

# CODE OF ETHICS AND BUSINESS CONDUCT





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# PURPOSE AND SCOPE OF APPLICATION





# Address of the Director General



## DEAR COLLEAGUES AND BUSINESS PARTNERS!

Boryspil International Airport is the main air gateway of our country. We have a strategic mission to be a high-tech European hub that increases the investment attractiveness of Ukraine.

Compliance standards by Boryspil Airport is crucial to the implementation of our mission and include the commitment to act ethically, following sound practices, respecting others and taking responsibility for the results of our activities.

The Code of Ethics of Boryspil International Airport State Enterprise represents the concept of our values, mandatory rules of conduct and moral principles, and clearly declares our obligations to passengers, business partners, employees and the public.

This Code contains clear rules of conduct in the workplace and covers, inter alia, areas that we consider key to our business: transparency, prevention of fraud, bribery, and corruption.

As part of our corporate values of security, customer focus, competitiveness, responsibility and sustainable development, we are committed to unequivocally respect for the rule of law and high moral standards, and to strive to create and develop an inclusive culture that values diversity.

The success of our business begins and ends with people who have deep professional knowledge, are responsible and conscientious for their duties, and perform their tasks efficiently and on time. To be a leader, we strive for excellence in everything we do and ensure that we operate legally and ethically. We are together creating the best airport in Europe, where all of us are proud of the results of our work.

**Oleksiy Dubrevskyy**

CEO

Boryspil International Airport

A handwritten signature in black ink, appearing to be 'Oleksiy Dubrevskyy', written on a white rectangular background.

# Application of the Code

The requirements and rules set forth in this Code shall be mandatory for all employees of the Airport, regardless of their positions and scope of authority (job responsibilities).

The Code shall be applied in conjunction with the regulatory legal acts of Ukraine and internal documents of the Airport, establishing additional rules and regulations applied to decision-making.

## **Airport employees are obliged to:**

1. be guided by the provisions and values set forth in the Code when performing their duties;
2. comply with the laws, rules and policies that apply to their activities;
3. bear responsibility for their actions and the results of their decisions as provided for by law;
4. report possible violations of the Code;
5. assist in the course of measures to verify alleged violations of the rules, policies, procedures provided for in this Code.
6. adhere to guidelines as following:
  - protection of information obtained during their duties performing;
  - intolerance and unacceptability of bribery and corruption in any form;
  - avoidance of potential and actual conflicts of interest;
  - conscientiousness, transparency and respect in relations with other employees of the Airport, contractors, business partners and representatives of state and local authorities;
  - a proper production environment construction.

## **The Director General, Deputy Director General for Aviation Security, directors by areas, heads of structural units, heads of work shifts (shift managers, shift supervisors, etc.) of the Airport have additional responsibilities, as following:**

1. to be a model for the Airport's employees in terms of strict and responsible compliance with the provisions of the Code;
2. promoting and maintaining a working environment where only ethical and lawful behavior is encouraged and rewarded;
3. creating a safe working environment for the Airport's employees;
4. maintaining the "open door" principle, helping Airport employees to feel comfortable reporting violations, responding promptly to them and protecting Airport employees from retaliation for such reports;
5. Identifying ethical and compliance risks and promote measures to minimize them.



# GENERAL PROVISIONS



# INTERNATIONAL AIRPORT BORYSPIL

## VISION

Our Vision is to become a high-tech European hub that increases Ukraine's investment attractiveness.

## MISSION

Our mission is to ensure the development of Boryspil International Airport, the main air gate of Ukraine, by providing high-tech services, implementing and maintaining international standards of safety, ecology, energy saving, quality and ethical behavior at the appropriate level; to create and maintain an attractive environment for all business entities engaged in aviation/non-aviation activities at the Airport.

## VALUES

**Ethical practices** - We behave ethically, establish rules of business conduct, following sound practices, respecting others and taking responsibility for our activities.

**Rule of law** – We definitely respect the rule of law, prevent corruption and bribery in the Airport's activities and adhere to high moral standards.

**Development and reputation** – We carry out continuous operational activities, preserving critical infrastructure, strive for sustainable development, create and develop an inclusive culture, uphold the Airport's reputation and maintain the image of Ukraine.

