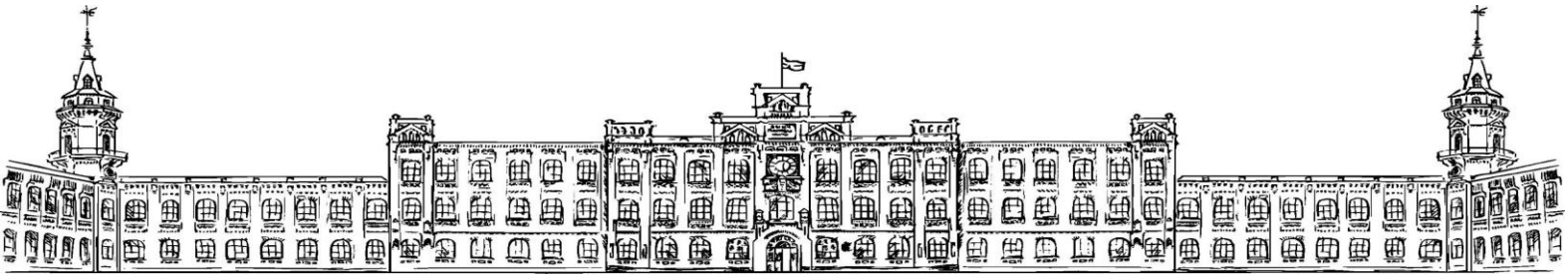
Annex 7
to the Order “On Approval of University Policies in the Context of Sustainable Development"

Igor Sikorsky Kyiv Polytechnic Institute’s Anti-Corruption Policy, Anti-Bribery Policy, and Integrity Development Policy

Approved by the Academic Council of Igor Sikorsky Kyiv Polytechnic Institute (Protocol No. 7 dated 09.09.2024)



Introduction

This policy demonstrates the processes of university development and confirmation of further steps in building a virtuous educational environment, which were declared by the Anti-Corruption Programme of the National Technical University of Ukraine 'Igor Sikorsky Kyiv Polytechnic Institute'[1] (hereinafter - the Anti-Corruption Programme). In line with its responsibility for the establishment of the fundamental values of the rule of law and uncompromising integrity, the Anti-Corruption Programme solemnly declares its unwavering commitment to ensure sustainable development. Maintain and enhance your excellent business reputation.

In line with the interests of an independent state, educational process participants, and business partners, the University declares that its rector, vice-rectors, heads of structural units, officials, and all staff will act with absolute intolerance toward corruption and bribery in any form or manifestation. This commitment applies to their activities and legal relations with business partners, public authorities, local governments, other legal entities, and individuals.

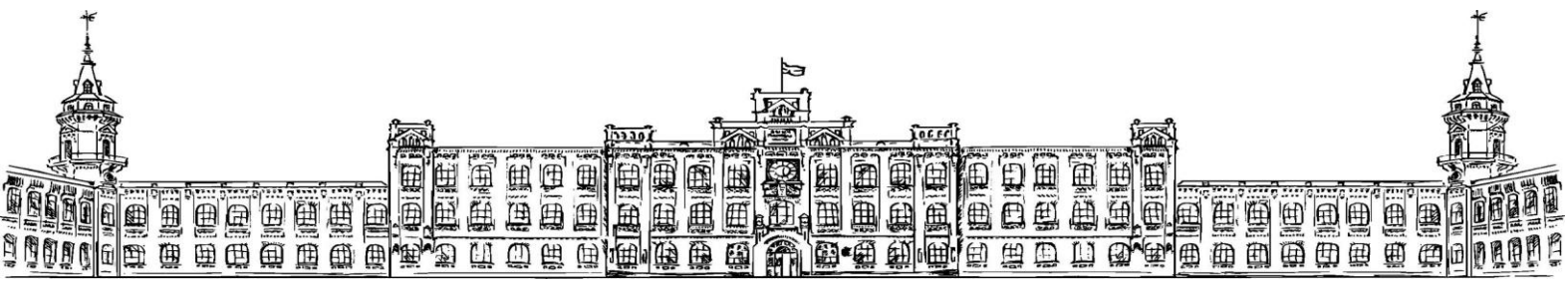
The University is committed to taking all necessary steps to prevent, detect and address any instances of corruption in line with applicable legislation and the Anti-Corruption Programme.

