



Dear Colleagues and Business Partners

The full-scale war has dramatically changed the conditions in which Boryspil International Airport operates. Now we are continuing to work but not performing our usual operational activities. We have changed our strategy from development to survival.

Now all the efforts of the airport employees are aimed at maintaining the airport infrastructure - it is serviceable; as well as at keeping the terminals and airfield operational; retaining and constantly training highly qualified personnel.

In such circumstances, the issues of integrity, transparency and good governance are of particular importance. Therefore, the development and implementation of the Anti-Corruption Programme is a conscious decision to build trust in our team.

This programme is a reflection of our principled position: even in the most difficult times, we have no right to lose our internal stability, integrity and responsibility. This document defines the tools to prevent corruption, minimise risks and create a culture of zero tolerance for abuse at all levels.

We are not only maintaining our operational capability, but also building a new quality of corporate management based on the principles of transparency, accountability and lawfulness.

Oleksiy Dubrevskyy CEO Boryspil International Airport







Preamble (values)

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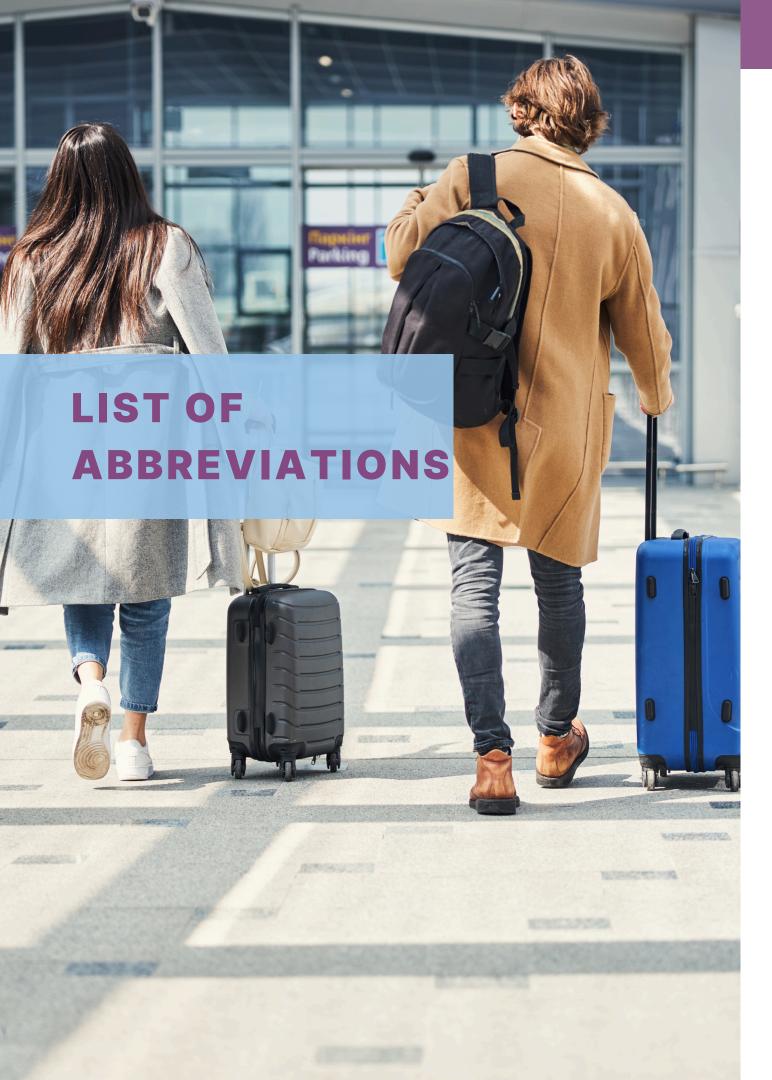




With this Anti-Corruption Program (hereinafter referred to as the Program), being aware of the responsibility for affirming the values of the rule of law and integrity, striving to ensure its sustainable development, developing its own business reputation, encouraging the use of fair commercial practices, and also in the interests, in particular, but not exclusively, of its founders, employees, business partners, customers, Boryspil International Airport State Enterprise (hereinafter referred to as Boryspil IA SE) declares that its management bodies, officials and employees in their activities as well as in legal relations with business partners, state authorities, local self-government bodies, other legal entities and individuals are guided by the principle of zero tolerance for corruption in any of its forms and manifestations and take (will take) all measures to prevent, detect and combat corruption, provided for by law and this Program.