**Proficiency** – Our employees have profound competencies and are conscientious about their job responsibilities.

**Responsibility** – We bear responsibility for the quality of our services and the final result of our activities.

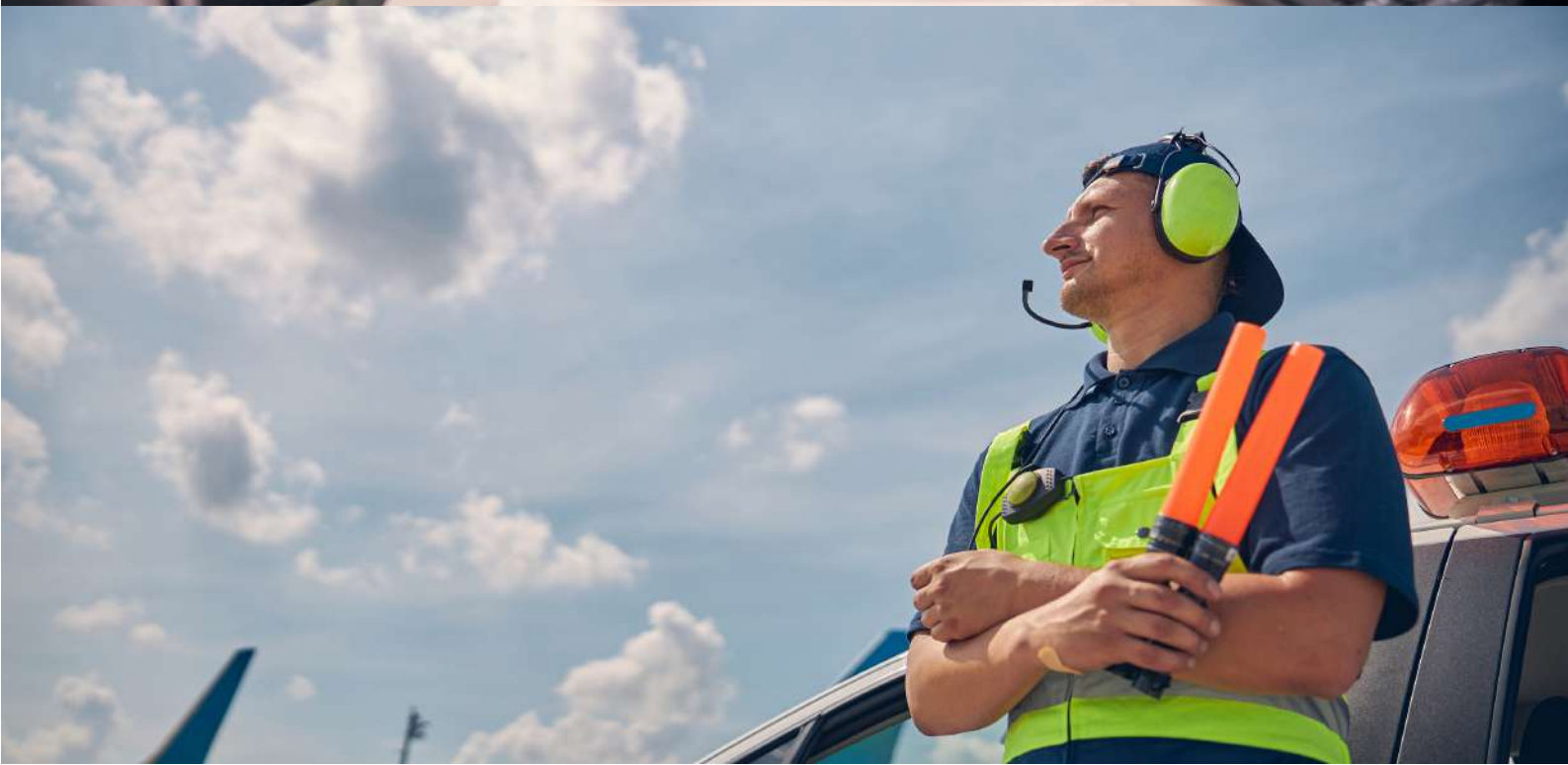
**Safety and Security** – We strictly comply with the requirements of ICAO, IATA and international standards, ensure application of high standards for quality and flight safety, provide and improve the quality of aircraft maintenance and ground handling, passenger servicing and their baggage handling, as well as cargo and mail handling, and protect the lives and health of passengers and staff.

**Transparency** – We conduct our business in an explicit and transparent manner, being honest and objective

**Customer focus** – We focus on the needs and satisfaction of our customers, take care of passenger safety and comfort, and provide a full range of services to air carriers.



# AVIATION SECURITY CULTURE





In order to implement the principles of aviation security culture, the Airport as an aviation entity continuously complies with the requirements and rules of aviation security, stimulates the improvement of the state of aviation security and promotes the importance of security measures.

Aviation security culture is an organizational culture that contributes to the achievement of optimal results in the field of aviation security and includes a set of norms, beliefs, principles, social attitudes and assumptions that are an integral part of the daily activities of the Airport's departments and personnel.

Responsibility for aviation security is the responsibility of every employee of the Airport. An effective security culture means recognizing the important role of effective security measures for successful operations, developing the right perception of positive security practices among employees, understanding the relationship between security and the main goals of the business, and clearly defining security as one of the core values.

All employees play an important role in ensuring the security of the Airport by;

- Identification of security deficiencies, such as the identification of vulnerabilities;
- being vigilant and understanding their role in solving a larger task (beyond their job duties) to help maintain their own security, the security of passengers, their colleagues and the Airport as a whole;
- immediate reporting of suspicious activities and inconsistencies.
- fulfilment of their job responsibilities to prevent and respond to security breaches

All employees of the Airport who are allowed access to the restricted access area shall know and comply with the requirements of the rules of stay in the relevant area and the procedure for interaction with the Airport departments and other authorities in case of detection of security requirements violation. Everyone is obliged to comply with security measures and immediately report violations or suspected violations of requirements.

All employees of the Airport must be deeply aware of their responsibility for security, identify and report suspicious behavior and actions; the absence of a pass in a visible place when persons are in the restricted access area; unattended, "forgotten" things in the airside and landside areas of the Airport.

In order to facilitate the collection of information on actual or potential risks at the enterprise, a system of voluntary reporting was introduced and ensured.

Violations, non-compliance with AvSec requirements and suggestions for AvSec improvement can be reported by phone at +380639806438 and by e-mail at [shsuper-dsab@kbp.aero](mailto:shsuper-dsab@kbp.aero).



# ENVIRONMENTAL RESPONSIBILITY





# ENVIRONMENTAL RESPONSIBILITY

Environmental issues are important and prioritized for us. The Airport recognizes the importance of environmental protection and feels a great responsibility for the impact of its activities on the environment. We try to avoid any harmful impact on the environment, and if this is not possible, we take measures to minimize the consequences of such impact.

Environmental responsibility is one of the key principles that the Airport adheres to when making strategic decisions and setting long-term goals.

Employees are informed about the company's policy on environmental responsibility and adhere to environmentally responsible principles in their daily activities.

We oblige everyone, without exception, to take care of the environment and to continuously improve environmental efficiency through the rational use of natural resources. Each employee must work to improve the environmental efficiency of our company and meet the environmental requirements for

- **Knowledge and compliance with environmental legislation:**

The Airport implements a systematic approach to improving its environmental performance. In our activities, we comply with the requirements of national legislation and international standards for environmental protection and use of natural resources

- **Efficient use of resources:**

We are committed to maximizing the efficient use of natural resources such as energy, water, fuel and other materials. Employees are expected to take steps to reduce waste and minimize resource consumption in their work processes

- **Rational waste management:**

Every employee is aware of the importance of waste management and contributes to reducing waste generation. We support programs for waste sorting, efficient waste disposal through recycling and reuse

# ASSETS





## **An asset is a present economic resource controlled by an economic entity as a result of past events that has the potential to generate economic benefits**

The Airport's property consists of non-current and current assets, as well as other valuables, the value of which is shown in the independent balance sheet of the Airport

The Airport's property is state property and is assigned to it on the right of economic management. In the exercise of the right of economic management, the Airport shall own, use and dispose of the property assigned to it in accordance with the requirements stipulated by the legislation of Ukraine and the Charter of the Airport

The sources of formation of the Airport property are:

- property transferred to it by central and local executive authorities;
- income received from the sale of services and products, as well as from other types of business activities;
- income from securities;
- loans from banks and other creditors;
- capital investments and budget subsidies;
- free or charitable contributions, donations from organizations, businesses and individuals;
- other property acquired on legal grounds;
- property acquired from other business entities, organizations and individuals in accordance with the procedure established by the legislation of Ukraine;
- other sources not prohibited by the legislation of Ukraine.