We firmly believe that corruption is an illegal, unethical and unacceptable practice in business and will be strongly condemned and eradicated at our institution.

We uphold the integrity of all participants in the educational process as a core value of the KPI community and the purpose of our University.

The staff and students of the University are committed to fostering an educational environment where integrity is not merely a matter of complying with established regulations, but rather a core value integrated into the entire educational process. It is our goal to ensure that every student, faculty member, and employee at the University feels valued, has their contribution acknowledged, and is part of a collective effort to establish an ethical, transparent, and responsible learning and working environment.

[1] Approved by order No. НУ/99/2023 dated 08.06.2023 "On approval of the Anti-Corruption Programme of Igor Sikorsky Kyiv Polytechnic Institute" and the decision of the Conference of the labour collective dated April 20, 2023



We consider integrity, ethics and mutual respect to be fundamental principles for successful learning and professional development.

We acknowledge that adherence to these principles extends beyond mere compliance with formal requirements. Rather, it is a more profound comprehension of accountability for our actions and the acknowledgement that we are all part of a larger community where honesty and transparency are essential for success and trust.

It is our intention to foster an environment of shared responsibility for the development of an ethical culture across the entire educational process. We are committed to playing an active role in this process. We view this process as an opportunity for both individual growth and the development of the university as a whole. The establishment of a university corporate culture, which will include a virtuous environment, requires consistent effort and constant attention. However, we believe that this is the only way to achieve high standards of academic and professional life.

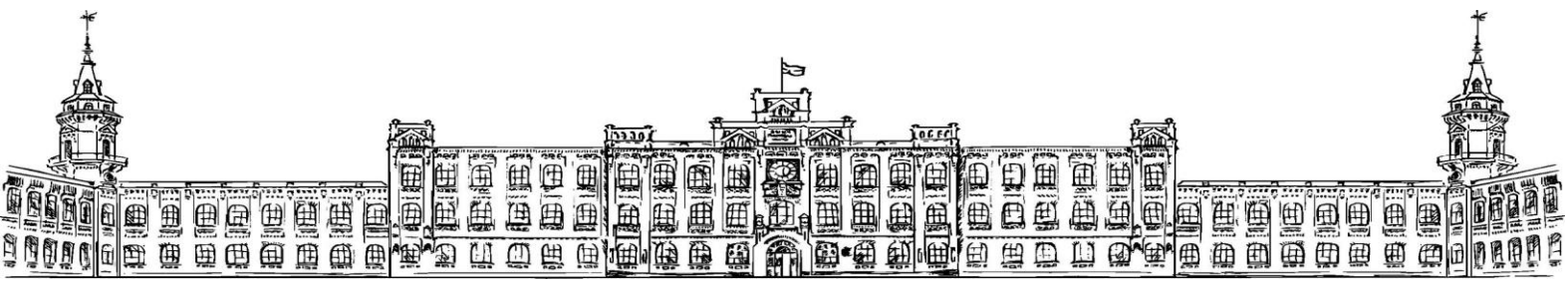
We are prepared to act responsibly and set an example of ethical standards in the educational process and in all aspects of our work. We believe that, collectively, we can make a significant contribution to creating a virtuous space where honesty and openness become the norm, and where each of us can realise our full potential.

The goal of the University's Anti-Corruption, Anti-Bribery and Integrity Policy is to foster and sustain an ethical business environment where honesty, transparency and responsibility are fundamental principles. The overarching goal of this policy is to prevent, detect and effectively address any form of corruption and bribery in all areas of the University's operation. It is also important to foster a culture of integrity among students, faculty and staff, which promotes ethical behaviour, respect for the law and adherence to generally accepted standards.

The primary objectives of the University's Anti-Corruption Policy, Anti-Bribery Policy and Integrity Development Policy are as follows:

1. The prevention of corruption and bribery through the implementation of an effective system of internal control, which ensures transparency in decision-making processes of, resource allocation and interactions with external parties.

2. Implementing the compliance system as a preventive measure against corruption and violations of the law.



3. Fostering an environment of integrity by promoting the principles of integrity in all aspects of the educational process and the management of the University. This will be achieved by encouraging good behaviour and ethical attitudes from all participants in the educational process.

