

## **ADDRESS OF THE GENERAL DIRECTOR OF SE IA BORYSPIL**



Dear colleagues!

Our Company begins with the values we treasure the most. These are: hospitality, honesty, sincerity, respect for people. Our values serve as the guarantee of ensuring high moral standards in relations with our partners, consumers of our services, suppliers, authorities, regulators and the like. Our commitment to high moral standards and ethical conduct is particularly important in identifying and countering corruption. Our attitude toward corruption is unequivocal: we adhere to the principle of «zero tolerance». It is essential for us that our employees and people who represent the interests of our Company are clearly aware of their responsibility and accept our values. Guided by our values and acting honestly and in good faith, we make SE IA «Boryspil» the Company to be proud of. Thank you for being with me in this endeavour.

**Pavlo Riabikin,  
Director General**

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## I. Why is this policy important for our Company and for each of you?

The Boryspil International Airport is the largest and most efficient airport in Ukraine, ranking among the top in Eastern Europe. We have managed to become the main «air gate» of our country, a reliable bridge connecting Ukraine with other countries around the globe. Every day thousands of people who trust us come to the airport and consume our services. The travelers are confident to receive in our airport safe and reliable services and comfort. Our success depends on maintaining that trust. Therefore, we do our job, observing the norms of business conduct and ethics to earn and justify the trust of people.

- ✓ Doing business, we develop infrastructure, attract new airlines, improve the quality of service.
- ✓ We are out there to ensure that the country's air gate creates the first-hand positive impression of our country.
- ✓ Our policy is to counter laundering and terrorist financing processes.
- ✓ We do not support criminals, terrorists or governments, individuals or entities sanctioned for such activities.
- ✓ We are all responsible for the timely detection and reporting of any suspicious activity.
- ✓ We do not tolerate bribery and corruption.
- ✓ We believe that the only way of doing business is to do it honestly and in good faith.
- ✓ We strive for equal and fair competition.
- ✓ Our honesty is essential to ensure that the SE IA «Boryspil» remains a respected, trusted Company whom people trust and with whom they are willing to business with, a place inspiring pride among employees and the willingness to work with maximum efficiency, constantly improving the quality of services.
- ✓ We have created a fairly high level of trust in us and our services, as well as in each other in the team, but we must constantly work to maintain it at the proper level.
- ✓ We try to do this every day, acting in conformity with the highest ethical standards. Our anti-Corruption program and Code of Ethics reflect these standards and encourage us to conduct our business with integrity.

The basic principle of the Company management is the responsibility for how we act and manage. We appreciate and encourage the creation of an open environment in the team, where employees feel comfortable asking questions and expressing doubts, honestly reporting all known shortcomings. Thus, each employee makes a significant contribution to our common collective responsibility for the protection of the reputation of SE IA «Boryspil».

For these reasons, we ask each employee to familiarise themselves with the requirements of the Anti-corruption policy and always comply with them. Thank you for your help in promoting a strong ethical culture and protecting our trusted brand.



## II. Persons covered by the anti-corruption policy and its main components

Anti-corruption policy is a system of measures applied at the Company to prevent workers committing corruption or related to corruption offences, as well as with the purpose of ensuring compliance with the requirements of anti-corruption legislation and anti-corruption program.

Our Anti-corruption policy reflects our commitment to excellence and confirms our honesty, openness and commitment to high ethical standards. Since we are responsible for our actions and decisions at all levels, the requirements of the Anti-corruption policy are the same and apply equally to all those who work in SE IA «Boryspil», perform official duties or provide services at the airport or on behalf: of the management and employees of our Company, personnel handling companies, airlines, government control agencies, companies-suppliers of goods, works and services.

It is your responsibility to ensure that you comply with this policy. The Company applies the «zero tolerance» principle to violations of the requirements of this Policy.

All employees of the Company are obliged to share our values, adhere to ethical standards of behaviour and take appropriate measures to prevent any violations of the requirements of this policy. The penalty for wilful violation of this Policy or failure to report violations of which You are aware will be reprimand or dismissal.

In cases provided for by law, information on violations may also be transmitted to law enforcement agencies, which will result in the initiation of administrative or criminal proceedings against the perpetrator.