Boryspil IA SE declares its principled position and condemns corruption as an illegal and unethical way of doing business.

Boryspil IA SE undertakes to form a high culture of internal behavior and update the elements of the system of rules applied at the enterprise to the level of the best global compliance practices in order to meet the standards established by them.





Charitable Activity — non-profit assistance without compensation, which does not involve benefits for the enterprise.

Contribution to a Political Party — any direct or indirect support of the party (money, services, goods) prohibited for state-owned enterprises.

Business Hospitality — expenses for representative events (lunch, tickets, accommodation) to establish business relations.

Business Partners — people with whom a business relationship has been or may be established. **Encouraging payments** — illegal «thanks» for speeding up formal procedures. They are prohibited.

Corruption Risk — probability of offence against the law that may cause harm to the company.

Improper advantage — any unjustified tangible or intangible advantage.

Zero Tolerance — an absolute prohibition of corruption in any form.

Representative of the enterprise — an authorised person acting on behalf of Boryspil IA SE **An Official** — all those who perform authority functions, including foreign and international employees.

An Authorized Officer — a person responsible for the implementation of the anti-corruption programme at Boryspil IA SE.

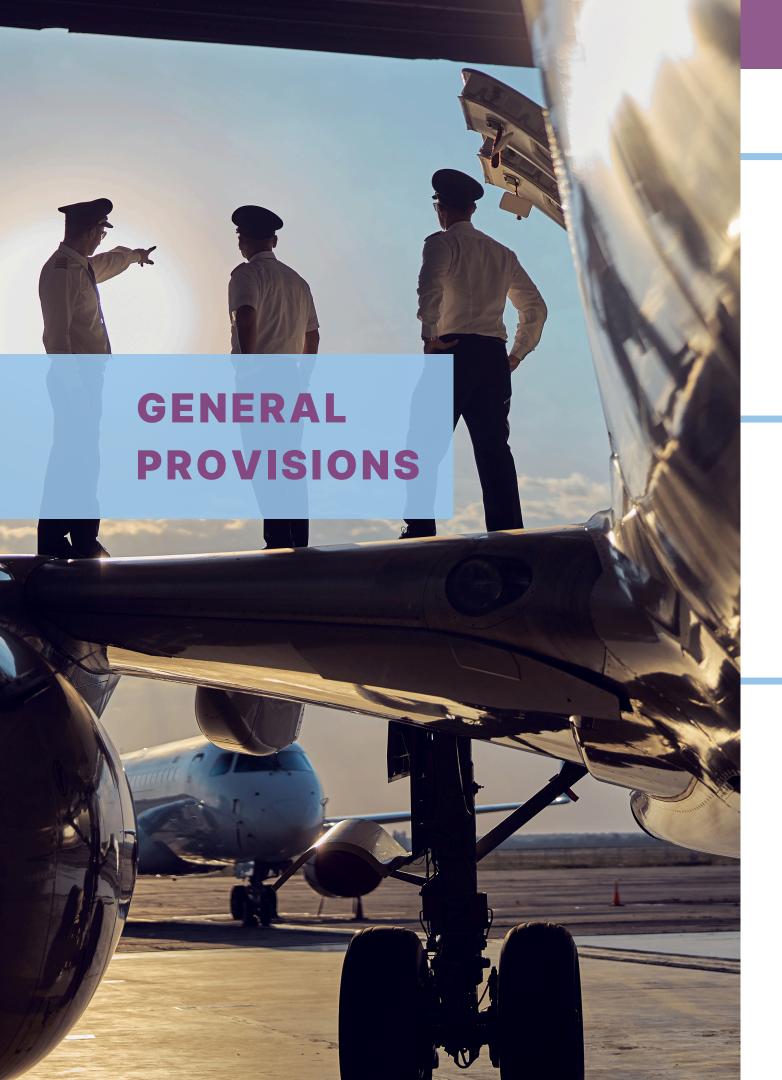
An authorised management body — the Ministry for Development of Communities and Territories of Ukraine

Management bodies — the Airport's CEO and the Supervisory Board

The Supervisory Board is the Airport's governing body, which controls and regulates the activities of the CEO and the Airport within the competence defined by the legislation of Ukraine and the Charter of Boryspil IA SE

Director General is the head of the Airport, who manages the Airport and is accountable to the Supervisory Board of the Airport and the Authorised Management Body within the limits established by the legislation.