4. Education and awareness through the organisation of regular training, seminars and information campaigns as an effective method of raising awareness among staff and students of the risks of corruption and methods of prevention.

5. Including an educational module on anti-corruption and integrity in all educational programmes and courses of the University.

6. Ensuring responsibility and accountability by establishing clear procedures for detecting, investigating and responding to instances of corruption and unethical behaviour. This will ensure that appropriate accountability for violations of rules and regulations is unavoidable.

7. Involving professional public representatives in the control and monitoring of the University's activities.

8. Identifying and assessing the risks of corruption in the University's activities and establish a risk management system.

9. Carrying out regular audits and inspections to identify violations and deficiencies in the management system.

10. Implementing a whistle-blower incentive policy and protecting the rights of whistle-blowers who report violations.

11. Collaborating with stakeholders to form alliances with anti-corruption organisations and civil society initiatives for the joint implementation of anti-corruption programmes.

12. Participation in national and international anti-corruption and integrity initiatives.

These objectives are designed to create a sustainable anti-corruption culture at the University that supports the development of an ethical environment and ensures high standards of performance.

The University's anti-corruption policy not only regulates the legal aspects of corruption prevention, but also promotes moral standards and ethical behaviour, which are key to the development of an integrity-based educational environment.

Key Principles of the Anti-Corruption Policy:

1. Responsible Leadership "Tone at the top". This is a deliberate pledge by the Rector by the Rector to implement an effective anti-corruption policy at the university and to continuously enhance it in line with the international standard ISO 37001:2016 Anti-bribery Management Systems.

2. Transparency is a core principle of our anti-corruption policy. Ensuring transparency in processes, financial transactions and decision-making across all areas of governance.

3. Controllability and accountability. There must be clear accountability mechanisms in place at all levels of the education process. It is recommended that independent professional working and advisory bodies or commissions be established to monitor, investigate and control corruption and bribery, as well as to consider appeals, reports and complaints. Develop and implement compliance systems to prevent corruption and bribery, as well as internal controls to detect and prevent such activities.

4. Risk management. It is essential that all processes within the organisation undergo regular professional risk assessment.

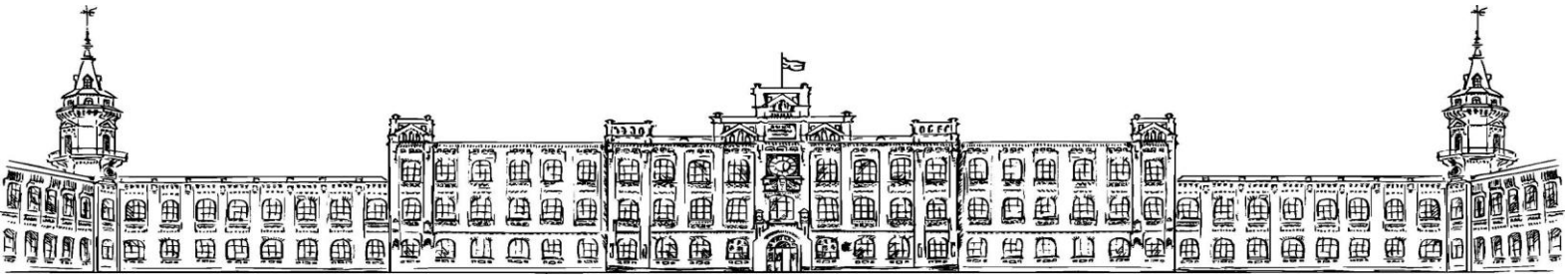
5. Professional standards must be maintained at all times. The recruitment of staff is conducted on a professional basis and in accordance with the relevant professional standards. All University employees are expected to adhere to the highest professional and ethical standards.

6. Prevention. Take all necessary steps to prevent corruption and bribery. This should include compliance and training, as well as transparent procedures for the submission and consideration of complaints and grievances.

7. The protection of individuals who report wrongdoing, also known as whistleblowing. It is essential to establish transparent and accessible procedures for reporting instances of bribery and corruption. Those who report such practices must be protected from any form of retaliation or pressure.