The Airport has no right to transfer its property to other legal entities or citizens free of charge, except in cases provided for by the legislation of Ukraine

The Airport shall alienate assets exclusively in the manner prescribed by the legislative acts of Ukraine and the Airport Charter.

The Airport shall own and use land plots and other natural resources in accordance with the purpose and directions of its activities in accordance with the legislation of Ukraine.

Intangible assets include, but are not limited to, intellectual property, including licenses, patents, trademarks, information, software and other rights to intellectual property.

The Airport employees are obliged to treat the Airport assets with care and take measures for the rational and efficient use of resources.

It is forbidden to destroy the Airport's property without documented authorization.

Unlawful use of the Airport's assets is the basis for bringing employees to disciplinary, administrative or even criminal liability in accordance with the procedure established by law

The Airport employees shall be liable for the damage caused to the Company as a result of violation of their official duties in accordance with the procedure established by the current legislation. This means that the Airport employees:

- use the Airport's assets to fulfill their duties;
- prevent loss, damage, destruction, and theft of Airport assets;
- refrain from using the Airport's assets for their own benefit.



# ACCOUNTING AND REPORTING



The Airport's accounting and financial statements provide a true reflection of the financial position, financial results and cash flows of Boryspil International Airport SE in accordance with the requirements of the Law of Ukraine "On Accounting and Financial Reporting in Ukraine" No. 996-IXV dated 16.07.1999 and IFRS

The Management is responsible for the preparation and fair presentation of financial statements in accordance with IFRS and for such internal control as the management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

The Airport's management is also responsible for taking measures within its competence to ensure the safety of the Airport's assets, to prevent fraud and other misuse and to detect any such facts

Employees are not allowed:


- to participate in the falsification of any financial, accounting or management documents;
- to establish or ensure the operation of any unregistered or unofficial funds;
- to provide incomplete or false information to the Company's internal or external auditors;
- to enter information into or to remove information from the company's accounting records with the intent to deliberately conceal, mislead or disguise the true purpose or nature of any financial or non-financial transaction or its results;
- to prepare, sign, or approve Certificates of work performed/services rendered that contain information that is not true
- to agree, approve or make payments on behalf of Boryspil IA SE if the purpose of such payments is not true or otherwise conceal their true purpose.

These rules for correct and reliable accounting and reporting also apply to all non- financial information of the Airport.

The Airport ensures that taken measures are necessary and reasonable to prevent and counteract crimes in the field of official and economic activities (fraud).

The Airport prohibits legalization (laundering) of proceeds of crime, terrorist financing and financing of the proliferation of weapons of mass destruction.



A background image showing a business meeting. In the foreground, two hands are shaking in a firm grip. The person on the left is wearing a dark blue suit jacket and a white shirt. The person on the right is wearing a light-colored suit jacket. In the background, a laptop is open on a dark table, and a white cup of coffee sits on a saucer. There are also some papers and a pen on the table. The overall scene is professional and suggests a successful business deal or agreement.

Boryspil IA SE does not violate sanctions, complies with the requirements of the legislation on legalization (laundering) of proceeds from crime, terrorist financing and financing of proliferation of weapons of mass destruction and establishes business relations only with reliable customers and contractors engaged in legitimate activities and receiving income only from legitimate sources.

The Airport operates only in strict compliance with the legislation on the application of special restrictive measures (sanctions and embargoes) and does not establish business relations with individuals or legal entities included in the list of persons and entities subject to international and other sanctions, including sanctions adopted by the National Security and Defense Council of Ukraine.

The airport takes all possible measures and follows risk-based due diligence procedures at all stages of relations with business partners.

# TRANSPARENCY OF PROCUREMENT AND FAIR COMPETITION





The airport treats its suppliers and business partners honestly, politely and respectfully. The company promotes competitive procurement procedures as much as possible. The selection of contractors is based on objective criteria such as quality, technical excellence, price, delivery, compliance with schedules, and servicing.

The airport strives to work with partners who have an impeccable reputation and comply with the law, as well as generally accepted standards of corporate and business ethics.

### **Procurement principles that guide the Airport's employees are as follows**

#### **Maximal savings and efficiency**

that mean goods, works and services are procured at the lowest price offered, but taking into account all technical and quality requirements, etc.

#### **Openness and transparency at all stages of procurement**

that mean information on procurement is available to potential participants, regulatory authorities, the public and all other stakeholders.

#### **Non-discrimination of bidders**

that means no participant has an advantage over others. There are no requirements limiting the number of participants

#### **Objective and impartial evaluation of tender proposals**

that means a careful comparison of the tenderer's proposal with its own tender documentation without giving any preference to anyone.

#### **Prevention of corruption and abuse**

that means no collusion between the customer and the potential tenderer/actual tenderer is allowed.

#### **Every employee of the Airport involved in the procurement process shows:**

##### **Competence**

It means that he/she systematically improves his/her professional level (improves his/her knowledge, skills, abilities) and communication culture, exchanges experience with colleagues.

##### **Impartiality**

It means that he/she treats procurement and tenderers fairly, does not show favoritism or give preference to individual participant and reduces subjectivity in decision-making.

##### **Accountability**

It means that he/she fulfills his/her job duties in good faith and is personally responsible for the decisions, actions or inaction taken.