### **Main components of Anti-corruption policy:**

- 1) interest and personal example of top management in the implementation of the policy;
- 2) Anti-corruption program and the person responsible for its implementation (Commissioner for prevention of corruption, hereinafter-the Commissioner);
- 3) clear and accessible requirements of regulatory and technological documents that restrict and prevent the Commission of corruption and corruption-related offenses;
- 4) corruption risk assessment, verification of internal official documents and business partners;
- 5) detailed procedures for individual risks;

- 6) conflict of interest prevention and resolution;
- 7) representation by officials of SE IA «Boryspil» declarations of persons authorised to perform state functions or local self-government, their verification by the Commissioner and ensuring, when appropriate, informing the National Agency for prevention of corruption, in accordance with the requirements of the law of Ukraine "On prevention of corruption»;
- 8) detection of signs of preparation/commission of corruption or corruption-related offenses and protection of whistle-blowers;
- 9) management response to employees' violation of anti-corruption legislation by bringing the perpetrators to disciplinary responsibility and informing the National Agency for the prevention of corruption in cases defined by the Law of Ukraine «On prevention of corruption».

### III. How to ensure compliance with anti-corruption policy

To ensure proper compliance with the provisions of the anti-corruption policy of the Company, all employees of the company must know the requirements of the current anti-corruption legislation and regulations of the Company aimed at combating corruption and strictly comply with them, know and perform their duties in this area.

Employees must attend training programs that the Company conducts to ensure that they are aware of the provisions of the current legislation on combating corruption and bribery. Such training programs are developed by the Commissioner taking into account specific corruption risks that are relevant to the Company. In addition, employees are required to consult the explanations and reference materials that are sent to them by the Commissioner in electronic format.

## IV. The main duties of each employee in the field of anti-corruption:

- ☑ You must be responsible for your actions, adhere to the Anti-corruption policy of the Company, the requirements of anti-corruption legislation, the rules of ethical behaviour, be an example and role model for other employees.
- ☑ Under no circumstances do not take or offer bribes.

**Bribery** is a crime punishable by a substantial term of imprisonment. A bribe is the direct or indirect giving or offering of any value or benefit to any person for the purpose of inducing the improper performance of its duties or the Commission of improper acts. A bribe may be financial or other in nature and may include the provision or receipt of money, loans, contributions or donations, travel, employment offers, refunds, discounts, goods, services or anything else of value. In some circumstances, gifts or entertainment or recreation services may also be considered forms of bribery. A bribe may also be used in the form of a «reward» and paid after improper performance of a duty or obligation. Bribery also includes soliciting or accepting any value or benefit from any person in exchange for giving that person an improper benefit. You shall not take bribes. Also, remember that You will never be punished for refusing to give bribes. Any delays or financial losses caused by your refusal to pay a bribe will not have any negative impact on the results of the evaluation of the effectiveness of Your work. However, one of the criteria for a proper process of evaluating employee performance is prior planning. You should always plan your work in advance to avoid a situation where a bribe is needed to speed up the process of resolving a certain issue.

### **To avoid such situations, You should:**

- work, have information about the requirements for permits, the needs of the Company and the timing of the documents;
- solve problems in advance, anticipating enough time to obtain the relevant documentation;
- establish friendly business relationships with government agencies and institutions;
- make it clear that the Company cannot and does not pay bribes in the context of its business activities;
- prepare for inspections in advance, know and comply with the requirements of the legislation, promptly eliminate deficiencies;





- if You suspect that the inspector may demand a bribe from you, You should invite other persons to accompany You during the inspection, as the presence of others may prevent the demand for a bribe from being made.
- have a good knowledge of the organisational structure and powers of the regulatory authorities, in order to be prepared to turn to a senior civil servant in order to solve the problem;
- collaborate with others in Your industry who are confronted with similar issues or apply similar ethical standards.
- ☑ Be especially careful when interacting with government officials. Observe the restrictions regarding gifts.

You should never accept or give gifts or other material benefits that may affect Your or anyone else's ability to make objective decisions. Make your contribution to help us maintain our good reputation - do not use Your position in the Company for personal gain.

It is forbidden directly or through other persons to demand, ask, receive gifts for themselves or loved ones from legal entities or individuals:

- 1) in connection with the implementation of professional activities related to the performance of the functions of the state or local self-government;
- 2) if the giver is in Your submission.