8. Monitoring and evaluation. Regularly review and evaluation of the anti-corruption policy and programme, and their constituent measures, in order to guarantee their continued effectiveness and relevance.

9. Education and training. It is essential to provide regular training to all personnel involved in the training process on the principles of ethics, integrity and anti-bribery.



10. Cooperation with law enforcement agencies. In collaboration with law enforcement agencies, investigate instances of bribery and corruption.

11. A culture of integrity and commitment at all levels. A culture of integrity must be created and maintained through communications, events and the promotion of high standards of ethics and integrity. There must be zero tolerance of bribery and corruption at all levels of university management. All levels of university management must be involved in the development and implementation of the integrity policy to ensure its effectiveness.

12. Motivation. The recognition and encouragement of individuals and groups who demonstrate high standards of integrity.

University Commitments to the Anti-Corruption Policy

1. The implementation of the Anti-Corruption Policy by developing and implementing comprehensive policies that cover all aspects of the University's activities. These policies will be aligned with the requirements of the international standard ISO 37001:2016 Anti-Bribery Management Systems.

2. Ensuring transparency in all University processes, including financial transactions, decision-making processes and management decisions.

3. The establishment of clear accountability mechanisms for all University employees, including complaint and enquiry mechanisms.

4. Create or maintain independent professional bodies or commissions responsible for monitoring and investigating cases of corruption and bribery.

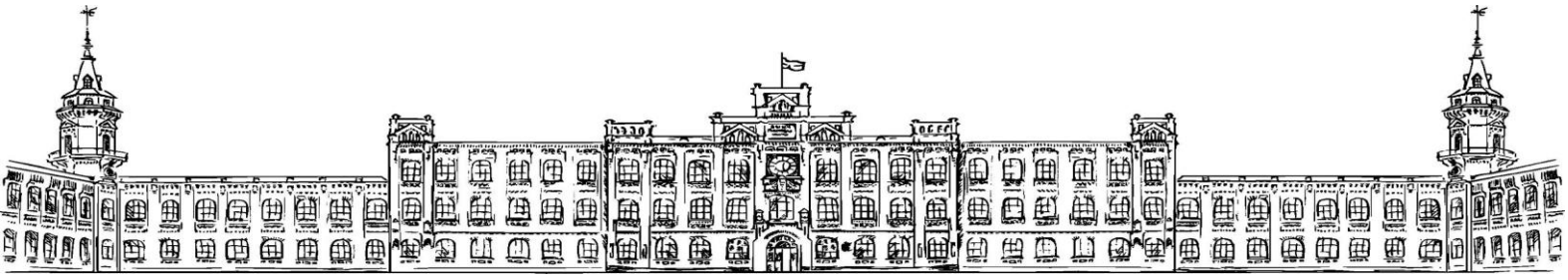
5. The establishment and maintenance of high ethical standards for all members of the university community.

6. Providing regular training which includes include ethics, integrity and anti-corruption awareness components in all educational programmes.

7. The development and implementation of measures to prevent corruption and bribery, including improvements to internal controls and compliance procedures.

8. Ensure that individuals who report corrupt or unethical practices are protected from retaliation or discriminated against.

9. Collaboration with law enforcement agencies to investigate and combat bribery and corruption.



10. The effectiveness of the Anti-Corruption Policy and the measures taken to implement it to be monitored and evaluated on a regular basis, with any necessary adjustments made to ensure its continued effectiveness.

11. Cultivate a culture of integrity through active communication, events, and the promotion of high standards of ethics and honesty..

12. Recognize and reward individuals and groups who exemplify high standards of integrity and ethical behaviour.

13. Engage all levels of the university organisation in the development, implementation and maintenance of integrity and anti-corruption policies.

University commitments in various areas of activity:

1. Commitments in the area of university management

Ensuring transparency of administrative processes.

Responsibility of the head of the university and the individual tasked with the prevention and detection of corruption to establish and implement University's anti-corruption policy.

The delineation of responsibilities (prevention of influence concentration) between the various management branches to ensue mutual control of the exercise of powers and prevention of undue influence and abuse.

It is not permitted to hold two or more positions at the University with management functions, including organisational, administrative and economic functions.

Adherence to the principles of hospitality, including the rules on giving and receiving gifts.