All other terms used in this Programme shall have the meanings ascribed to them in the Law of Ukraine "On Prevention of Corruption."





THE PURPOSE AND SCOPE OF THE PROGRAMME

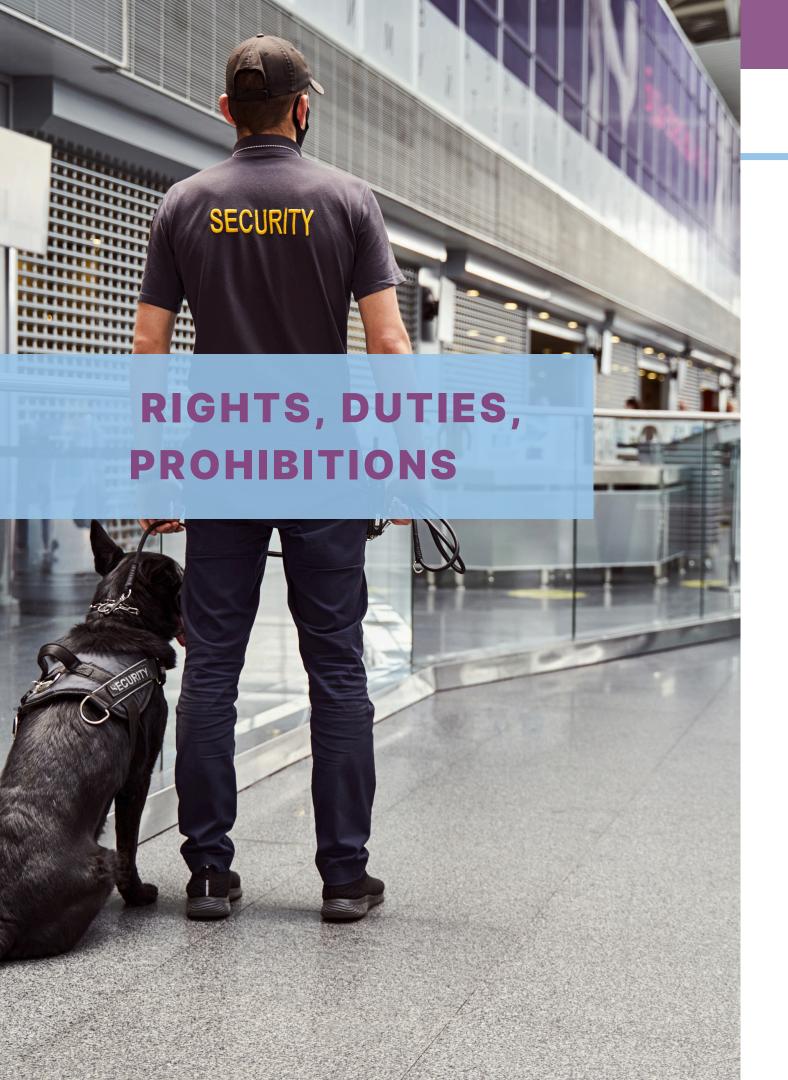
is to create an effective system of preventing and combating corruption in accordance with the legislation of Ukraine and leading international standards. The Programme is mandatory for all employees, departments, branches and partners of Boryspil IA SE and applies to all areas of the enterprise's activities. It is integrated into the company's internal policies and documents, and its violation entails liability regardless of other legal consequences.

RESPONSIBLE LEADERSHIP AND INTEGRITY

is a key principle of the Programme. The airport management team shall demonstrate zero tolerance to corruption, ensure the systematic implementation of anti-corruption measures and create appropriate conditions for the independent work of the Commissioner. The staff are encouraged to behave ethically, comply with anti-corruption policies, perform their duties conscientiously and report violations in a timely manner, being guaranteed whistleblower protection.

THE STANDARDS OF PROFESSIONAL ETHICS

establish the obligation for each staff member to adhere to a code of ethics, to behave objectively and impartially without being guided by personal interests, and to respect the beliefs of others. Execution of criminal orders is strictly prohibited, and employees who refuse to engage in corrupt or illegal activities cannot be held liable - such refusal is considered a manifestation of integrity.





