

**ANTI-CORRUPTION PROGRAM OF
Dnipropetrovsk State University of Internal Affairs for 2023-2025**

Preamble (values)

With this Anti-Corruption Program (hereinafter - the Program) of Dnipropetrovsk State University of Internal Affairs for 2023-2025, Dnipropetrovsk State University of Internal Affairs (hereinafter - DSUIA), aware of the responsibility for establishing the values of the rule of law and integrity, striving to ensure its sustainable development, taking care of its own business reputation, as well as in the interests of the state and people of Ukraine, declares that management and employees in their activities, as well as in legal relations with state authorities, local self-government bodies, legal entities and individuals, are guided by the principle of zero tolerance for corruption in any of its forms and manifestations and take (will take) all measures provided for by legislation and this program to prevent, detect and counter corruption.

DSUIA declares its principled position and condemns corruption as an illegal and unethical way of conducting business.

The program was developed for the medium-term period and is a logical continuation of the implementation of the measures provided for by the Anti-Corruption Program of Dnipropetrovsk State University of Internal Affairs for 2020-2022, approved by the Order of DSUIA on February 17, 2020 № 165. According to the results of the implementation of the Anti-Corruption Program of Dnipropetrovsk State University of Internal Affairs for 2020-2022, a corruption prevention system was created in DSUIA, and regulatory and organizational acts were adopted to implement mechanisms of transparency and integrity and eliminate (minimize) of corruption risks in DSUIA activities.

1. Purpose and scope of application. Responsibility

1. The purpose of the program is:

ensuring the functioning of an effective system of preventing and countering corruption, compliance of the activities of DSUIA, its structural and separate divisions with the requirements of anti-corruption legislation, considering existing practices;

further implementation of mechanisms of transparency, integrity, reduction of corruption risks in the activities of DSUIA, and increasing the level of public trust; implementation of a set of measures (rules, standards, and procedures) to prevent, detect, and counter corruption in the activities of DSUIA.

Measures to prevent, identify, eliminate, or minimize corruption risks are recognized as a priority in the activities of DSUIA.

2. The scope of the program is:

the program is mandatory for the rector, employees, and persons undergoing training at DSUIA;

the program is mandatory for all structural subdivisions of DSUIA.

The program is used in all spheres of official activity of DSUIA, including relations with state authorities, local self-government bodies, other legal entities, and individuals.

Regulations regarding the mandatory compliance and implementation of the program are included in the rules of the internal procedure of DSUIA, provisions on structural subdivisions, all labor agreements, including contracts, and job instructions.

The program is approved by order of the rector.

The text of this Program is available for permanent public access on the official web portal of DSUIA in the “Countering Corruption” section (<http://dduvs.in.ua>).

3. For violations of the provisions of the program, measures of disciplinary responsibility shall be applied to the employees of DSUIA in accordance with the legislation, the rules of the internal labor regulations of the university, and the provisions of labor contracts.

Within five working days from the date of signing the administrative document on imposing a disciplinary penalty on a person or canceling the administrative document on imposing a disciplinary penalty for the commission of a corruption or corruption-related offense, the Department of Personnel Support of DSUIA must send a certified paper copy to the National Agency for the Prevention of Corruption the order of the rector of DSUIA 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 for the purpose of entering information on the imposition of a disciplinary penalty to the Unified State Register of persons who have committed corruption or corruption-related offenses.

Simultaneously with sending a notification to the National Agency for the Prevention of Corruption, a corresponding notification is sent to the Department of Corruption Prevention of the Ministry of Internal Affairs.

The rector of DSUIA ensures that measures are taken for the commission of a corruption or corruption-related offense.

2. Responsible leadership, business reputation, and integrity

The rector and heads of structural divisions undertake the following:

