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ANTI-CORRUPTION POLICY

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Organization	Non-Governmental Organization "International Anti-Corruption Assembly" (NGO "IACA")
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Approved by	Secretary General of the Central Committee of NGO "IACA"
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1. General Provisions

The Non-Governmental Organization “International Anti-Corruption Assembly” (hereinafter referred to as the Organization or NGO “IACA”) adheres to the principle of zero tolerance towards any manifestations of corruption, bribery, abuse of power, favoritism, fraud, unethical behavior, and other forms of dishonesty.

This Policy establishes internal rules, control mechanisms, and response procedures aimed at preventing corruption risks, ensuring transparency, accountability, integrity, and protecting the Organization’s reputation as an international anti-corruption entity.

The Policy has been developed in accordance with the Charter of the Organization, the legislation of Ukraine as the country of registration of the Organization (Law of Ukraine “On Prevention of Corruption”, Law of Ukraine “On Public Associations”, and others), the United Nations Convention against Corruption (UNCAC), in particular Article 13 (participation of society), generally recognized principles and norms of international law, international standards (ISO 37001:2016 “Anti-bribery management systems”, recommendations of Transparency International, OECD, USAID), standards of integrity and good governance, requirements of international donors and partners, as well as the legislation of the states in whose territory the Organization carries out its activities or implements projects.

The Organization operates on the principles of legality, integrity, independence (Independence-First), transparency, accountability, voluntariness, personal responsibility, and the absence of proprietary interest of members (clauses 1.9–1.10 of the Charter).

2. Purpose of the Policy

- Prevention of corruption and abuse of power;
- Ensuring honest, transparent, and accountable management;
- Prevention of conflicts of interest;
- Protection of the Organization’s resources, grant, charitable, and membership funds;
- Creation of an effective mechanism for reporting violations and protection of whistleblowers;
- Protection of persons who in good faith report violations;
- Maintenance of trust of partners, donors, beneficiaries, and society;
- Support for the implementation of the United Nations Sustainable Development Goals (in particular 16.5, 16.6, 16.10) and Article 13 of UNCAC.

3. Scope of Application

This Policy applies to all areas of the Organization’s activities regardless of the country of implementation and is mandatory for:

- Members of the General Meeting;
- Members of the Central Committee;
- Members of the Audit Commission;
- Secretary General;
- Employees (including staff);
- Volunteers and interns;
- Consultants, experts, and contractors;
- Representatives of separate subdivisions and representative offices (clause 1.16 of the Charter);
- Partner organizations within joint projects;
- All persons acting on behalf of the Organization or representing its interests.

4. Definition of Corruption

Corruption means the use of official position, powers, resources, information, or influence of the Organization to obtain unlawful benefits for oneself or third parties (in accordance with the Law of Ukraine “On Prevention of Corruption” and UNCAC).

Corruption manifestations include, in particular:

- Bribery (active and passive);
- Offering/receiving unlawful benefits;
- Kickbacks and hidden rewards;
- Favoritism and nepotism;
- Abuse of power;
- Concealment of conflicts of interest;
- Manipulation of procurements or tender procedures;
- Misuse of the Organization's property, funds, or grants;
- Falsification of documents and reporting;
- Any other actions that contradict the principles of integrity and legality.

5. Core Principles

- Integrity, transparency, accountability, and independence;
- Zero tolerance for any forms of corruption;
- Independence-First — priority of preserving expert independence even in the case of targeted grants;
- Personal responsibility of each person for their own actions and decisions (clause 4.5.2 of the Charter);
- Prevention of conflicts of interest;
- Protection of whistleblowers and beneficiaries;
- Equality, non-discrimination, and impartiality in decision-making;
- Compliance with national and international legal requirements;
- Ensuring proper internal control and risk management.

6. Prohibited Actions

The Organization categorically prohibits:

- Offering, promising, soliciting, or receiving bribes or other unlawful benefits;
- Use of the Organization's status, resources, information, or name for personal interests;
- Favoritism in procurements, decision-making, personnel processes, or distribution of assistance;
- Concealment of conflicts of interest;
- Misuse of grant, charitable, or membership funds;
- Falsification of documents, reporting, or financial data;
- Obstruction of inspections, audits, or internal investigations;
- Retaliation against persons who in good faith reported violations;
- Any actions that may harm the Organization's reputation or undermine trust in it.

7. Conflict of Interest

All persons to whom this Policy applies are obliged to:

- Immediately report any actual, potential, or perceived conflict of interest;
- Recuse themselves from participation in decision-making in the presence of a conflict of interest;
- Declare conflicts of interest in accordance with the procedure established by the Organization;
- Comply with the requirements of the Conflict of Interest Policy.

8. Gifts and Hospitality

Only symbolic manifestations of business courtesy are permitted, provided that they:

- Do not influence the objectivity of decision-making;
- Do not create actual or potential obligations;
- Cannot be perceived as an attempt to influence a decision or obtain advantages.

Any gifts, rewards, or other benefits that may create a risk of conflict of interest or corruption are prohibited.

9. Transparency of Procurement and Use of Funds

All procurements, financial transactions, and expenses are carried out in accordance with the principles of transparency, substantiation, accountability, cost-effectiveness, non-discrimination, and absence of conflict of interest in line with the Financial Procedures, Procurement Policy, and other internal documents of the Organization.

The Organization ensures proper control over the use of financial resources regardless of the source of funding or the country of project implementation.

10. Mechanism for Reporting Violations

Reports of corruption violations, suspicions, or risks may be submitted by any person regardless of their status, citizenship, or place of residence through:

- Email: antifraud@iacassembly.org;
- The Secretary General: chief@iacassembly.org;
- An authorized person or body designated by internal procedures;
- Anonymous or confidential reporting channels.

The Organization ensures confidentiality, impartiality, objective consideration, and protection from any forms of retaliation or revenge against persons who in good faith reported violations (in accordance with UNCAC and national legislation).

11. Enforcement Measures

In the event of confirmation of a violation, the Organization may apply one or more of the following measures:

- Warning;
- Removal from performance of duties;
- Temporary suspension from participation in projects or activities of the Organization;
- Termination of membership (clauses 4.9–4.10 of the Charter);
- Termination of employment, civil-law, or other agreements;
- Compensation for damages caused;
- Informing donors or partners in cases provided for by law or contractual obligations;
- Referral to law enforcement or other competent authorities.

12. Final Provisions

This Policy enters into force on February 25, 2026, and is mandatory for all persons to whom it applies.

The Policy is reviewed at least once every two years, as well as in the event of changes in the legislation of Ukraine, applicable international legislation and standards, donor requirements, the Organization's structure, geography of its activities, or other circumstances that may affect the system for preventing corruption and ensuring integrity.

Approved by:

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



Viacheslav Sayenko