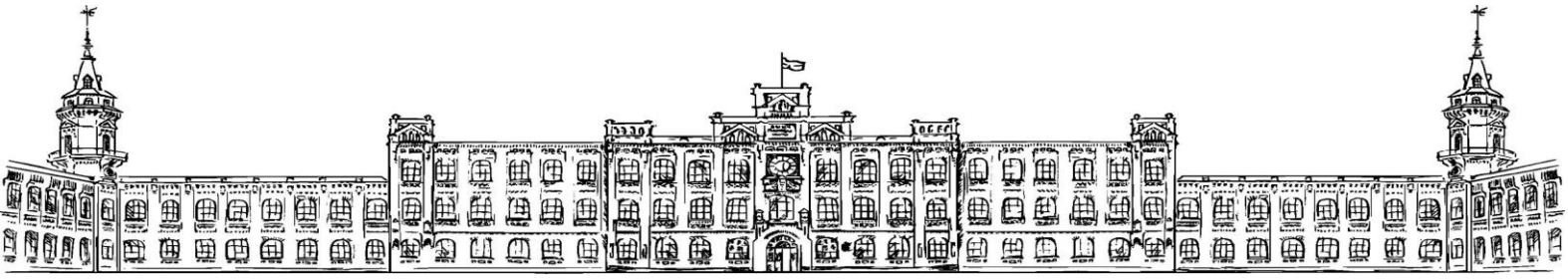
Implementation of a compliance audit and risk assessment system, with the involvement of external experts.

Organising activities to identify counterparties and partners.

Ensuring open access to information on financial activities, procurement, tendering and the distribution of University funds.

Publishing regular reports on the university activities, including financial and administrative activities.

Improving the policy of avoiding conflicts of interest, including the identification and prevention of situations where personal or financial interests may influence the decisions of those in managerial positions and persons involved in the educational process.



Setting of standards of business ethics and regulating the activities of University staff in difficult ethical situations through further improvement of the Code of Ethics and implementation of the Code of corporate conduct.

Providing training to staff and students to raise awareness of anti-corruption measures and to teach appropriate behaviour in situations that may give rise to corruption risks.

The establishment of internal control systems to verify compliance with procedures, including regular audits and reviews of financial transactions, and to ensure the proper use of budget funds and state property.

Providing a safe environment for reporting suspected corrupt practices or ethical violations by university staff or students.

The establishment of clear sanctions for violations of anti-corruption standards, both for staff and students.

2. Commitments to education

The implementation of enhanced policies and procedures to prevent academic fraud and plagiarism, and to provide comprehensive support for the Academic Integrity Policy.

Ensuring transparent criteria for student assessment and compliance with academic standards.

Providing training and educational sessions for students on ethics, integrity and anti-corruption.

3. Commitments to science

Ensure open access to research results and financial reports, with the exception of any information that is restricted..

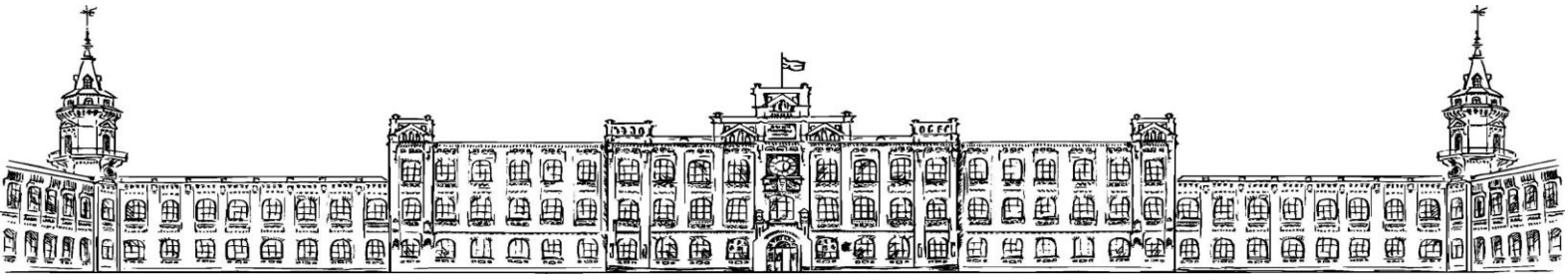
Establish clear rules and procedures to prevent data falsification and other forms of scientific fraud.

