head (executive body), officials at all levels, and employees of the Company.

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

5. Once a year, the Authorized Person provides the Company's head with a summary of proposals for amendments to this Program and their recommendations.

6. The Company's head, upon receiving the summary from the Authorized Person, initiates their open discussion with employees (the workforce) and founders (participants).

7. If founders (participants) or the Authorized Person insist on urgent amendments to this Program, the Company's head initiates the relevant discussion as soon as possible, but no later than 10 days from the date of receipt of such proposals.

8. If proposals for amendments to this Program are approved by the founder (participant) and employees (the workforce) of the Company, the Company's head approves the relevant amendments by decision (order) after open discussion, and such amendments form an integral part of this Program.

9. Amendments to this Program may not establish standards and requirements lower than those provided for in the Law of Ukraine "On Prevention of Corruption" and the Standard Anti-Corruption Program for Legal Entities approved by order of the National Agency for the Prevention of Corruption.

Authorized Person Volodymyr SALENKO