In General, all gifts that You accept must comply with generally accepted notions of hospitality. The cost of such gifts shall not exceed one subsistence minimum for able-

bodied persons established on the day of acceptance of the gift, once, and the total cost of such gifts received from one person (group of persons) during the year shall not exceed two subsistence minimums established for able-bodied person on January 1 of that year in which the gifts are accepted.



- ✓ You must avoid conflicts of interest, bias, or favouritism. You should immediately inform the Commissioner of a potential or actual conflict of interest and independently propose and take measures to eliminate it.

**A conflict of interest** is a contradiction between a private (personal) interest and official authority. Thus under private interests it is necessary to understand any property or non-property interests of the person, including caused personal, family, friendly or other off-duty relations with physical persons or legal entities, including those which arise in connection with membership or activity in public, religious or other organisations.

It is the presence or absence of a person's private interest in solving a certain issue in most cases will be an indicator that will indicate a conflict of interest in the person. In addition, a conflict of interest occurs when it comes to the contradiction of the private interest of a person close to You with Your official powers.

The presence of a conflict of interest may adversely affect the objectivity or impartiality of decision-making, as well as the commission or non-commission of actions during the performance of the official powers granted to the person. The presence of a conflict of interest does not necessarily lead to corruption, but significantly increases the risk of committing acts of corruption and is in fact their prerequisite. On its own terms, the concealment of a person's private interest is already regarded as a violation of official discipline and requires the adoption of appropriate measures to prevent corruption.

- ✓ The Commissioner is to be advised of all known facts of corruption. Should the employee volunteer the information, the Company will protect this employee from any punitive actions he/she may be a target of.
- ✓ The work at the Company and the relations among the employees must shall be built on the basis of high moral and ethical standards.

The enterprise must create a comfortable working environment and instill culture that encourages workers to work honestly, be guided by high principled and freely express their opinions. The employees must show respect for their colleagues and partners, exhibit behavior of high ethics, kindness and trust, create a culture of inclusion where everyone is treated with dignity and respect. Individual differences, experience and capabilities of each employee must be valued and respected.

Alcohol and drugs can impair Your ability to do your job and can put others at risk. Employees of SE IA «Boryspil» are prohibited to use, sell, own or be under the influence of alcohol, drugs or psychotropic substances on the territory of the Company or while working outside the Company. Prescription and over-the-counter medications are allowed if they are prescribed by your doctor and do interfere with your ability to perform your job in safe and secure way.

- ✓ It is necessary to respect and protect the privacy of employees, take measures to protect personal data and information.

Only authorised persons can access confidential information, and only for the business purposes. You may only access your own records. SE IA «Boryspil» commits to protect the personal information of the employees and partners. The enterprise has introduced and observes the confidentiality and non-disclosure policy. Employees of SE IA «Boryspil», who have access to the confidential information, shall process, store, transmit and use this information in conformity with the policy of the Company and the requirements of the current legislation on the personal data protection.

- ✓ The employees must take measures to protect the intellectual property of the Company, keep confidential the information that is a trade secret of the Company or is intended for administrative use.

Some of our most valuable assets are intangible. Information organises and combines our production processes. Our intellectual property is a critical asset to our business activity. Our information systems and our intellectual property may be subject to infringement, which creates certain security risks. By using our information systems and technologies, contribute to protection against viruses, data breaches and other risks.

**Never:**

- install unauthorised software, programs, or hardware;
- use unauthorised devices to access our network;
- access unauthorised websites;
- send passwords or access codes;
- open suspicious or unwanted email.

Also, remember that everything that you create, design or develop as part of your work in SE IA «Boryspil» is the property of our Company. Protect our intellectual property - never disclose the content of official documents to third parties without prior permission from the Company's management. Our responsibilities also include respecting the intellectual property rights of others.

While working in SE IA «Boryspil» You can have access to confidential business information or trade secrets of our Company or our partners or suppliers. Some information provides SE IA «Boryspil» competitive advantages and, conversely, can be harmful if it is made public without permission. We all have a duty to protect confidential information from unauthorised access and disclosure.