THE RIGHTS, OBLIGATIONS AND PROHIBITIONS FOR BORYSPIL INTERNATIONAL AIRPORT SE EMPLOYEES

are clearly defined within the anti-corruption programme. Each employee has the right to make proposals for improving the company's anti-corruption policy, as well as to receive consultations from the Commissioner on issues related to the identification and minimisation of corruption risks.

At the same time, all employees should strictly comply with the requirements of anticorruption legislation, report known violations, conflicts of interest or cases of business hospitality, and perform their duties with integrity without creating any grounds for suspicion of involvement in corruption.

It is forbidden to offer or receive unlawful benefits, abuse official authority, influence the decisions of other employees in order to gain advantages, or violate the established rules on gifts acceptance, business hospitality or conflicts of interests.

The use of company resources for personal benefit or disclosure of confidential information is also prohibited. A special focus is made on the absolute prohibition of so-called "facilitation payments", that is, unofficial 'gratitude' to officials, regardless of cultural traditions or jurisdiction.





THE ANTI-CORRUPTION OFFICER

is appointed by the Head of Boryspil International Airport State Enterprise and is subordinated only to him/her.

He/she has the right to engage employees, control their work, and in certain departments he/she may be assisted by Responsible Persons. The Commissioner's responsibilities include developing anti-corruption documents, conducting risk assessments, training, inspections, keeping registers, organising internal reports and investigations, as well as consulting and interacting with the NAPC and government agencies. He/she ensures whistleblower protection and monitoring of the Programme implementation.

In his/her activities, the Commissioner has the right to initiate inspections and meetings, access information and documents, monitor the work of the Responsible Persons, participate in the work of commissions, apply to the NACP and request the necessary resources.

His independence is secured: the suspension of the Commissioner from performing his official duties by the head of the Boryspil State Enterprise is subject to the prior consent of the Supervisory Board or the Authorised Management Body*. The dismissal of the Commissioner from his/her position at the initiative of the head of the enterprise is subject to the consent of the National Agency for Corruption Prevention in accordance with the established procedure, and any interference is prohibited.

The management is responsible for ensuring appropriate working conditions such as an office, computer, access to communications, and the required documents and resources.

These guarantees of independence, proper functioning, access to resources, and protection from interference also apply to employees of the Anti-Corruption Service. They are also required to be provided with appropriate conditions for the effective performance of their duties.





BORYSPIL INTERNATIONAL AIRPORT SE IMPLEMENTS A CORRUPTION RISK MANAGEMENT SYSTEM,

based on a risk-oriented approach. It provides for regular assessment of risks in business activities, evaluation of their levels, analysis of the effectiveness of existing measures and development of new mitigation tools. The assessment is to be conducted at least once every two years, both by the working group and by third-party experts.

The results are summarised in a risk register, which includes a description of risks, sources, threat levels, proposed measures, implementation timeframes and responsible persons. The register is submitted to the CEO for approval, after which the measures are implemented in the company's operations.

The Commissioner monitors implementation, reports on progress and ensures that measures are updated in response to changes in the internal or external environment.





BORYSPIL INTERNATIONAL AIRPORT SE SYSTEMATICALLY CONDUCT TRAININGS TO INCREASE THE ANTI-CORRUPTION AWARENESS OF THE EMPLOYEES.

The Commissioner arranges mandatory reviews of anti-corruption legislation, internal documents and amendments thereto for all categories of personnel, including new employees and business partners. They are held regularly in accordance with the annual plan: in the form of onsite or remote lectures, workshops, webinars.

Topics are tailored to respond to changes in legislation, audit findings, risk assessments and employee suggestions. In the event of corruption incidents, extraordinary training is provided for employees involved in risky processes. Awareness raising activities are completed with a final test or other type of output knowledge control, the results of which are assessed by the number of points scored. In case of failure to obtain the set number of points, the Commissioner may take appropriate response measures.

Moreover, the Commissioner provides employees with individual consultations on the provisions of the Programme and anti-corruption legislation - orally or in writing - within 10 (maximum 30) days. He/she also aggregates the most frequently asked questions and disseminates explanations through internal communication channels, leaflets, emails or other convenient formats.





PREVENTION AND SETTLEMENT OF CONFLICTS OF INTEREST

Boryspil International Airport SE introduces a preventive approach to managing conflicts of interest, i.e. employees, management, representatives and members of collegial bodies must immediately report any real or potential conflict.