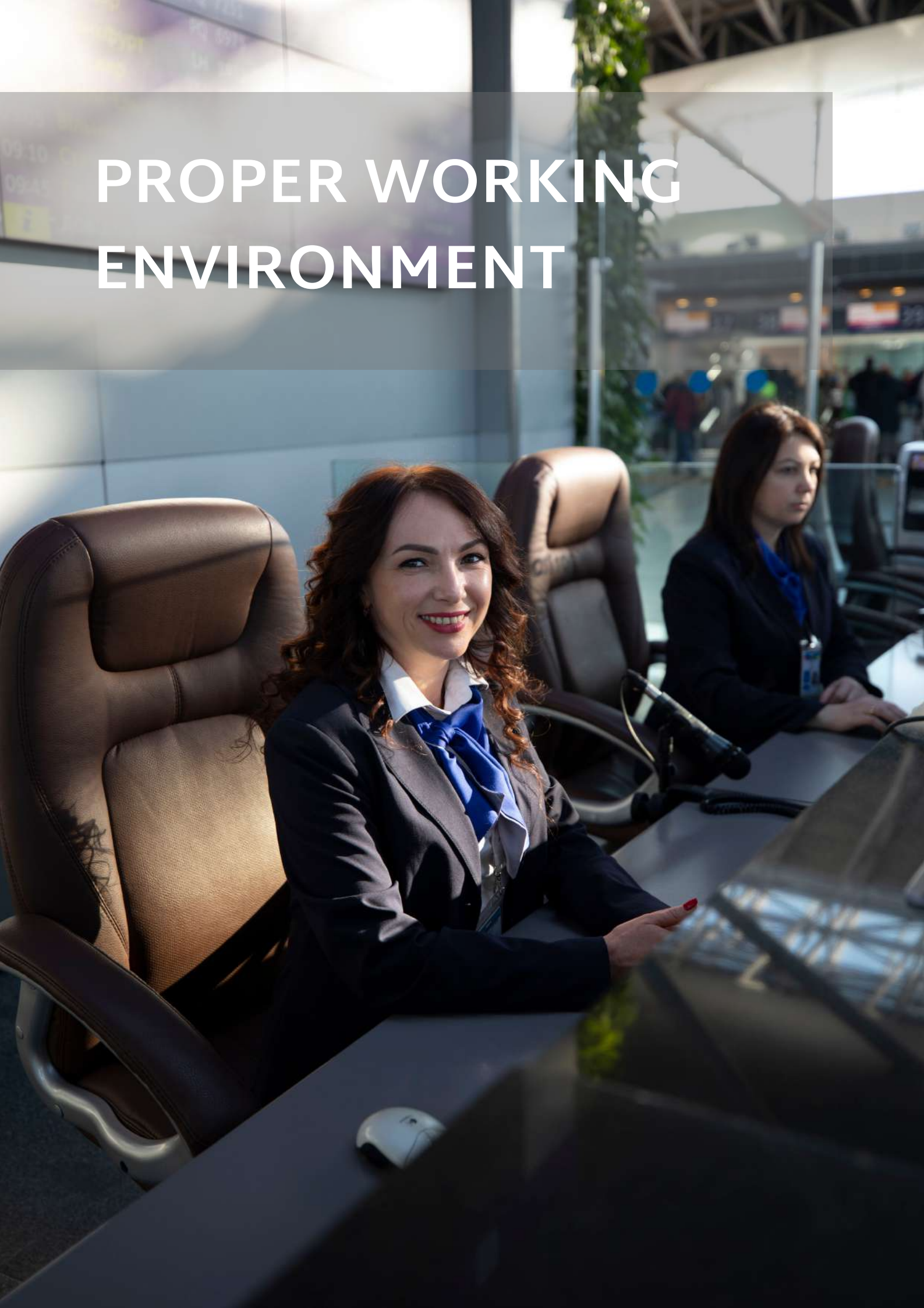
##### **Mutual respect**

It means that he/she adheres to generally accepted ethical standards of behavior, shows courtesy and respect to all parties to the procurement process.

##### **Integrity**

It means that he/she does not take advantage of its position to obtain material and other benefits when organizing and conducting procurement.

# PROPER WORKING ENVIRONMENT





# CORPORATE STYLE

The Airport employees must have a look according to the requirements to the work they are executing. The purpose of maintaining the corporate style is to create a positive image of both the employee and the company as a whole for our customers and partners.

Airport employees must have a neat appearance while at the workplace, adhere to the rules of business conduct and polite communication.

## **When choosing clothes, the Airport personnel must follow the basic rules of the dress code:**

- business casual, casual and smart casual clothing is considered acceptable, except for personnel who are required to wear uniforms or special clothing. For official protocol meetings, business clothing is used;
- clothing must be clean, well maintained and neat without damage or signs of wear;
- clothing with offensive or obscene inscriptions is not allowed;
- clothing should not be too revealing, and clothes with rips should be avoided even if they are in line with current fashion trends.

The requirements are not applied to employees if their look and clothing are required by religious or ethnic norms, provided that this does not affect the health and safety of the employee and others.

In addition, exceptions may be applied to employees with disabilities, taking in to account medical contraindications.

The Airport does not restrict staff to have tattoos, but asks them to cover them when working directly with customers and partners where possible.

The Airport allows its staff to wear jewelry, but we ask that piercings on visible parts of the body be removed if the employee has direct contact with the Airport's customers and partners.

All employees are expected to maintain an acceptable level of personal hygiene to ensure that interactions with other staff and customers leave a positive impression.

# EQUAL OPPORTUNITIES, RESPECT AND DIGNITY

All employees of the Airport have equal opportunities and conditions for career and professional development. The company has created all conditions for the activities of trade unions, and a Collective Agreement signed between the administration and trade unions, which sets out social guarantees and protection of the Airport's employees, is in force.

The Airport is an employer that provides equal opportunities to all employees. Discrimination of the Airport employees or candidates for employment or establishment of privileges for them due to race, religious, national or social affiliation, political or other views, skin color, gender, functional health limitations, marital or partnership status, sexual orientation and any other characteristic protected by law is not allowed. The Airport's business decisions as an employer are based solely on legitimate, non-discriminatory criteria such as competence, potential, experience, qualifications and performance.

The Airport treats each employee with respect and promotes equal opportunities. The Airport maintains an atmosphere of trust and respect aimed at providing an effective working environment where everyone can implement their professional potential.

## PROHIBITION OF HARASSMENT, BULLYING AND VIOLENCE IN THE WORKPLACE

The Airport maintains zero tolerance to any manifestations of violence and aggressive behavior. The Airport does not tolerate any physical, sexual, psychological or verbal harassment, bullying, abuse or threats in the workplace at the Airport.

Any disputes of the Airport employees aroused while performing their official duties, shall not be resolved by violence, threats or other aggressive actions or behavior.



# SAFE AND HEALTHY WORKING ENVIRONMENT

The Airport is committed to maintaining a healthy and safe working environment and preventing all accidents and injuries in the workplace.

