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## CODE OF CONDUCT

<b>Document</b>	Code of Conduct
<b>Organization</b>	Non-Governmental Organization "International Anti-Corruption Assembly" (NGO "IACA")
<b>Version</b>	7.0
<b>Approved</b>	February 25, 2026
<b>Approved by</b>	Secretary General of the Central Committee of NGO "IACA"
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## **1. General Provisions**

This Code of Conduct of the Non-Governmental Organization “International Anti-Corruption Assembly” (hereinafter referred to as the “Organization” or “IACA”) establishes unified ethical standards, rules of conduct, and values that all persons associated with the activities of the Organization are required to observe.

The Code is a key element of the Organization’s integrity management system and serves as the foundation of its organizational culture. It reflects the Organization’s mission of combating corruption and promoting integrity at both national and international levels.

This Code has been developed in accordance with:

- The Charter of the Organization (2019 revised edition approved by the General Assembly);
- The legislation of Ukraine (including the Law of Ukraine “On Prevention of Corruption”, the Law of Ukraine “On Public Associations”, and other applicable laws);
- The United Nations Convention against Corruption (UNCAC), in particular Article 13;
- International standards (ISO 37001, recommendations of Transparency International, OECD, the UN Global Compact, and PSEA — Protection from Sexual Exploitation and Abuse principles);
- The United Nations Sustainable Development Goals (particularly SDG 16);
- The Independence-First Principle, ensuring the Organization’s independence and integrity.

## **2. Purpose of the Code**

- To establish unified high ethical standards of conduct;
- To maintain the Organization’s reputation as a reliable, transparent, and integrity-driven international partner;
- To prevent misconduct, corruption, fraud, conflicts of interest, and abuse;
- To create a safe, inclusive, respectful, and professional environment;
- To support the Organization’s hybrid operating model while preserving the Independence-First Principle;
- To strengthen the trust of partners, donors, beneficiaries, and society.

## **3. Scope of Application**

This Code is mandatory for all persons associated with the Organization without exception, regardless of their country of residence, nationality, or form of engagement, including:

- Members of the General Assembly, the Central Committee, and the Audit Commission;
- The General Secretary;
- Employees (both staff and non-staff personnel), volunteers, and interns;
- Heads and members of Separate Subdivisions and Representative Offices (Clause 1.16 of the Charter);
- Consultants, experts, contractors, and partner organizations participating in joint projects.

## **4. Core Values of the Organization**

- Integrity and zero tolerance for corruption and fraud;
- Transparency, accountability, and independence (Independence-First);
- Respect for the dignity, rights, and freedoms of every individual;
- Protection of human rights, particularly those of children, vulnerable groups, and whistleblowers;
- Professionalism, responsibility, and effectiveness;
- Independence and objectivity;
- Inclusion, non-discrimination, and equality;
- International cooperation and solidarity in combating corruption.

## **5. Standards of Conduct**

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Every person covered by this Code shall:

- 5.1. Comply with the applicable legislation of Ukraine, the legislation of countries where projects are implemented, and the Organization's international obligations.
- 5.2. Avoid all forms of corruption, fraud, abuse of authority, or misuse of resources.
- 5.3. Comply with the principles of Protection from Sexual Exploitation and Abuse (PSEA).
- 5.4. Ensure full protection of children and vulnerable groups in all activities.
- 5.5. Promptly disclose and avoid any conflict of interest, whether actual, potential, or perceived.
- 5.6. Treat colleagues, volunteers, beneficiaries, partners, and members of the public with respect and refrain from any form of discrimination, harassment, or bullying.
- 5.7. Maintain the confidentiality of information in accordance with the Data Protection and Privacy Policy.
- 5.8. Use the Organization's resources (financial, material, and informational) exclusively for achieving its statutory objectives.
- 5.9. Maintain high standards of professional communication, particularly in international environments.
- 5.10. Act honestly and in good faith in all situations while representing the interests of the Organization.

## **6. Responsibilities**

Every person covered by this Code shall:

- Familiarize themselves with this Code and all related policies;
- Comply with them in their daily activities and while representing the Organization;
- Actively promote adherence to ethical standards;
- Immediately report any violations in accordance with the Whistleblowing and Whistleblower Protection Mechanism.

## **7. Violations of the Code and Corrective Measures**

Violations of this Code may result in disciplinary measures proportionate to the severity of the violation, including:

- Warning;
- Removal from duties;
- Temporary suspension;
- Termination of membership (Clauses 4.9–4.10 of the Charter);
- Termination of employment, civil-law, or other contractual relationships;
- Referral to law enforcement authorities where a legal offence has been committed.

## **8. Related Documents**

This Code forms part of the Organization's integrated system of internal policies and is linked to:

- Anti-Corruption Policy;
- Anti-Fraud Policy;
- Protection from Sexual Exploitation and Abuse (PSEA) Policy;
- Child Safeguarding Policy;
- Conflict of Interest Policy;
- Whistleblowing and Whistleblower Protection Policy.

## **9. Final Provisions**

This Code of Conduct shall enter into force on 25 February 2026 and shall form an integral part of the Organization's internal governance system.

The Code shall be reviewed at least once every two years or whenever significant changes occur in legislation, international standards, or the Organization's activities.

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All new members, employees, volunteers, and partners are required to familiarize themselves with this Code and confirm their commitment to comply with it in writing.

**Approved by:**

General Secretary of the Central Committee  
NGO "International Anti-Corruption Assembly"



Viacheslav Sayenko