The notification is sent to the Commissioner and the immediate manager, and the latter is to determine the method of settlement within two working days. The measures may include removal from decision-making, restriction of access to information, transfer, dismissal, etc.

A conflict of interest among representatives is a ground for termination of relations. In the work of collegial bodies, persons with a conflict of interest are not entitled to participate in the preparation, consideration or voting on the relevant issue; if necessary, decisions are made under external control with the participation of the Commissioner as an observer.

Typical situations of conflict of interest include actions in favour of close relatives, entering into transactions with related parties, participation in businesses with a similar field of activity, making decisions about the self, etc.

VETTING OF CANDIDATES FOR POSITIONS

During the recruitment process, Boryspil International Airport SE conducts vetting of candidates for positions to determine whether the conclusion of an employment contract with a candidate poses any risks to Boryspil International Airport SE, including corruption risks.

Boryspil International Airport SE may form a list of positions that are vulnerable to corruption risks. During the vetting of candidates for positions vulnerable to corruption risks, a psychophysiological examination with the use of a polygraph may be conducted, with due regard to the legislation. Boryspil International Airport SE may apply internal control procedures to persons holding positions vulnerable to corruption risks, such as internal declaration, in line with the procedure set forth in internal documents.





INTERACTION WITH BUSINESS PARTNERS

Boryspil IA SE establishes transparent requirements for cooperation with business partners, e.g. cooperation is only permitted with those entities whose activities comply with the legislation requirements, ethical standards and do not pose any corruption risks.

Providing public access to this Programme and other internal policies, Boryspil International Airport SE informs business partners about its the principles and requirements in the field of integrity and compliance, prevention and counteraction to corruption, including the procedure for vetting business partners prior to establishing business relations with them.

If there are reasonable doubts about the partner's reputation, the company has the right to reject cooperation.

Contracts will include anti-corruption clauses to ensure that both parties comply with the integrity requirements.

BUSINESS HOSPITALITY POLICY AND PROCEDURES. GIFTS

Boryspil International Airport SE Policy on Business Hospitality and Gifts is based on the requirements of the law and the principles of integrity. It is forbidden to offer or accept gifts and favours that may be perceived as an attempt to influence decisions or gain advantages.

Hospitality is permitted only if it is appropriate, open, not excessive, in line with generally accepted practices and does not violate the law. Monetary gifts or equivalents are permitted only to the extent permitted by anti-corruption legislation.

In case of any doubt, employees are to consult the Commissioner for clarification. The fact of receiving or providing a gift or hospitality must be reported within one business day