- 1) as a personal example of ethical behavior, form employees with zero tolerance for corruption, which is the basis of the business culture, everyday business practices, and business reputation of DSUIA;
- 2) demonstrate leadership and responsibility in relation to:
 - compliance with anti-corruption legislation;
 - ensuring the proper implementation, effective functioning, periodic analysis, timely revision, and improvement of the system of prevention and counteraction of corruption in DSUIA to properly respond to corruption risks in its activities;
 - spread of a culture of zero tolerance for corruption in all spheres of activity of DSUIA;
 - encouraging employees to demonstrate leadership in preventing and countering corruption within their powers;
 - directing employees to support the anti-corruption policy of DSUIA and their personal contribution to the effectiveness of the system for preventing and countering corruption;
 - informing about the policy of preventing and countering corruption both within DSUIA and in relations with state authorities, local self-government bodies, other legal entities, and individuals;
 - ensuring, in accordance with the Law of Ukraine “On Prevention of Corruption,” the conditions for reporting information on possible facts of corruption or corruption-related offenses and other violations of the Law of Ukraine “On Prevention of Corruption”;
 - compliance with the rights and guarantees of protection of whistleblowers provided for by the Law of Ukraine “On Prevention of Corruption”;
 - timely and appropriate response in accordance with the legislation to the facts of the commission (possible commission) of corruption or corruption-related offenses by the employees of DSUIA.

3. Norms of professional ethics

The rector, heads of structural units, the Commissioner for Anti-Corruption Policy (hereinafter the Commissioner), and employees of DSUIA during the performance of their official duties:

- strictly adhere to generally recognized ethical norms of behavior and requirements of the Code of Ethics of Dnipropetrovsk State University of Internal Affairs;
- are tolerant and respectful of other people’s political views, ideologies, and religious beliefs;

act regardless of personal interests, personal attitude towards any person, their political, ideological, religious, or other personal views or beliefs;

do not disclose or use confidential information that has become known to them when performing their official duties, including within a year after dismissal, except for cases established by law;

refrain from clearly criminal actions, decisions, or orders and take measures to cancel such decisions or orders.

Heads of structural subdivisions, Commissioner, and employees may not be fired or forced to fire, brought to disciplinary liability, or subjected to other negative measures of influence or the threat of such measures of influence on the part of the management of DSUIA in connection with the refusal to implement decisions or orders that are clearly criminal.

4. Principles of anti-corruption policy and strategic priorities

1. The program is based on the following principles:

the rule of law: the formation of intolerance to corruption; the establishment of a culture of integrity;

legality: conformity of the anti-corruption measures of the Constitution of Ukraine, the legislation of Ukraine in the field of prevention of corruption, and other normative legal acts;

transparency: openness and publicity of the corruption risk assessment process; determination of measures to influence corruption risks;

inclusiveness: ensuring the participation of the public and employees in the formation of anti-corruption standards and procedures;

adaptability: considering the sphere of activity of DSUIA and determining measures in accordance with its powers and functions;

objectivity and impartiality: considering public interests regarding the improvement of the created internal organizational system for the prevention and detection of corruption to achieve the goal of the program;

justice: ensuring the inevitability of legal responsibility for corruption and corruption-related offenses;

efficiency: timely implementation of appropriate procedures that will minimize the relevant corruption risks.

2. The principles of anti-corruption policy in DSUIA are implemented through tasks and measures in the following priority areas:

ensuring a systematic approach to preventing and countering corruption;

implementation of anti-corruption policy in personnel management, forming a negative attitude towards corruption;

implementation of measures to comply with the requirements of financial control, prevention, and settlement of conflicts of interest;

prevention of corruption in the field of public procurement;

ensuring compliance by the employees of DSUIA with the requirements and restrictions established by the Law of Ukraine “On Prevention of Corruption,” preventing violations of ethical norms, committing acts that can undermine the authority of DSUIA, and negatively affect the employee’s reputation;

organization of work with reports of violations of anti-corruption legislation;

cooperation with the public and international organizations regarding the implementation of anti-corruption measures.

5. Anti-corruption requirements, restrictions, and prohibitions

The rector, heads of structural units, Commissioner, and employees must comply with:

1) requirements for:

unconditional execution of the program;

timeliness of submission of declarations by persons authorized to perform the functions of the state or local self-government and additional measures of financial control (regarding persons who are the subjects of the declaration);

prevention and settlement of conflicts of interest;

prevention of receiving an unlawful benefit or an illegal gift;

immediate notification of the commission of a corruption or corruption-related offense in accordance with the procedure established by current legislation;

provision of conditions for receiving and considering reports of violations of the requirements of the Law of Ukraine “On Prevention of Corruption” by another person, in particular through a special telephone line, e-mail of the Commissioner, the official website of DSUIA, and means of electronic communication (messengers, chatbots).