Manage research grants transparently and ensure that they are used in accordance with approved projects.

Ensure compliance checks and implementation audits.

4. Commitments to upbringing

Communicating to students the necessity to adhere to ethical standards and principles of integrity.



The creation and implementation of educational modules and programmes that encourage the development of moral and ethical values in students.

Establishing the responsibility of participants in the educational process for violations of integrity and corruption.

Promoting respect for professional ethics among all parties involved in the educational process.

5. Commitments in the area of economic activity

Ensuring transparent procurement and contracting procedures.

Identification and verification of the University contractors and partners to ensure their integrity and that they and their ultimate beneficiaries are not on sanctions lists.

Implementation of anti-corruption measures in procurement processes, including monitoring and reviewing potential conflicts of interest.

Ensuring that business partners are selected and contracts are concluded in accordance with the highest ethical standards, and that all forms of bribery and corruption are prevented.

Procurement processes are to be monitored and audited on a regular basis in order to identify and eliminate potential abuses and violations.

The establishment of transparent and accessible procedures for the submission of complaints and enquiries regarding procurement processes.

Providing training to procurement staff on ethics, anti-corruption practices and integrity.

Further improving the documentation of all stages of the procurement process, including the rationale for decisions and selected suppliers, to ensure transparency and accountability.

Involving the public in procurement monitoring and feedback processes to increase transparency and confidence in the process.

Use the University's financial, human, physical and technical resources in accordance with ethical and legal standards and regulations.

Ensuring transparency in the use of University property, including documentation of vehicle use, fuel and maintenance costs.

Optimising the use of University property to increase efficiency and reduce costs, including planning routes and schedules for vehicles, including preventing the use of University property for private purposes.

Continue to implement the internal control system to detect and prevent corrupt practices in business activities.

6. Commitments to communication

Ensuring open and honest communication between all parties involved in the educational process and the university management system.

The provision of public information via official channels, with updates as necessary.

Providing information to the public upon request from relevant stakeholders and handling complaints from citizens.

Ensuring the protection of confidential information and its use in accordance with the relevant ethical standards.

The establishment of transparent and consistent communication protocols for interactions with the public, the media, and other key stakeholders.

7. Financial and accounting commitments

Ensuring transparency in financial transactions, including reporting on income and expenditure. Financial results and reports on the use of budget funds are published on a regular basis.

The implementation of effective control systems to prevent financial mismanagement.

Regular financial audits and monitoring to ensure that financial transactions comply with ethical standards.

The implementation of both planned and unplanned internal control measures for monitoring and control of expenditure and prevent unauthorised or improper expenditure.

Conducting periodic external and internal audits to verify the accuracy of financial statements and ensuring that accounting records comply with established standards and policies.

Clearly documenting all financial transactions and maintaining accounting records in accordance with legal requirements and internal University policies.

Providing regular training and coaching to accounting and finance staff on relevant accounting and financial management issues.

Ensuring transparency in financial procedures, including the allocation and utilization of financial resources, as well as openness in funding processes.

Set up a system for submitting complaints and enquiries about financial transactions, and guarantee that these are dealt with in a prompt and fair manner.

Conducting regular reviews of financial processes in order to identify areas for improvement and to prevent potential financial risks.

8. Commitments to labour relations

Upholding ethical standards in in all aspects of labour relations, including fair working conditions and equal opportunities.

Ensuring transparency in the processes of competition, recruitment, assessment, promotion and appraisal of employees in line with best practice..

Recruitment of staff in compliance with professional standards and licensure requirements.

Prohibiting university staff from engaging in tasks that fall outside their job description.

Ensuring the protection of employees' rights and freedoms, including the exclusion of discrimination and abuse.

9. Commitments to international activities

Ensuring transparency when entering into agreements and partnerships with foreign partners.

Adherence to ethical standards and principles of integrity in all international projects and programmes.

Transparent management of international grants and programmes, including their operations and reporting.