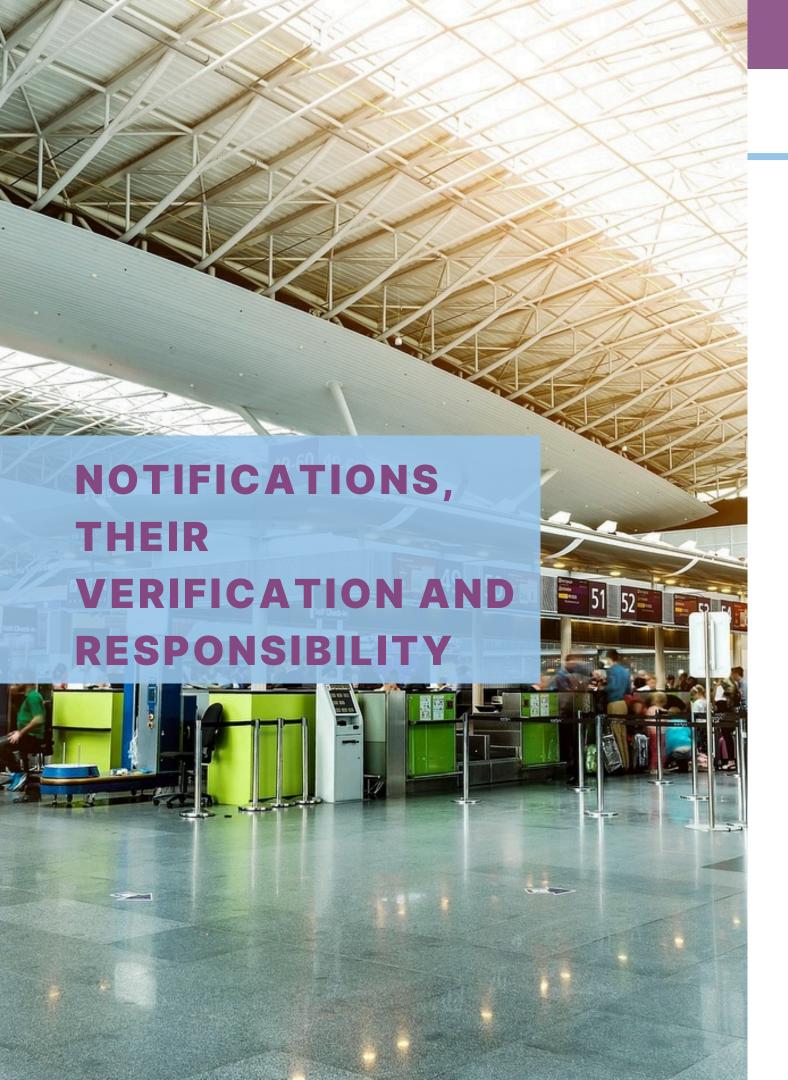


CHARITY AND SPONSORSHIP ACTIVITIES, SUPPORT OF POLITICAL PARTIES

Boryspil International Airport is not a sponsorship or charitable organisation and is not engaged in sponsorship activities. At the same time, in accordance with the Charter, the enterprise has the right to accept charitable contributions and donations from organisations, companies or individuals. Any assistance to the enterprise may be provided only in cases stipulated by law and it must not bear any features of sponsorship, political support or create a conflict of interest. Any decision to donate property or funds must be justified, legally verified, approved by the authorised management bodies and supported by a risk assessment and control of the intended use. Data on sponsorship activities is stored for at least 5 years. The Airport is not a charitable organisation and does not support political parties in accordance with the current legislation.

DUE DILIGENCE IN M&A TRANSACTIONS

When planning and implementing mergers and acquisitions, Boryspil International Airport SE conducts anti-corruption due diligence of the potential transaction object to identify risks and verify compliance with anti-corruption legislation. The check is carried out both before and after the completion of the transaction, and its scope depends on the level of risks. The ownership structure, business reputation, anti-corruption control system, relationships with public officials, possible sanctions, and internal policies are examined. The results are considered when making decisions. After a merger or acquisition, analisys of the anti-corruption measures compliance is carried out. If corruption is revealed, measures are taken to stop it and prevent its recurrence