The Airport employees understand the need to comply with the requirements of the legislation and internal regulations of the Airport on labor protection. The Airport employees shall take care of their personal safety and health, as well as the safety and health of other people in the process of performing any work while being on the territory of the Airport.

The Airport employees bear responsibility for violation of the provisions of regulatory legal acts on labor protection.

In case of detection of hazardous working conditions, violations of labor protection, the Airport employee shall notify the head of the structural unit for taking appropriate response measures.

## PROHIBITION OF ALCOHOL AND DRUGS

The use, manufacture and distribution of alcoholic drinks, as well as the use, manufacture, distribution and storage of narcotic and/or other psychotropic substances or other intoxicants in the workplace on the territory of the Airport and in other places during the performance of official duties by the Airport employees, as well as being in public under the influence of the above substances or offering such substances to employees and customers of the Airport, as well as to third parties is prohibited.

If there is a reasonable suspicion that an employee of the Airport is in a state of alcoholic narcotic or any other intoxication at the workplace, the immediate manager or employee of ACC&FC has the right to require such employee to undergo an appropriate medical examination or testing.

Smoking on the territory of the Airport is allowed only in specially designated places.

# PROTECTION OF INFORMATION





# USE OF INFORMATION SYSTEMS

Information systems are crucial for the daily operations of Boryspil International Airport.

## **In order to protect them, the Airport employees:**

1. Comply with the requirements set forth in the "Rules for the Use of Network IT Services" and the "Regulations on the Use of Removable Storage Media" regarding:

- arrangement (provision and receipt) of access to information resources necessary for the performance of their work duties;
- storage and authorized distribution of information belonging to the Airport;
- setting and using strong passwords to information systems;
- use of the company's information and communication systems to perform their job duties. It is forbidden to visit or distribute Internet resources for unauthorized, illegal or unethical purposes or to view or download any humiliating or obscene materials;
- installation and usage of software to perform their work duties. It is prohibited to install unlicensed equipment or software in the Airport information systems.

2. Comply with the requirements for antivirus protection set forth in the Regulations on the Organization of Antivirus Protection of Servers and Workstations;

3. Comply with the requirements set forth in the Regulations on Remote Access to the Company's Information and Telecommunication Systems and recommendations for the safe use of personal electronic devices, when working remotely with the company's information systems;

4. Follow the general rules of cyber hygiene;

5. Comply with the requirements of the legislation and internal documents of the Airport to ensure the protection of information systems.

When using the company's information systems, all employees should be aware of the fact that all communications that take place through the information systems of "Boryspil" IA SE are not considered to be private. When writing e-mails or other electronic messages in the information systems of Boryspil International Airport SE, it is necessary to follow the rules of official correspondence and avoid information that may harm the Airport's business reputation or negatively present its activities

# USE OF RESTRICTED INFORMATION

All business information is a valuable and vital resource of the Airport. This means that the information must be protected no less reliably than any other asset of the Airport.

## **Within the framework of the Information Security Policy, the Airport.**

- defines the list of data constituting restricted information, securely store such information and protect it from unauthorized access by persons other than the Airport employees;
- applies software and hardware security measures to ensure the confidentiality, integrity and availability of protected information;
- communicates the restricted information to a restricted number of people solely for the purpose of performing their official duties;
- recognizes the liability to secure the Airport's restricted information after termination of employment.

Each employee is obliged to comply with the requirements of Ukrainian legislation and the Regulations on Restricted Information at Boryspil International Airport.

Employees shall not disclose or otherwise use restricted information that they have become aware of due to the execution of their official duties, except in cases established by law.

Employees are prohibited from using any information obtained during execution of their official duties for personal gain or contrary to the interests of the Airport.

For disclosure of restricted information, the Airport employee may be subject to liability measures in accordance with the law.

The Airport does not allow the dissemination of false information and distortion of facts.



# INSIDER INFORMATION

The protection of the Airport's trade secrets and confidential information is essential for the Airport's reputation as a reliable business partner.

**During their employment and after termination of such business relations, Employees of the Airport shall be obliged to:**

- observe strict confidentiality, not to disclose, not to transfer to third parties, including family members, not to disclose publicly in any form without the written permission of the Airport management information constituting a commercial secret or confidential information of the Airport, which is entrusted to them or became known within execution of their official duties. Information that is not intended for public access shall be kept secret;
- maintain confidentiality regarding trade secrets and confidential information of counterparties and business partners that has been entrusted to them or has become known in the course of their official duties;
- not use commercial secrets and confidential information received from the Airport for mercenary or other personal reasons in activities that may harm the Airport;
- immediately notify the BIA and ACC&FC of any attempts by unauthorized people to obtain any data about the Airport's activities that contain restricted information of the Airport.

# PRIVACY POLICY

The Airport respects the right to privacy and ensures compliance with the requirements of Ukrainian legislation in the field of personal data protection.

The Airport adheres to the regulations on the protection of personal data and confidential information about employees, contractors and other persons with whom the Airport interacts (hereinafter referred to as personal data of individuals) and ensures their proper storage and use.

**Employees who have access to and process personal data of individuals in order to perform their duties shall be obliged to do the following:**

- collection and usage of personal data for the purpose and to the extent necessary for the performance of their job duties only;
- protection of personal data from accidental loss or destruction, unlawful processing, including unlawful destruction or unauthorized access to personal data;
- immediate reporting of any suspected violation or breach already in place related to the personal data processing to the structural unit or responsible person who manages personal data protection during their processing procedure;
- knowledge and compliance with all legal and contractual obligations governing legal relations for protection and processing of personal data.

**The liabilities of the Airport employee to protect and not to disclose personal data of individuals shall be unlimited and shall remain after termination of employment with the Airport.**



# RELATIONS WITH THE MEDIA



The Airport builds relations with the media on the principles of openness and transparency, efficiency and readiness for dialogue. We strive to maintain high ethical standards of communication.

The Directorate for Communication, Media and Public Relations is responsible for the implementation of the Airport's communication policy on interaction with the media and the public; the said Directorate informs all stakeholders and the media about the Airport's activities, achievements and strategic development on the principles of openness and transparency, timely and reliable information through available means of communication and on the official website of the Airport.