ensuring the conditions for conducting an official investigation of a person who has committed a corruption or corruption-related offense;

transparency and access to information, except for cases provided by law;

non-disclosure of information about the whistleblower, his relatives, or information that can identify a person as a whistleblower or his relatives;

2) restrictions on:

using official powers or one’s official position for personal purposes or in the interests of third parties;

receiving gifts;

combination with other types of activities (for a certain category of people);

joint work of relatives (for a certain category of people);

3) prohibitions regarding:

participation in other paid or entrepreneurial activities, unless otherwise provided by the Constitution or laws of Ukraine (for a certain category of persons);

offers, promises, or giving (directly or through a third party), accepting an offer, promise, or receiving an improper benefit or gifts for committing or not committing any actions or omissions using the power, official position, or authority granted to them;

using one’s official powers or one’s position and related opportunities for the purpose of obtaining an unlawful benefit for oneself or other persons;

taking actions and making decisions in conditions of a real conflict of interest;
denial of information to individuals or legal entities, the provision of which is provided for by law, as well as the provision of untimely, unreliable, or incomplete information;

use of any property of DSUIA or its funds for private interests;

to be an intermediary or to personally make any cash or non-cash payments or settlements with counterparties of DSUIA or other natural or legal persons, if such payments or settlements are not provided for by legislation or concluded transactions of DSUIA;

committing any actions that directly or indirectly incite other employees to violate the requirements of the Law of Ukraine “On Prevention of Corruption” or this Program;

giving and receiving gifts in violation of the requirements of the Law of Ukraine “On Prevention of Corruption”;

disclosure or use in another way within a year after dismissal from DSUIA in their own interests, including confidential information that became known to them when performing their powers, except for cases established by law.

6. Prevention and settlement of conflicts of interest

DSUIA strives to ensure that the conflict of interests does not adversely impact its interests by preventing, identifying, and resolving it, including in connection with the presence of enterprises or corporate rights in the person.

DSUIA prevents and resolves conflicts of interest based on the following principles:

- 1) obligation to inform employees about situations that have signs of a conflict of interest;
- 2) prevention of conflicts of interest;
- 3) an individual approach when considering and evaluating each individual case that has signs of a conflict of interest.

Employees of DSUIA are obliged, no later than the next working day from the day when they learned or should have learned about the existence of a real or potential conflict of interest, to notify the rector, direct manager, and the Commissioner in writing not to take actions or make decisions in conditions of a real or potential conflict of interest and to take measures to resolve the actual or potential conflict of interest.

In case of a real or potential conflict of interests with the rector, he shall notify the Commissioner and the Minister of Internal Affairs of Ukraine in writing.

In case of a real or potential conflict of interest with the Commissioner, he shall notify the rector in writing.

The rector, within two working days after receiving a notification about the existence of a real or potential conflict of interest in a person subordinate to him, in accordance with the Law of Ukraine “On Prevention of Corruption” and considering the recommendations of the Commissioner, decides on the way to resolve the conflict of interest, for which he notifies the employee.

Employees of DSUIA who are police officers, if they have enterprises and corporate rights, are obliged, within 60 days after being appointed (elected) to a position or receiving such rights, to hand them over to another person in accordance with the procedure established by the Law of Ukraine “On Prevention corruption”, and other laws. It is forbidden to transfer the enterprises and corporate rights belonging to them to the management in favor of family members.

7. Rights and responsibilities of the rector, heads of structural divisions, and other employees

1. The rector, heads of structural divisions, and employees have the right:
 - to provide suggestions for improving this program;
 - apply to the Commissioner for consultations and clarifications regarding the implementation of this program, other internal documents of DSUIA regarding the prevention of corruption, and anti-corruption legislation;
 - receive recommendations from the Commissioner regarding further actions if planned actions or decisions (deeds) may be a source of corruption risks.
2. The rector, heads of structural divisions, and employees are obliged to:
 - comply with the requirements of the Law of Ukraine “On Prevention of Corruption,” this program, internal documents adopted for its implementation, as well as ensure the implementation of this program;
 - perform their official duties considering the legal interests of DSUIA;
 - immediately inform the Commissioner about cases of violation of the requirements of this Program (or cases of incitement to such actions), commission of corruption or corruption-related offenses, other violations of the Law of Ukraine “On Prevention of Corruption” by the management of DSUIA, heads of structural divisions, and its employees;
 - to inform urgently in the established manner about the occurrence of a real or potential conflict of interests; take measures to prevent and resolve real or potential conflicts of interest; not to take actions and not to make decisions in conditions of a real conflict of interests;

refrain from behavior that can be regarded as a readiness to commit a corruption or corruption-related offense related to the activities of DSUIA;
consider the recommendations of the commissioner.