Remember that the Company depends on you and needs your help and appropriate measures to preserve our confidential business information. Help us to protect the assets of the Company. If you know or suspect that any of our assets have been lost, stolen or misused, report it immediately. As an employee of SE IA «Boryspil», You help to protect the Company and ensure its continued success, processing information in accordance with the established guidelines.

- ✓ Honour the brand of the Company, avoid careless public actions, statements and messages that can damage the business reputation of the Company.

**Our brand is our reputation.** We strive to ensure competence and consistency in public statements and communications in order to strengthen our brand and our reputation. Everything we say on behalf of SE IA «Boryspil» affects our reputation. Therefore, the one who speaks on behalf of the Company shall be duly entitled to do so. This will serve as a guarantee that all messages will contain accurate, correct, consistent with our brand information within the framework of current legislation. If a media representative asks You to provide a statement, comment or position on any topic, send it to the media relations and communications service, citing the fact that you are not authorised to make comments on behalf of the Company.

Social networks are widely used. Be careful and cautious about what you choose to share on the Internet. The use of social networks during working hours as the staff



of SE IA «Boryspil» according to our policy is allowed only for production purposes. Social media shall never be used in a way that violates any business policy, legal or ethical obligations. Discriminatory comments, harassment, threats of violence, or other inappropriate or illegal behaviour on social media will not be tolerated and may result in disciplinary action.

You have the right to participate in politics, but remember that your views and actions related to political affairs are Yours, not of SE IA «Boryspil». Do not use the Company resources, including working time, to engage in the political activities. Be moderate in your actions and statements.

- ☑ Observe the established rules of work with official documentation, to ensure the accuracy of the data that You make in official documents.

In SE IA «Boryspil» honesty determines everything we do. We strive to maintain documentation that accurately reflects our business activities. Each of us is responsible for identifying false information and reporting it to the Commissioner. The Company hopes that You keep the documentation properly and make it reliable and verified data in compliance with the applicable procedures for accounting of business transactions and financial reporting, internal control.

Keep records and information for a set period of time and handle documents that are no longer needed for production tasks with care.



## V. Ways to report corruption

If in doubt, You shall consult the Commissioner. If You have any doubts about the conduct in a particular situation or whether certain conduct may be considered inappropriate or contrary to the requirements of this policy, You shall always consult with the Commissioner before taking any action. If You are faced with an ethical dilemma or other problem, the anti-Corruption policy will provide You with information that will help You make the right decision. Contact the Commissioner for the prevention of corruption for assistance if You have any questions or need assistance. We rely on You, and at the same time we will fully promote that Your actions were honest, correct and professional as reputation of the Company depends on it.

If You discover any conduct by other employees that causes You concern or that You believe may constitute a violation of Company Policy, You must notify the Commissioner immediately. This will enable the Company to react to the relevant situation and correct it, and ideally before it develops into a violation of the law or put at risk the reputation of the Company. If You suspect any serious violations of this Policy, even if such violations involve the actions of senior executives, significant amounts of money or potentially have the characteristics of criminal offences, information about the relevant facts shall be immediately transmitted to the Commissioner.

The Commissioner for the prevention of corruption is an independent official who reports to the Commissioner of the unit in the Central office of the Ministry of infrastructure of Ukraine. In the exercise of his / her powers, he / she works closely with the National Agency for the prevention of corruption and, in cases specified by law, reports on the detection of violations that have signs of corruption or corruption-related actions.

We act decisively to do what is right. At the same time, we urge everyone to take an active position in situations where you are asked to do something that makes you feel uncomfortable, or you see or suspect activities that are contrary to our anti-Corruption policy – inform the Commissioner for the prevention of corruption.

- directly to the Commissioner for the prevention of corruption+38 (044) 281-77-98
- To your immediate or senior Manager;
- **on a confidential hotline +38 (044) 281-73-28.**

The confidential hotline provides an opportunity to share your questions, comments or reviews on-line or by phone 24 hours a day, seven days a week. You can report known facts anonymously. However, it shall be borne in mind that anonymous

communications are harder to investigate - identifying yourself You can speed up and ensure thorough consideration to resolve the issue. If you still want to remain anonymous, you can specify this at the time of the message. The law (article 53 of the law of Ukraine «On prevention of corruption») guarantees protection from prosecution of persons who report facts of corruption offenses (exposers).

