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PROCUREMENT POLICY

Document	Procurement Policy
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”) ensures transparency, efficiency, integrity, and legality of all procurements of goods, works, and services.

The Organization carries out its activities in Ukraine and in 15 countries around the world, has international partners, and plans further expansion of international cooperation. This Policy defines the principles, procedures, and control mechanisms for procurement activities. It has been developed in accordance with the Charter of the Organization, the legislation of Ukraine (as the country of registration), generally recognized principles and norms of international law, the United Nations Convention against Corruption (UNCAC), international standards for non-governmental organizations, requirements of international donors (UN, EU, USAID, and others), as well as the national legislation of the countries in whose territory the Organization implements projects, maintains representative offices, volunteers, contractors, or suppliers.

The Organization ensures that procurements are carried out in compliance with the principles of fair competition, non-discrimination, equal treatment of suppliers, prevention of corruption, financial abuse, money laundering, and other offenses.

2. Purpose of the Policy

- Ensuring transparent, competitive, and efficient use of the Organization’s resources;
- Prevention of corruption, conflicts of interest, and abuse in procurement;
- Efficient expenditure of grant, membership, and other funds;
- Support for the Independence-First approach when working with targeted grants;
- Ensuring that procurements are consistent with the Organization’s mission.

3. Scope of Application

This Policy applies to all procurements of goods, works, and services carried out by the Organization regardless of the source of funding, country of project implementation, or place of procurement, and is mandatory for all participants in the process:

- Secretary General;
- Members of the Central Committee;
- Employees (including staff from 2026);
- Volunteers;
- Heads of separate subdivisions and representative offices;
- Contractors and other authorized persons involved in procurement processes.

4. Core Principles of Procurement

- Transparency and openness;
- Competitiveness and equal treatment of suppliers;
- Cost-effectiveness and efficiency in the use of funds;
- Prevention of conflicts of interest;
- Proportionality of procedures to the scale and value of the procurement;
- Documentation of all stages;
- Compliance with applicable national legislation and international standards;
- Non-discrimination of suppliers based on country of origin (except for sanctions restrictions or donor requirements);
- Proper due diligence of counterparties for compliance with anti-corruption standards.

5. Thresholds and Procurement Procedures

5.1. Procurements up to UAH 50,000 — simplified procedure (1–2 proposals).

5.2. Procurements from UAH 50,000 to UAH 200,000 — collection of at least 3 commercial

proposals.

5.3. Procurements exceeding UAH 200,000 — formal competition or tender with mandatory approval by the Central Committee.

In the case of implementation of international projects funded by donors or partners, the Organization applies additional procurement requirements stipulated in the relevant grant agreements, contracts, donor policies, or international standards.

If the donor's requirements or the applicable legislation of the project implementation country are stricter than the requirements of this Policy, the stricter requirements shall apply.

6. Conflict of Interest

All participants in the procurement process are obliged to:

- Declare any actual, potential, or perceived conflict of interest;
- Recuse themselves from participation in the procurement in the event of a conflict of interest (see the Conflict of Interest Policy);
- Not use their official position or insider information to obtain personal benefit or benefit for third parties;
- Comply with the requirements of the Organization's Conflict of Interest Policy and Anti-Corruption Policy.

7. Responsibilities

7.1 Secretary General

Approves procurements exceeding the established thresholds, signs contracts, and ensures overall control over compliance with this Policy.

7.2 Procurement Initiator

Prepares justification of the need, technical specifications, collects proposals, and ensures proper documentation of the process.

7.3 Audit Commission

Carries out periodic control of Policy compliance and may conduct selective audits of procurements.

7.4 All participants

Are obliged to act with integrity, comply with the requirements of this Policy, and report any known violations.

8. Documentation and Retention

All documents related to procurements (requests for proposals, commercial proposals, evaluation protocols, contracts, acceptance certificates, invoices, payment documents, and other supporting materials) shall be retained for at least 5 years in accordance with the Organization's Financial Procedures or longer if required by legislation, grant agreement terms, or donor requirements.

Documents related to international projects must be available for internal and external audit in accordance with the Organization's contractual obligations.

9. Related Documents

- Anti-Fraud Policy;
- Anti-Corruption Policy;
- Conflict of Interest Policy;
- Financial Procedures;
- Segregation of Financial Duties.

10. Final Provisions

This Policy enters into force on February 25, 2026.

The Policy is reviewed 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 procurement and control system.

Approved by:

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



Viacheslav Sayenko