8. Legal status, areas of activity, and guarantees of independence of the Commissioner for Anti-Corruption Policy

1. The legal status of the Commissioner is determined by the Law of Ukraine “On Prevention of Corruption” and the Standard Regulation on the Commissioner, which is approved by the National Agency for the Prevention of Corruption.

The Commissioner is appointed by the rector of the university to a separate position in accordance with the labor legislation.

In the event of the Commissioner's absence due to temporary incapacity for work, being on vacation, or other reasons, his duties are performed by another person (with his consent), as determined by the rector.

The person who cannot be appointed to the Commissioner:

- 1) has an outstanding or not expunged criminal record in accordance with the procedure established by law;
- 2) recognized as incompetent or whose legal capacity is limited by a court decision; dismissed from positions in state bodies, authorities of the Autonomous Republic of Crimea, or local self-government bodies for violation of oath or in connection with the commission of a corruption offense or an offense related to corruption within three years from the date of such dismissal.

Incompatible with the activity of the Commissioner is work in the positions specified in clause 1 of the first part of Article 3 of the Law of Ukraine “On Prevention of Corruption,” as well as any other activity that creates a real or potential conflict of interests with the activity of DSUIA.

The Commissioner may be dismissed from his position in accordance with the procedure established by law.

2. The main directions of activity of the Commissioner are:
 - ensuring the awareness of DSUIA employees regarding compliance with legislation on corruption prevention (training, methodical, and advisory assistance);
 - organization and control over the implementation of measures to prevent corruption in DSUIA;
 - organization of work on the assessment of corruption risks in DSUIA and taking measures to eliminate them;
 - prevention of conflict of interests and prevention of violation of anti-corruption prohibitions and restrictions in DSUIA;
 - consideration of reports on violations of the requirements of anti-corruption legislation at DSUIA;

ensuring the implementation of financial control requirements (declaration) at DSUIA;

exercise of powers in the sphere of protection of whistleblowers;

verification of counterparties (business partners) of DSUIA;

approval of projects or orders (assignments) on the main activity, administrative and economic issues, personnel issues (personnel);

monitoring the implementation of the program and preparing a report on the results of its implementation;

other powers provided by law.

3. Guarantees of the independence of the Commissioner:

Interference in the activity of the Commissioner by the rector, heads of structural units, employees of DSUIA, as well as other persons, is not allowed.

Intervention should be understood as:

refusal to provide the Commissioner with information, documents, or access to information and documents, which the Commissioner has the right to receive;

any influence on decision-making and actions by the Commissioner, which is carried out outside the powers of the management body or person exerting influence, provided for by legislation as well as regulatory documents regulating the activities of DSUIA;

actions or inactions that cause restriction or violation of the Commissioner's rights;

actions or inactions that prevent the fulfillment of official duties by the Commissioner;

entrusting the Commissioner with duties, giving instructions on issues that do not belong to or go beyond his authority, as defined by the Law of Ukraine "On Prevention of Corruption," this program, the Regulations on the Commissioner, and limiting his performance of official duties.

1) The Commissioner may not be dismissed or forced to resign, brought to disciplinary liability, or subjected to other negative measures of influence by the head of DSUIA (transfer, certification, change of working conditions, refusal to be appointed to another position, salary reduction, etc.) or the threat of such influence measures in connection with the implementation of anti-corruption measures, detection and reporting of possible facts of corruption or corruption-related offenses, or other violations of the Law of Ukraine "On Prevention of Corruption."

2) The rector of DSUIA must comply with the guarantees of independence of the Commissioner:

ensures the independence of the Commissioner;

creates appropriate material and organizational working conditions for the Commissioner (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, means of communication, an electronic mailbox account), as well as sufficient resources to perform the tasks assigned to him;

contributes to the fulfillment by the Commissioner of the tasks stipulated by the Law of Ukraine "On Prevention of Corruption" and this Program;

at the request of the Commissioner, ensures the possibility of providing

information and documents necessary for the fulfillment of the duties assigned to him, facilitates the conduct of inspections and internal investigations, and ensures the involvement of employees and resources for the Commissioner to perform his duties;
responds to written and oral appeals, suggestions, and recommendations of the Commissioner.