Publications and statements regarding the company's activities in the media, as well as giving speeches and interviews, at the conferences, forums and panel discussions, must be approved by the Airport's Communications, Media and Public Relations Directorate.

Only Airport's CEO and the Airport's approved speakers may publicly speak and provide comments on the Airport's activities in the presence of media representatives, as well as at events with the participation of the media representatives, upon approval by the Directorate for Communications, Media and Public Relations within its competence. Other employees, who do not have such authority or appropriate permissions, shall avoid any statements or expressions that may be perceived as the official position of the Airport.

The Airport employees have the right to freedom of thought and speech, to free expression of their views and beliefs. At the same time, the Airport employees should take into account that the publication of content in the media, even for personal purposes, may negatively affect the business reputation of the Airport.

If an employee of the Airport decides to publish information about his/her affiliation with the Airport, such an employee should make sure that his/her actions, publications and behavior in the media meet the expectations of the Airport in accordance with the provisions of this Code.





# ANTI-CORRUPTION POLICY AND COUNTERACTION TO BRIBERY



# ANTI-CORRUPTIONPOLICY



The Airport maintains zero tolerance and intolerance (absolute rejection) of any form of corruption and bribery. The Airport does not use corrupt practices to facilitate formalities and/or obtain any advantages in its activities and the company acts in accordance with the requirements of anti-corruption legislation.

In order to prevent and counteract corruption, the Airport develops and implements the Anti-Corruption Program, policies and procedures aimed at compliance with anti-corruption legislation, international regulations and standards.

Anti-corruption compliance has been integrated into all business processes of the Airport without exception to effectively manage corruption risks and make balanced business decisions.

The Airport shall take necessary and reasonable measures aimed at strengthening financial control in the process of procurement, operational and any other activities.

Employees of the Airport shall immediately inform the Head of ACC&FC as a person responsible for the implementation of the Anti-Corruption Program about cases of abuse of authority, inducement to commit a corruption or corruption-related offense, as well as cases of corruption or corruption-related offenses committed by employees of the Airport or other persons.



# CONFLICT OF INTEREST

The Airport employee shall avoid situations where his/her private interest may affect the ability to act objectively while performing duties in the interests of the Airport.

The Airport employee shall independently assess the conditions and actions that affect or may potentially affect the objectivity or impartiality of decision-making, performance or non-performance of actions during execution of his/her duties. In the event of a conflict of interest, the Airport employee shall notify his/her immediate supervisor and the ATS and FC in writing to find ways to determine measures and solve the conflict of interest.

An employee has no right to take actions or make decisions in the context of a conflict of interest.

# BUSINESS GIFTS AND BUSINESS HOSPITALITY

Business transactions should always be free from the notion that effective cooperation can be ensured through gifts, congratulations, hospitality, entertainment, etc.

Airport managers and employees are prohibited from demanding and/or accepting gifts and/or improper benefits from passengers, contractors, partners, etc. for the services provided by the Airport.

The Airport allows accepting or providing gifts that meet the generally accepted concepts of hospitality, except in cases provided for by the Law of Ukraine "On Prevention of Corruption".

In this case, the value of the gift may not exceed one subsistence minimum for able-bodied persons established by law on the day of acceptance of the gift, once. The aggregate value of gifts received from one person (group of persons) during a year should not exceed two subsistence minimums established for an able-bodied persons of January 1 of the year in which the gifts were accepted.

## **Gifts and business hospitality accepted and offered must meet the following criteria:**

- are not presented for the purpose of obtaining an unlawful advantage or influence;
- must not be in the form of cash or its equivalent (a payment instrument that replaces cash, securities, a gift certificate, etc.);
- gifts and business hospitality do not contradict the current legislation.

Business hospitality and business gifts should not influence or oblige the Airport employees to make business decisions.

The procedure for informing the Airport employees about business gifts and business hospitality, the rules for refusing them, approving, registering and selling gifts are defined by the Airport's Anti-Corruption Program and the Regulations on Business Gifts.

A gift of a value exceeding the permitted limit specified above and the receipt of such a gift cannot be refused, must be reported about to ACC&FC, indicating information about the giver and the recipient of such a gift, the nature of their relationship and information about the gift itself.



# INTERACTION WITH GOVERNMENT AUTHORITIES

Realizing the social significance of the results of its activities and responsibility to the state, the Airport maintains stable relations with the governmental and local authorities based on the principles of legality, professionalism, mutual trust, respect and the sanctity of obligations.

**To implement the policy of cooperation with the state authorities, the Airport implements the following:**

- provision of information as required by law upon request of public authorities to the extent and in the manner prescribed by law, and the company does not conceal, delay or distort information;
- cooperation with state and local authorities in the manner and manner prescribed by applicable law;
- avoidance of harsh statements and unjustified criticism of public authorities.

When interacting with government officials, employees are required to comply with Ukrainian legislation and ethical standards of behavior.

The Airport does not make any attempts to illegally influence the decisions of state and local authorities, pays taxes and mandatory payments in a timely manner and in full.

