



UKRAINE
NGO «INTERNATIONAL ANTI-CORRUPTION ASSEMBLY»
Legal entity identification code 40030266,
15/3, E. Konovalets str., Kyiv, 03150
tel. num.: +38 068 843 65 93; +38 050 843 90 83
e-mail: info@iacasembly.org, <http://www.iacasembly.org>

WHISTLEBLOWER POLICY

Document	Whistleblower Policy
Organization	Non-Governmental Organization “International Anti-Corruption Assembly” (NGO “IACA”)
Version	7.0
Approved	February 25, 2026
Approved by	Secretary General of the Central Committee of NGO “IACA”
Contact for reports	iaca@iacasembly.org

Legal Entity Identification Code (EIDRPOU): 40030266
Registration Certificate No. 1448234 dated 24 September 2015

12-A Zhylianska Street, Office 101, Kyiv 01033, Ukraine
www.iacasembly.org/en/ | info@iacasembly.org

1. General Provisions

The Non-Governmental Organization “International Anti-Corruption Assembly” (hereinafter referred to as the Organization or NGO “IACA”) encourages open reporting of any violations, deficiencies, or suspicious activities and ensures reliable protection for persons who in good faith report such facts (whistleblowers).

This Policy defines mechanisms for safe reporting of violations, procedures for their consideration, and guarantees for the protection of whistleblowers. It has been developed in accordance with the Charter of the Organization, the Law of Ukraine “On Prevention of Corruption”, the United Nations Convention against Corruption (UNCAC, Article 33), Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, international best practices (Transparency International, UN, USAID), other internal policies of the Organization, as well as the legislation of the countries in which the Organization operates. The mechanism ensures a universal level of protection for Ukrainian and foreign volunteers, employees, and partners.

2. Purpose of the Policy

- Creation of a safe and accessible mechanism for reporting violations;
- Ensuring effective and confidential consideration of reports;
- Reliable protection of whistleblowers from any forms of retaliation or negative consequences;
- Prevention and detection of violations of internal policies, legislation, and ethical standards;
- Enhancement of transparency and accountability in the Organization’s activities.

3. Scope of Application

The Policy applies to all persons associated with the Organization:

- Members of the General Meeting, Central Committee, and Audit Commission;
- Secretary General;
- Employees (including staff from 2026), volunteers, interns;
- Consultants, contractors, partners, and beneficiaries.

4. Definitions

Whistleblower - a person who in good faith reports or provides evidence of violations of legislation, the Charter, the Organization’s internal policies, or ethical standards.

Retaliation - any negative actions (dismissal, pressure, discrimination, threats, worsening of conditions, etc.) against a whistleblower.

Violation - any actions or omissions that contradict the Charter, internal policies, anti-corruption legislation, PSEA, child protection, etc.

5. Core Principles

- Protection of whistleblowers (non-retaliation);
- Guarantee of confidentiality and the possibility of anonymous reporting (if desired);
- Prohibition of retaliation in any form;
- Impartiality and promptness of consideration;
- Zero tolerance for the persecution of whistleblowers;
- Proportionality of procedures to the scale of the hybrid volunteer-staff model;
- Universality - protection applies regardless of the whistleblower’s country of residence;
- Support for the whistleblower (legal, psychological, if necessary).

6. Reporting Mechanism

Reports may be submitted:

- By email: iaca@iacassembly.org (marked “Whistleblower”);
- Directly to the Secretary General: chief@iacassembly.org;

- Anonymously (without indicating personal data);

Through special channels provided for in the Anti-Fraud Policy or Safeguarding Reporting Procedures.

7. Procedure for Consideration of Reports

- Confirmation of receipt - within 5 working days (if not anonymous);
- Preliminary assessment - up to 10 working days;
- Full investigation (if necessary) - with the involvement of the Audit Commission or external experts;
- Decision-making and application of measures;
- Provision of feedback to the whistleblower (within the limits of confidentiality);
- Monitoring of the situation to prevent retaliation.

8. Protection of Whistleblowers

The Organization prohibits and holds accountable any retaliatory actions against a whistleblower. The Organization guarantees that the whistleblower will not suffer any negative consequences (dismissal, persecution, pressure, discrimination).

9. Enforcement Measures

Any attempts at retaliation are considered a gross violation and entail liability. In case of confirmation of a violation - application of measures in accordance with the relevant policies (from warning to termination of cooperation and referral to law enforcement agencies).

10. Related Documents

- Anti-Fraud Policy;
- Anti-Corruption Policy;
- Policy on Protection from Sexual Exploitation and Abuse (PSEA);
- Child Safeguarding Policy;
- Safe Reporting Mechanism for Violations;
- Code of Conduct.

11. Final Provisions

This Policy enters into force on February 25, 2026. The Policy is reviewed at least once every two years. All employees, volunteers, and members of the Organization are obliged to familiarize themselves with it and confirm this in writing.

Approved by:

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



Viacheslav Sayenko