9. Management of corruption risks

1. In order to effectively prevent corruption in its activities, DSUIA creates a risk management system, which provides for the regular assessment of corruption risks that may be affected by the activities of DSUIA, taking necessary and sufficient measures to eliminate or minimize them, their further monitoring and control, as well as updating the existing anti-corruption measures in accordance with changes in the internal and external environment of DSUIA.

The assessment of corruption risks at DSUIA is carried out in accordance with the requirements of the Methodology of Corruption Risk Management, approved by the order of the National Agency for the Prevention of Corruption dated December 28, 2021 № 830/21, registered in the Ministry of Justice of Ukraine on February 17, 2022 under № 219/37555.

2. Information on the chosen format of corruption risk assessment

In order to establish the probability of committing corruption and corruption-related offenses by employees of DSUIA, to establish the causes, conditions, and consequences of the possible commission of such offenses, as well as to analyze the effectiveness of existing control measures aimed at preventing the implementation of corruption risks, it is accepted to conduct an assessment of corruption risks in the format of a self-assessment according to the order of DSUIA dated November 10, 2022 № 849, which was published on the official website (<https://dduvs.in.ua/anticorruption>).

3. Information on the Working Group, preparation, and organization activities.

In accordance with the order of DSUIA of December 12, 2022 № 926, a working group for assessing corruption risks was created, and the regulations on the working group and its personnel were approved.

The working group drew up a plan for assessing corruption risks, which defines the stages of the work group's activities, considering the functions of DSUIA, internal and external stakeholders, and other factors of DSUIA environment.

For the purpose of researching the environment of DSUIA and determining the functions and processes vulnerable to corruption by the working group:

the results of the assessment of corruption risks, the measures to influence them, and the evaluation of the effectiveness of their implementation are analyzed;

an anonymous survey (questionnaire) of external and internal interested parties is conducted, and the information obtained is analyzed and summarized;

the results of audits and inspections are analyzed, and information is summarized about possible facts of corruption and corruption-related offenses, functions, and processes with which such facts are connected;

materials from disciplinary proceedings and official investigations are analyzed;

information contained in open information systems, registers, and databases, and information from the media, social networks, and other open sources of information about possible facts of corruption or corruption-related offenses by employees of DSUIA are analyzed; Analytical materials of the National Agency for the Prevention of Corruption on the analysis of corruption risks are being studied.

Based on the collected information, the Working Group identified corruption risks, the register of which is an appendix to the program (Appendix 1). Also, the Program defines the tasks and measures for the implementation of the anti-corruption policy principles at DSUIA (Appendix 2).

10. Register of risks

The risk register (Appendix 1) must contain:

functions (processes) of DSUIA, in which corruption risks are identified, their sources, the level of corruption risk, measures to influence the corruption risk, deadlines for their implementation, the list of responsible actors, as well as the necessary resources and indicators of the implementation of measures to influence the corruption risk (expected results).

11. Training, information dissemination activities regarding anti-corruption programs

In order to form an appropriate level of anti-corruption culture, the Commissioner organizes the familiarization of the employees of DSUIA with the provisions of the Law of Ukraine “On Prevention of Corruption,” the program, normative-legal and organizational-administrative acts that regulate the issue of prevention and counteraction of corruption, and the training of employees on issues of prevention and counteraction of corruption.

The topics of training events on the prevention and countering of corruption and the target audience are determined by the Commissioner of DSUIA in Appendix 2 to the program. The forms of educational events are lectures, trainings, and seminars. Educational activities can be conducted face-to-face or remotely. Within the limits of his powers, the Commissioner carries out measures to disseminate information about anti-corruption programs by conducting consultative and explanatory work among the employees of DSUIA on the issues of their compliance with the requirements of anti-corruption legislation, in particular, filling out electronic declarations, responsibility for violating the requirements of financial control, preventing the occurrence of conflicts of interest, liability for other corruption or corruption-related offenses, as well as violations of other requirements of the Law of Ukraine “On Prevention of

Corruption”.