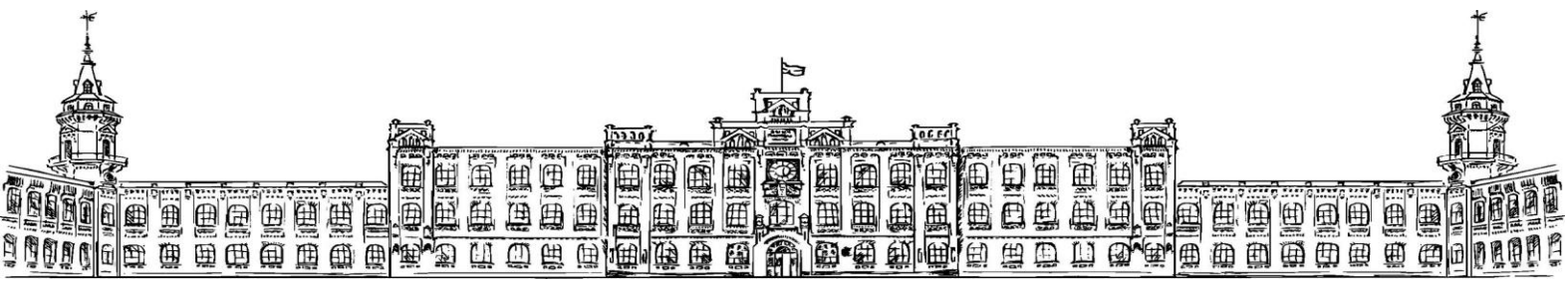
Active and honest cooperation with foreign and international organisations to exchange experience and best practice in education, science and management.

Ensuring the protection of the rights and freedoms of foreign students and staff.

Taking steps to prevent corrupt practices in all aspects of international activities, including international tenders and contracts.

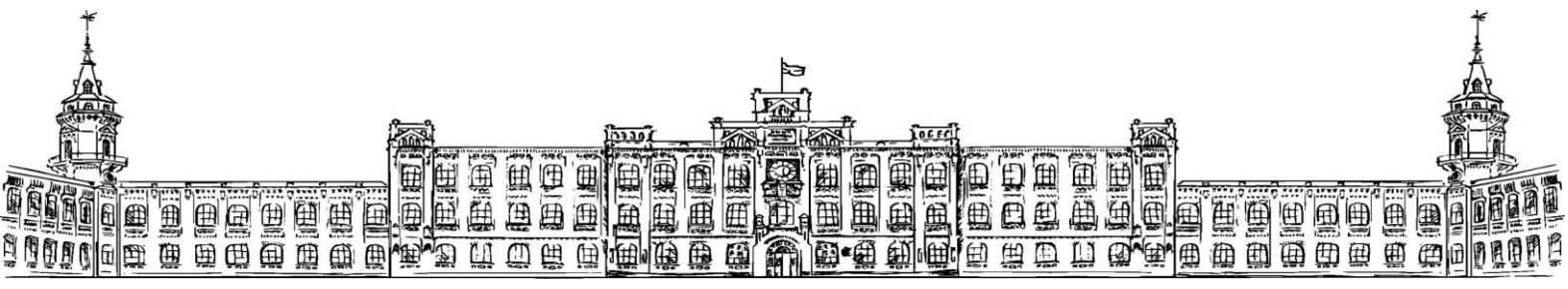
Identifying and verifying the University's contractors and partners to ensure their integrity and confirm that neither they nor their ultimate beneficiaries are listed on sanctions registers.

Transparent activities in the recruitment of international students.



Final provisions

The Anti-Corruption Policy, Bribery Prevention and Integrity Development Policy provides partners, international organisations and investors with a clear understanding of the University's stance on unethical and dishonest behaviour. It also sets out the University's commitment to the integration of anti-corruption principles at all levels, from senior management to every employee.

The leadership of the anti-corruption policy implementation process shall provide support for anti-corruption work and ensure that all participants in the educational process are aware that this work is not for profit. Its purpose is to safeguard against reputational and financial losses that may result from violations of anti-corruption legislation by participants in the educational process.

The Rector sets the standard for the majority of staff and students and represents the university in its dealings with external stakeholders. The sustainable development of the university depends on his personal approach to corruption and integrity, as well as the direction of his work in this area. At the same time, the status and powers of the person responsible for the prevention and detection of corruption provide assurance that the University's anti-corruption policy is being followed and developed.