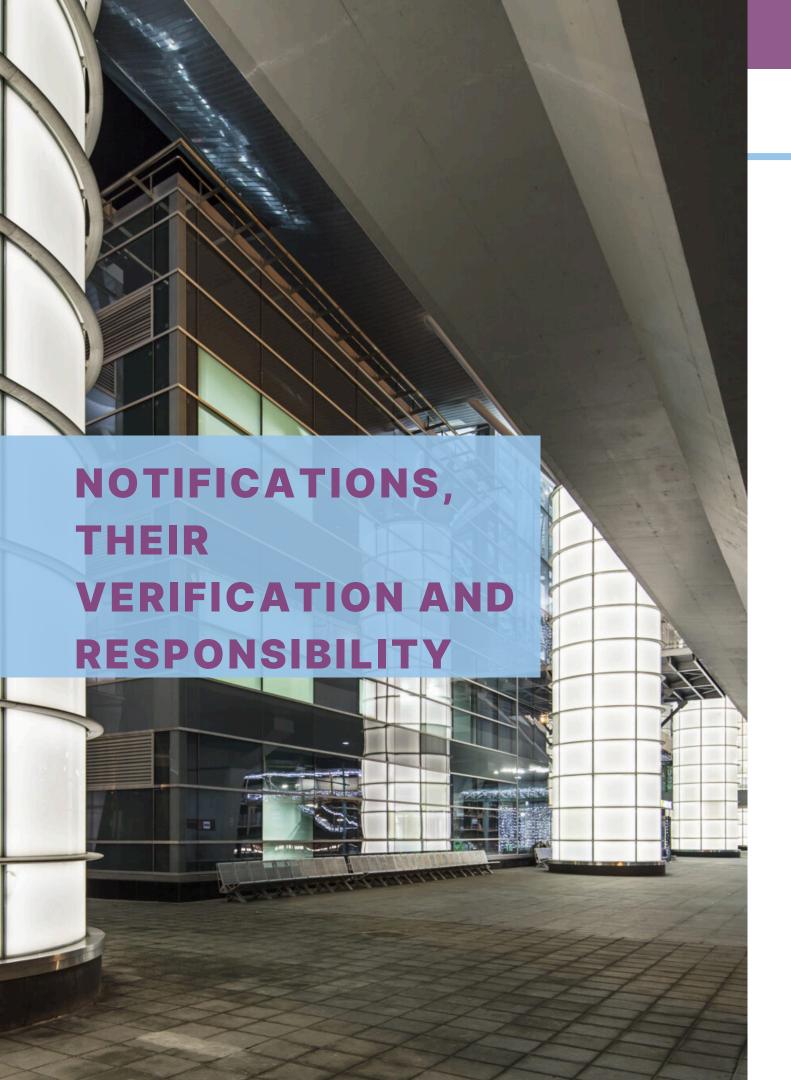




Boryspil International Airport provides favourable conditions for whistleblowers by maintaining confidentiality and creating a culture of respect for their role. The company ensures anonymous reporting channels, internal procedures for their processing, as well as counselling and methodological support. Reports can be made by name or anonymously but must contain verifiable information about violations of anti-corruption legislation. Employees, business partners and other people are encouraged to report corruption. Encouragement includes moral and material incentives, and a culture of reporting is supported by training, internal documents and communication activities.

Disclosure of corruption at Boryspil International Airport is recognised as an honourable right of employees, accompanied by the full range of rights and guarantees of protection provided by law. Whistleblowers have the right to confidentiality, protection from legal and property liability, information on the consideration of the report and non-discrimination. Their rights arise from the moment they submit verifiable information about a violation. It is prohibited to disclose their data or take any negative actions. The management, the Commissioner and designated employees are to ensure secure conditions for whistleblowers and their close associates.

Employees, trainees, representatives and business partners of Boryspil International Airport may report signs of violations of the Anti-Corruption Programme, facts of incitement to corruption or other violations of the law through the Unified Whistleblower Reporting Portal, directly to the CEO of Boryspil International Airport, the Commissioner or by e-mail <code>anticor@kbp.aero</code> and the hotline +38 (044) 281-73-28. Confidentiality of the applicant and protection of his/her rights are guaranteed in accordance with the internal procedures of the enterprise.





In the event of reports of possible corruption or corruption-related violations, the Commissioner conducts a preliminary review of the information received. If the violation concerns the Head of the enterprise, the information is forwarded to the Supervisory Board or management body. In case of confirmation of the facts or the necessity to clarify them, an internal investigation is appointed by a special commission (at that the participation of the Commissioner is mandatory, unless it is an investigation against him/her). Employees are obliged to facilitate the investigation, provide documents, and may be temporarily suspended if necessary. Upon the results of the investigation, decisions are made to terminate the violation, to impose disciplinary sanctions, to eliminate the consequences, to prevent recurrence and to transfer the materials to law enforcement agencies. The investigation period is up to 30 days with the possibility of extension up to 45 days. The Commissioner has permanent access to materials that are archived for at least 5 years.

Violation of the anti-corruption programme entails disciplinary liability of Boryspil International Airport SE employees in accordance with the labour legislation and internal regulations of the enterprise. In the event of a corruption violation, copies of the relevant orders and supporting documents are to be submitted to the NAPC for entering information into the Unified State Register of Persons Who Committed Corruption Violations. The head of the enterprise is required to ensure an appropriate response to such cases.





The CEO of Boryspil International Airport sets the tone from the top, ensuring the support of feedback processes and continuous improvement of the anti-corruption programme. The programme has to be reviewed following the results of corruption risk assessment, monitoring, changes in legislation or the enterprise structure.

The Commissioner is responsible for continuous monitoring of compliance with the Programme by all employees, management and representatives of the company. He or she responds to reports, checks employees' activities and documents for corruption risks, and monitors the implementation of the Programme. In case of detecting signs of violations, he/she initiates an investigation.

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Changes can be initiated by the Commissioner, the management, employees or the Supervisory Board. Proposals are collected and analysed by the Commissioner, who submits a generalised report to the CEO every year. After that, an open discussion is held by the staff. In case of urgent need, the discussion is initiated within 10 days. Accepted changes are approved by an order of the CEO and become part of the Programme. At the same time, the changes cannot lower the standards prescribed by law.