Anti-corruption information can be disseminated by:
placement on the official website of DSUIA (<https://dduvs.in.ua/anticorruption>)
and other information resources;
conducting webinars;
design of the information stands;
email newsletters;
holding conferences, forums, round tables, and panel discussions;
placement of press releases;
participation of the rector, projectors, the Commissioner, and other designated persons in public events organized by representatives of the media, the public, other external interested parties, etc.;

conducting consultations.

In case of questions regarding the implementation of the program, the employees of DSUIA can contact the Commissioner for advice and/or clarification regarding the implementation of the program requirements.

The Commissioner shall provide clarification or consultation within a reasonable period of time, but not more than 10 days from the date of receipt of the appeal. If it is not possible to provide an explanation or consultation within the specified period, the Commissioner may extend the period for consideration of the appeal, which must be notified to the person who requested clarification or consultation. The total period of consideration of the appeal cannot exceed 30 days from the date of its receipt by the Commissioner.

12. Consideration of reports on possible violations of the Law of Ukraine “On prevention of corruption”. Whistleblower protection rights and guarantees

The rector, the Commissioner, within the scope of his powers, provides whistleblowers with the conditions for reporting possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine “On Prevention of Corruption,” consideration of such reports in the manner determined by this Law, other legislative acts, as well as compliance with the rights and guarantees of protection of whistleblowers.

The whistleblower has the rights and guarantees of protection provided for by the Law of Ukraine “On Prevention of Corruption,” in particular:

provide evidence to support your message; receive confirmation of acceptance and registration of the message; the right to privacy;

receive information about the status and results of the review, verification, and/or investigation of information based on the facts of the information reported by him;

for exemption from legal responsibility for making a notification and distributing the information specified in the notification, despite the possible violation of one's labor, civil, or other duties or obligations by such a notification;

for exemption from civil liability for property and/or moral damage caused as a

result of reporting, except in the case of knowingly false reporting.

The rights of a whistleblower arise from the moment of making a 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,” which can be verified.

The whistleblower is guaranteed the protection of his rights in the order and under the conditions established in the Law of Ukraine “On Prevention of Corruption”.

It is forbidden to disclose information about the identity of the whistleblower, his relatives, or other data that can identify the identity of the whistleblower, his relatives, to third parties who are not involved in the review, verification, and/or investigation of the facts reported by him, as well as to persons whose actions or inaction apply to the facts reported by him, except for cases established by law.

Access to information about whistleblowers is limited to the rector, authorized and designated by the rector, who is involved in the process of receiving and considering reports at DSUIA.

In case of a leak of confidential information about the whistleblower, the Commissioner, the rector, at the request of such a person or on his own initiative, must immediately take all measures to avoid negative consequences for the whistleblower associated with such disclosure.

Intimidation, humiliation, or persecution of whistleblowers, application of other negative measures of influence on them (refusal of employment; dismissal or forced dismissal; disciplinary action; other measures, including formally legitimate decisions and actions of a selective nature, in particular, that are not applied to other employees in similar situations and/or have not been applied to the employee in similar situations before) or threats to apply such influence measures.

The whistleblower may not be fired or forced to fire, subject to disciplinary action, subjected to other negative measures of influence, or threatened with such measures of influence in connection with the report.

The rights and guarantees of protection for whistleblowers extend to relatives of the whistleblower.

13. Business Hospitality Policy and Procedures

The rector, heads of structural subdivisions, and employees of DSUIA are obliged to refrain from offering business hospitality or gifts if such business hospitality or gifts can be considered an inducement or readiness to commit a corruption offense related to the activities of DSUIA.

Giving and receiving gifts within the framework of establishing or maintaining business relations or to achieve another goal of DSUIA activity, is allowed if it meets the following criteria:

- is not intended to influence the objectivity of any decision regarding the conclusion of transactions, the provision or receipt of services, information, or any other benefits for DSUIA;

- is not a hidden, undue advantage;

- corresponds to generally accepted ideas about hospitality;

- the value does not exceed the limits established by law (the value of such gifts does not exceed one subsistence minimum for able-bodied persons, established on the day of acceptance of the gift, once, and the total value of such gifts received from one person (or group of persons) during the year does not exceed two subsistence minimums, established for an able-bodied person on January 1 of the year in which gifts are accepted);

- the disclosure of the gift or business hospitality will not create a risk for the business reputation of DSUIA or the person who received the gift or business hospitality;

- it is not allowed to give and receive gifts in the form of cash (cash or non-cash) or cash equivalents (gift cards or gift vouchers).

