



NGO
«UKRAINIAN NUCLEAR SOCIETY»

(«UKRNS»)

**CODE OF CONDUCT AND OPERATING POLICIES OF THE
NGO "UKRAINIAN NUCLEAR SOCIETY"**

Introduction and Scope

This comprehensive document establishes the fundamental ethical standards and operational procedures governing the Non-Governmental Organization "Ukrainian Nuclear Society" (hereinafter – the Organization or UkrNS). The policies are developed taking into account the requirements of the national legislation of Ukraine and the best international compliance practices (in particular, the requirements of international donors such as USAID, the European Commission, etc.).

The provisions of this document apply to all Board members, staff members, expert consultants, volunteers, as well as partners and sub-grantees acting on behalf of or with the financial support of UkrNS.

1. Code of Ethics and Professional Conduct

1.1. Basic Principles

The Organization operates on the principles of transparency, political impartiality, respect for human rights, and professionalism. Any actions that contradict the Organization's mission or may harm its business reputation are unacceptable.

1.2. Conflict of Interest

A conflict of interest arises when an employee's personal, family, or financial interests may affect their objectivity in the performance of their official duties. All employees are obliged to:

- Avoid situations that create an actual or potential conflict of interest.
- Immediately notify the management (in writing) of any circumstances that could be interpreted as a conflict of interest before related decisions are made (for example, before voting for a contractor if they are a relative).
- Refrain from participating in decision-making on matters in which they have a personal interest.

1.3. Gifts and Hospitality

Employees are prohibited from demanding or accepting gifts, funds, services, or other benefits from contractors, partners, or beneficiaries if this may influence the making of

business decisions. It is allowed to accept only souvenir products (pens, notebooks, calendars) and symbolic gifts, the value of which does not exceed the limit established by the legislation of Ukraine. All received corporate gifts are subject to registration.

2. Duty of Care and Occupational Health and Safety

2.1. Safe Working Environment

UkrNS is responsible for creating safe and healthy working conditions for its personnel. The Organization ensures compliance with sanitary and hygienic norms, fire safety rules, and occupational health and safety standards in office premises and during off-site events.

2.2. Actions under Martial Law and Emergencies

Given the security risks in Ukraine, the Organization implements the following mandatory protocols:

- In the event of an "Air Raid Alert" signal, all employees and event participants must immediately move to the nearest shelter. Work and events are suspended until the "All clear" signal.
- It is prohibited to hold offline events in premises that do not have access to an equipped bomb shelter or a safe haven within a 500-meter radius.
- Employees are granted the right to a flexible schedule or remote work in case of an immediate threat to life and health at their location.

3. Anti-Discrimination, Anti-Bullying, and Anti-Harassment Policy

3.1. Zero Tolerance

UkrNS strictly prohibits any forms of discrimination based on race, skin color, gender, religion, age, national origin, disability, or sexual orientation. Bullying, psychological pressure, mobbing, and sexual harassment in the workplace are gross violations of this Code.

3.2. Response Mechanism

Any employee or partner who has witnessed or been a victim of harassment must report it to the organization's management or the Supervisory Board through confidential channels. The Organization guarantees an objective investigation of each incident with full confidentiality and ensuring the applicant's protection from retaliation (reprisals). Confirmed violations are subject to disciplinary action, up to and including dismissal or termination of the contract.

4. Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT)

UkrNS takes exhaustive measures to ensure that donor funds are not used to support terrorist or illegal activities.

- **Mandatory Screening:** Prior to entering into any cooperation agreement, sub-grant, or procurement (for an amount exceeding the established internal limit), the Financial Manager screens the counterparty against official sanctions lists: the National Security and Defense Council (NSDC) of Ukraine lists, the European Union Consolidated List, OFAC (USA) lists, and UN lists.
- **Transaction Monitoring:** All financial transactions are carried out exclusively through official bank accounts. Cash settlements are minimized and strictly regulated.

5. Data Protection and Cybersecurity

5.1. Confidentiality and Personal Data Protection

The collection, processing, and storage of personal data is carried out exclusively on the basis of the voluntary consent of the data subject, in accordance with the Law of Ukraine "On Personal Data Protection" and taking into account GDPR principles. Data is used only for the purposes for which it was collected and is stored for the minimum necessary period. Access to personal data is granted exclusively to authorized personnel.

5.2. Cyber Hygiene Rules

To protect corporate information, the following requirements are established:

- It is prohibited to transfer corporate logins, passwords, or electronic keys to third parties.
- Licensed software and up-to-date antivirus databases must be installed on all work computers and servers.
- Employees must use two-factor authentication (2FA) to access corporate email and cloud storage.
- The use of open (public) Wi-Fi networks to access the financial or confidential systems of the Organization is prohibited.

6. Risk Management

UkrNS applies a systematic approach to risk management, which allows for the timely identification and mitigation of threats to project implementation. Management is carried out in the following areas:

Risk Type	Description	Mitigation Measures
Financial	Exchange rate fluctuations, misuse of funds, inflation.	Dual authorization of payments, regular budget monitoring, verification of partner reports before payment.
Operational / Security	Disruption of events due to military actions, power outages.	Availability of backup locations with shelters, providing the office with

		generators and Starlink, moving events to an online format.
Reputational	Scandals involving partners, dissemination of false information.	Due Diligence of partners, continuous monitoring of the information space, approval of communication materials.

7. Corporate Travel Policy

This policy regulates the procedure for processing and reimbursing expenses during business trips of employees.

- **Approval:** All business trips must be previously justified and approved in writing by the Project Manager.
- **Travel Reimbursement:** The cost of travel by rail (compartment / Intercity 2nd class) or bus is reimbursed. The use of air flights or taxis is allowed only in exceptional cases subject to separate approval.
- **Accommodation and Per Diems:** Reimbursement of hotel expenses and payment of per diems are strictly within the limits approved by the internal order (or set by the donor), based on the provided fiscal receipts, invoices, and acts.
- **Reporting:** The employee is obliged to submit an advance report and all original supporting documents to the accounting department within 5 working days after returning from the business trip.

8. Environmental and Social Impact

UkrNS, as an organization related to the energy sector, is aware of its responsibility to the environment and society and implements the principles of sustainable development:

- **"Green Office":** Minimizing paper use through the implementation of electronic document management, sorting office waste, energy-efficient use of lighting and equipment.
- **Green Procurement:** When choosing suppliers, preference is given to companies that use environmentally friendly technologies or offer products from recycled materials.
- **Social Responsibility:** The Organization is committed to promoting inclusivity. Organization events should, whenever possible, be held in locations accessible to persons with disabilities.

APPENDIX: Declaration of Familiarization

DECLARATION OF FAMILIARIZATION AND COMPLIANCE WITH POLICIES

I, _____ (Full Name),
holding the position / fulfilling the role of _____
in the NGO "Ukrainian Nuclear Society", hereby confirm that:

- 1. I have carefully read and understood the "Code of Conduct and Operating Policies of the NGO UkrNS".
- 2. I undertake to strictly adhere to all the stated norms, including anti-corruption requirements, cybersecurity rules, and measures to prevent discrimination.
- 3. I understand that violation of these policies may lead to disciplinary action, termination of cooperation, or other liability under the law.

Date: " __ " _____ 20__

Signature: _____