The employee's indifference to the manifestations of corruption, failure to report the facts of corruption acts known to him is an indication that he does not share our values and is unable to work in a team. If such facts are revealed, the employee may be brought to disciplinary responsibility, up to dismissal.



## VI. Financial controls. Declaration of income and expenses

All employees of SE IA «Boryspil», who occupy senior positions and are endowed with organisational, administrative and economic functions, are the subjects of Declaration and, accordingly, are obliged to:

- ✓ annually till 1 April of the current year to submit by filling on the official website of National Agency for prevention of corruption the annual electronic Declaration for last year;
- ✓ on the day of dismissal to submit an electronic Declaration for the period not covered by the previously filed declarations;
- ✓ next year after the termination of activity to submit in accordance with the established procedure the Declaration for last year;
- ✓ the persons applying for employment of senior positions are obliged before appointment or election to the corresponding position to submit in accordance with the established procedure the Declaration for last year;
- ✓ In the case of significant changes in the property status, - a significant change in the property state is considered to receive income, acquisition of property for an amount that exceeds 50 times the subsistence minimum established for able-bodied persons on 1 January of the respective year within ten days of the receipt of income or of acquisition of property to notify in writing the National Agency for prevention of corruption by making public information on the official web site of the NAPC.

Within seven days after the submission of the Declaration, the subject of Declaration has the right to submit a corrected Declaration.

Violation by subject of avowal of anti-corruption law requirements relative to compulsory measures of financial control is the basis for its attraction to administrative or criminal liability. At the same time, the Company may apply disciplinary measures to such an employee. The subject of Declaration may be held liable for failure to submit, late submission of the Declaration, failure to notify or late notification of significant changes in the property status, in case of detection of false information in the Declaration. Bringing to responsibility does not release the subject of Declaration from the obligation to submit the relevant Declaration with reliable information.

The Commissioner controls over the timeliness of submission of declarations by subjects of declaring of the Company, monitors the submitted declarations for logical and arithmetic errors.



In case of violations, the Commissioner shall inform the National Agency for the prevention of corruption in writing within 10 days.

Employees of the Company can always apply to the Commissioner

for clarification and advice on the procedure for the implementation of statutory financial control measures. If desired, and provided that the employee has an electronic digital signature, the Declaration or notification of significant changes in the property status can be submitted to them from a specially equipped workstation in the Department for the prevention and detection of corruption.



## VII. Necessary checks when hiring employees and selecting contractors in economic relations

Corruption offences commitment by employees of the Company and its partners, suppliers, other individuals and legal entities that interact with the Company or represent its interests in the process of economic activity can damage the reputation of the Company and have negative legal consequences.

Therefore, any illegal actions of third parties interacting with the Company shall not be ignored. All actions suspected to be contrary to the requirements of this policy shall be immediately reported to the Commissioner.

Also, it is necessary to approach with special care to the assessment of future employees, as well as third parties with whom the Company plans to have economic relations.

In order to reduce corruption risks in SE IA «Boryspil» the decision to hire a person is made collectively on a competitive basis, according to the «Regulations on personnel management in SE IA»Boryspil». In this case, the person is not deprived of the right to appeal the decision of the collegial body in the manner prescribed by applicable law.

When hiring new employees or transferring employees within the Company to positions in the category of «Manager» and positions that are associated with the conclusion of the contract on full individual / collective financial responsibility, all candidates for these positions are personally interviewed in the Department for the prevention and detection of corruption.

It examines the candidate's previous work experience, his reputation, establishes the absence of compromising circumstances and the absence of circumstances that can create a potential conflict of interest related to the future duties of the candidate.

All employees of the Company must personally sign to read this policy and agree to comply with provisions hereof.

Also, in order to identify corruption risks and prevent possible corruption offences, the specialists of the Department for the prevention and detection of corruption conduct anti-corruption audit of business partners of SE IA «Boryspil»: the study of the experience of previous activities of the legal entities and individuals, potential contractors who intend to enter into economic relations with the Company, participate in the procedures for selecting suppliers, tender procedures for the purchase of goods, works or services, are offered as subcontractors under previously concluded contracts etc. is performed.

All contractors, entering into economic relations with SE IA «Boryspil», undertake to adhere to the requirements of this Policy.