In case of doubt regarding the acceptability of a gift or business hospitality, employees should contact the Commissioner for advice and/or clarification.

14. Interaction with business partners

DSUIA strives to cooperate with business partners who carry out their activities legally and ethically and with whom interaction does not carry corruption risks.

The verification of potential or existing business partners of DSUIA is carried out by an authorized person who has the right to conduct an analysis of such business partners and provide information about them to the rector or another person designated by the rector. Other structural subdivisions of DSUIA may also be involved in the inspection.

The procedure for checking business partners is determined in the internal documents of DSUIA, which are developed by the Commissioner and approved by the rector.

The verification of business partners of DSUIA is carried out for the purpose of:

- 1) checking the business reputation of a business partner for corruption tolerance;
- 2) identification of possible corruption risks in connection with the conclusion (execution) of the deed;
- 3) minimizing the probability of committing or verifying possible facts of committing a corruption or corruption-related offense or other violation of anti-corruption legislation during the establishment and/or implementation of legal relations with a business partner.

In case of justified doubts about the business reputation of a business partner, which may lead to corruption risks, DSUIA reserves the right to refuse the business partner's establishment or continuation of business relations, considering the requirements of the law, in particular the Law of Ukraine "On Public Procurement."

Anti-corruption clauses may be included in the agreements (contracts) concluded by DSUIA with business partners. The purpose of the anti-corruption clause is to provide DSUIA with guarantees of compliance with the anti-corruption legislation that applies to it and to obtain similar guarantees from the business partner.

Editions of anti-corruption provisions are developed by the Commissioner, considering the spheres of activity.

15. Conducting internal checks and investigations

In case of notification of possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine "On Prevention of Corruption" or signs of a corruption or corruption-related offense, other violations of anti-corruption legislation, or this Program being detected by an employee of DSUIA, the Commissioner or another person designated by the rector carries out the relevant inspection or investigation in accordance with the procedure provided for by the Law of Ukraine "On Prevention of Corruption" and other legislative acts.

16. Monitoring, evaluation of implementation and review of the Program

1. The procedure for monitoring and implementing the Program and its periodicity. Monitoring of the implementation of the Program is carried out by the Commissioner.

Heads of structural subdivisions provide the commissioner with information on the state of implementation of the measures provided for in Appendices 1 and 2 to the program on a quarterly basis, and in cases of non-implementation or late implementation of certain measures, they inform the commissioner of the reasons that led to this.

Employees of DSUIA, as well as counterparties of DSUIA, can inform the commissioner about detected signs of violations of this program, facts of incitement of employees, the rector of DSUIA to commit corruption or corruption-related violations, and other violations of the Law of Ukraine "On Prevention of Corruption."

For violations of the provisions of this Program, disciplinary measures are applied to employees in accordance with the law.

2. Evaluation of the implementation of the Program, indicators according to which it is implemented.

The evaluation of the implementation of measures provided for by the Program is determined according to the following criteria:

“Completed” or “Continuously implemented”: if the planned event in the reporting period has been implemented or is constantly being implemented during the reporting period;

“In the stage of implementation” - if the implementation of the measure has been started in the reporting period;

“Not implemented” - in case the implementation of the measure has not started in the reporting period.

If the implementation of the measure is conditioned by a certain event, the period of performance of the measure begins from the moment of the occurrence of this event.

17.Changes and additions to the Program

The program can be viewed in the following cases:

in the case of the adoption of legislative acts in the field of corruption prevention; according to the results of changes to the anti-corruption program of the Ministry of Internal Affairs;

if in the process of implementation of the measures provided for by the Program, their insufficient efficiency is revealed or new corruption risks are revealed based on the results of the research (analysis) of the internal/external environment of DSUIA;

in case of an assessment of corruption risks in the activities of DSUIA. The initiator of changes to this Program can be authorized, rector, heads of structural units of the National Academy of Sciences.

Proposals for modifying this Program are submitted to the commissioner, who studies and systematizes them.

The Commissioner provides the rector with generalized proposals for making changes to this Program and his recommendations for their consideration or rejection.

In the case of approval of proposals for modifying this Program, the rector, by his order, approves the corresponding changes, which are an integral part of this Program.

Commissioner for Anti-Corruption Policy

Ruslan Lupyr