# CHARITY AND POLITICAL ACTIVITY





## POLITICAL ACTIVITY

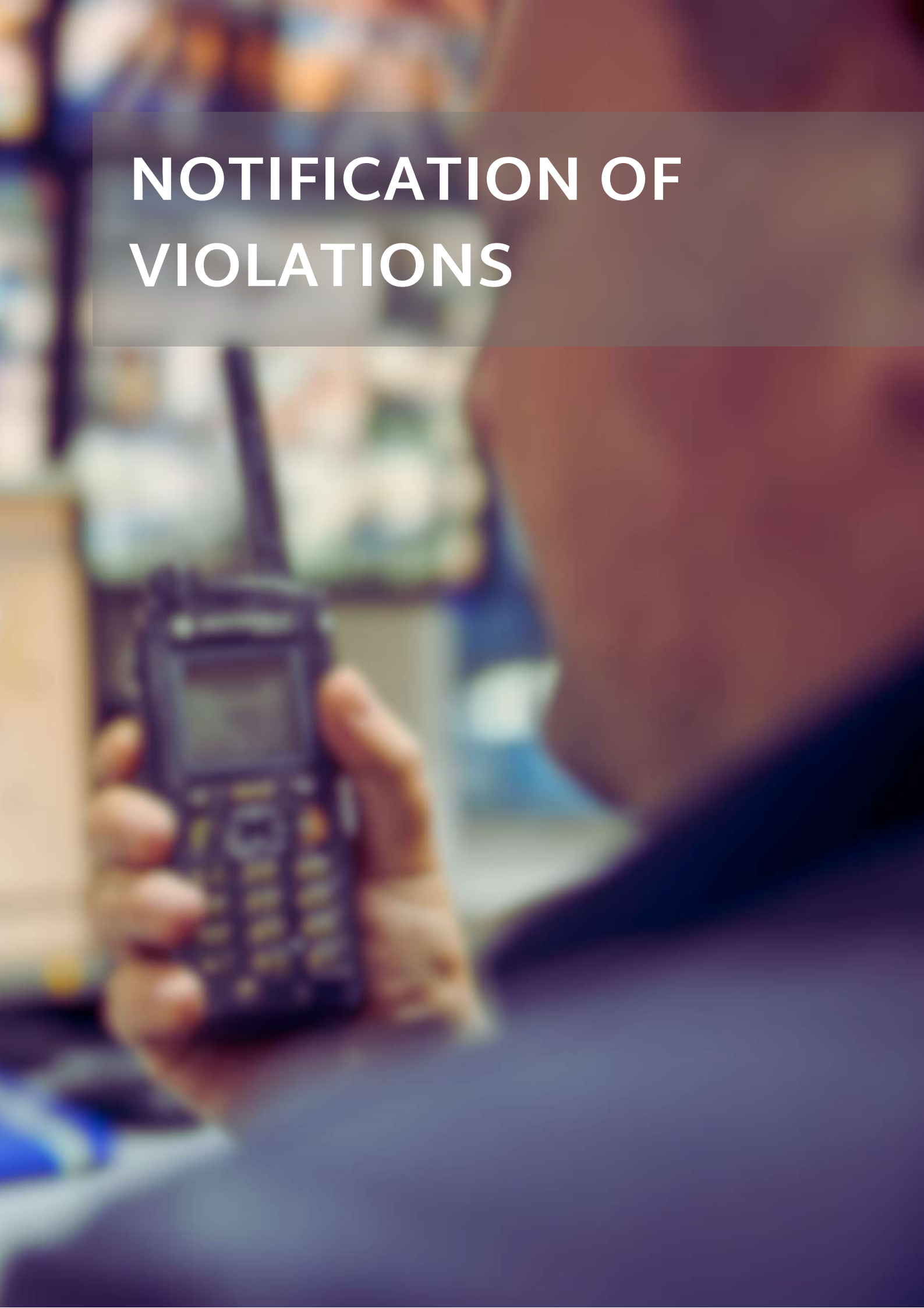
The Airport employees do not participate in campaigning and political activities during working hours. The Airport does not finance political organizations. In the field of public activities, the Airport employees may conduct non-prohibited activities outside the territory of the Airport and in their free time.

The Airport does not allow the use of its name, financial, material or any other resources of the Airport for political, religious or social activities.

## CHARITY

Any donations or sponsorships must comply with the laws of Ukraine and may be made on a voluntary basis, without expectation of any personal benefit, privilege or advantage.

# NOTIFICATION OF VIOLATIONS

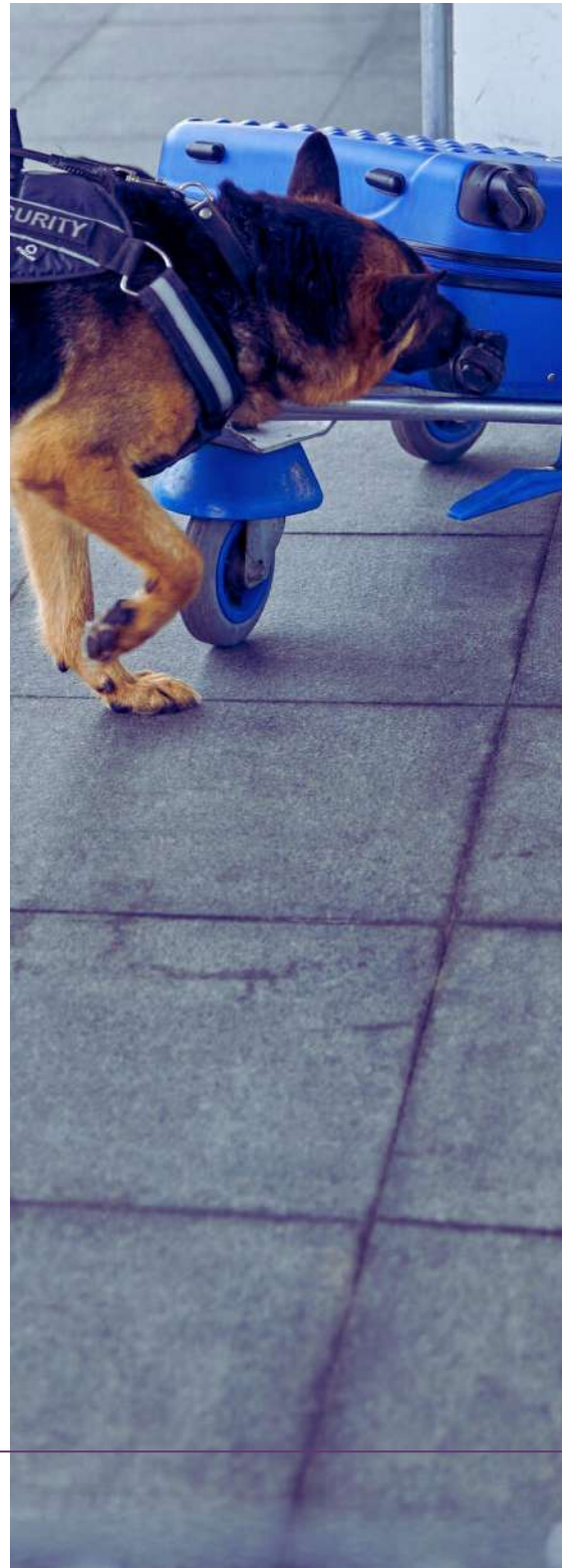




# NOTIFICATION OF VIOLATIONS

The Airport adheres to ethical standards of doing business, therefore, requires conscientious compliance with the established rules of business conduct and considers unacceptable and prohibited any deliberate and conscious violation of this Code, approval or disregard of behavior that violates the Code and requirements of the Airport's internal documents.

The Airport officials and other employees shall comply with the legislation of Ukraine, regulations of the Ministry of Infrastructure, SASU, international aviation industry standards, internal documents and procedures of the Airport.



# NOTIFICATION OF VIOLATIONS

In the event of situations that raise ethical doubts and/or violations of the Code, or situations related to criminal or fraudulent actions, suspicion or fact of unacceptable behavior, any employee of the Airport shall without any delay, but not later than one business day, report suspicions and/or facts known to him/her in one of the following ways:

- 1) contact his/her immediate supervisor in any convenient form. If an employee of the Airport has any reason to believe that his/her immediate supervisor is involved in violation of the legislation of Ukraine, this Code or other internal documents of the Airport, the employee shall immediately notify the ACC&FC in any form as follows;
- 2) calling the Airport's help line at **044-281-73-28**;
- 3) sending an e-mail to **anticor@kbp.aero**;
- 4) leaving a message via other channels indicated on the official website of the Airport;
- 5) contacting the Head of the ACC&FC by:
  - ending an email to the corporate email address;
  - a phone call during business hours from Monday to Friday;
  - a personal meeting during business hours from Monday to Friday at the following address:  
Profactory, 2nd floor, room. 30.
- 6) contacting the ACC&FC employees by:
  - sending an email to the corporate email address of the relevant ATS and FC employee;
  - a personal meeting with an employee of the ACC&FC during working hours from Monday to Friday: Profactory, 2nd floor, rooms No. 7, 9, 25.

When contacting the Airport's helpline, the employee will be asked to provide his/her contact information for further communication in order to obtain additional information if necessary. An employee may also contact the Airport's hotline anonymously.



# A CULTURE OF WHISTLEBLOWER PROTECTION



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The Airport promotes creation of a free and open atmosphere that encourages employees, business partners and others to make inquiries, raise work-related concerns, ethical issues and/or report violations or suspected violations of laws, rules, policies and procedures or this Code.

The Airport respects the right to confidentiality, unless disclosure of information about the whistleblower is required by law. In support of this commitment, the Airport maintains a zero-tolerance policy for any acts of retaliation against an Airport employee who has reported a violation or suspected violation or participated in the investigation of a violation.

The options for reporting a violation or suspected violation allow the Airport employee to remain anonymous.

It is strictly forbidden to bring to disciplinary responsibility or apply other negative measures of influence to the Airport or its individual employees due to their reporting of behavior that they reasonably believe to be illegal or otherwise violating the law and/or this Code, even if the information in the report is not confirmed by the results of the inspection.





# LIABILITY FOR VIOLATION OF THE CODE



All employees of the Airport, regardless of their position and duration of service at the Airport, shall be guided by the requirements and strictly comply with the norms and principles of the Code in their professional activities.

Each employee is personally responsible for compliance with the Code.

The manager is responsible for the implementation of the Code by his/her subordinates, shows a model of ethical behavior of the Airport employee by personal example, helps to correctly interpret the rules and norms of professional ethics and business behavior.

The Airport shall have the right to investigate any cases of unethical behavior of the Airport employees and violation of the requirements of this Code.

In order to clarify the circumstances of possible violations committed by the Airport employees, namely non-performance or improper performance of duties assigned to them by the Constitution, legislation of Ukraine, internal documents of the Airport, this Code, as a result of which the Airport suffers negative impact or losses, an internal investigation or inspection may be conducted.

The grounds for an internal investigation or inspection shall be the appeal of individuals and legal entities, information available to the Airport or in open sources about the fact or signs of a violation. The procedures for appointing, conducting an internal investigation or inspection, as well as the execution of their materials shall be regulated by the internal documents of the Airport.

During the official investigations and inspections at the Airport, the Airport employees shall provide explanations, if any, submit relevant documents and materials related to the circumstances under investigation, and take all necessary measures to facilitate the official investigations and inspections at the Airport.

The CEO, on his/her own initiative, at the suggestion of the ACC&FC or at the initiative of the direct supervisor of the employee who committed a violation of the Code, shall decide on the application of appropriate sanctions, including full or partial deprivation of bonuses in accordance with the Airport's internal documents, and, if the employee's actions show signs of a disciplinary violation, also on disciplinary measures - reprimand or dismissal.

Disciplinary sanctions are applied in accordance with the current legislation, internal documents of the Airport and the provisions of the Collective Agreement.

Information about any fact or signs of a violation may be transferred by the Airport to law enforcement bodies for taking response measures provided for by law and bringing the perpetrators to justice in accordance with the procedure established by the current legislation.




The Airport employees shall take all necessary measures to develop interaction with law enforcement bodies for prevention and counteraction to offenses. For this purpose, the Airport employees shall timely, in accordance with the legislation of Ukraine and within their competence, provide information and documents necessary for prompt, comprehensive and impartial consideration of information on offenses and crimes.

Control over compliance with the provisions of the Code is assigned to the ACC&FC.

# FINAL PROVISIONS







The Code is a key element of the mechanism for implementing compliance control at the Airport, creating a culture of integrity and a condition for the introduction of corporate values, business behavior standards, protection of interests of employees, customers and business partners of the Airport.

**Всі працівники Аеропорту зобов'язані:**

**All Airport employees are obliged to do the following:**

- read this Code when hiring or not later than one (1) month from the date of approval of this Code and/or amendments hereto;
- submit an Employee Integrity Questionnaire in the form set at Appendix 1 hereto, duly filled in and signed.

The PM&DD staff is responsible for providing and collecting the Employee Integrity Questionnaire in the form set in Appendix 1 to this Code when hiring.

Heads of the structural units are responsible for filling in and collecting of the employee's Integrity Questionnaire in the form set in Annex 1 to this Code within 1 (one) month from the date of approval of this Code and/or amendments hereto by all employees of subordinate structural units and transfer of the said documents to the ACC&FC for storage.

The ACC&FC organizes systematic work to develop a culture of integrity and professional ethics of employees, in particular through outreach, monitoring and periodic testing of the level of knowledge and understanding of the Code, training activities, analysis of reports and control measures.

The Code shall be reviewed as necessary, but not less than every 3 (three) years, and may be amended by approving a new version.

The text of the Code is published on the official website of the Airport.