**2018**

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**FOREWORD**

Based on the provisions of the laws of Ukraine, the acts of the Public Joint Stock Company “Naftogaz of Ukraine” (hereinafter - the **Public Company**), which are mandatory for implementation by the JSC “Ukrtransgaz” (hereinafter - the **Company**), the acts of the Company, the Anticorruption Program of the Company (hereinafter - the **Program**) hereby establishes the principle of zero tolerance to any corrupt practices; the determination to take all legal measures aimed to prevent, detect and combat corrupt practices and related actions; and, the expectation that the Company’s employees (authorized agents) would adhere to the said principle in their activity as well as in the legal relations with the Company’s counteragents (including potential representatives thereof), the public authorities, their officials, and other persons.

The Company hereby declares the unacceptability of corruption; encourages strict adherence to the provisions of this Program by its counteragents (including potential counteragents) as well as other persons; and, undertakes to assist in increasing the level of anticorruption culture among the Company’s employees.

**1. GENERAL PROVISIONS**

* + 1. 1.1. The program includes a set of rules, standards and procedures aimed to prevent, detect and counteract corrupt practices in the activity of the Company.
		2. 1.2. The Program shall be approved by the Head of the Company after approval by the Head of Compliance Department of the Company and discussion with the Company's employees, and, shall be enacted based on the relevant order of the Company.
		3. 1.3. The Program defines the managerial and organizational principles for prevention, detection and counteraction of corrupt practices within the Company, including anti-corruption measures, participants of such measures, their tasks, functions, powers and responsibilities.
		4. 1.4. The prevention, detection and counteraction of corrupt practices are the tasks included into the sphere of competence of the persons mentioned in Clause 1.6 of the Program with regard to:
* prevention of corruption - detection, study, restriction or elimination of causes and/or spread of corrupt practices (including corrupt acts and conditions conducive to them);
* combating of corruption - detection, termination, disclosure and investigation of corrupt practices;
* localization and minimization (elimination) of consequences of corrupt practices.
	+ 1. 1.5. The circle of officials responsible for implementation of the Program, within their competence, shall include:
* Founder (participant) of the Company;
* Head of the Company;
* Authorized officer;
* Employees.
	+ 1. 1.6. The Program is mandatory for implementation by the persons mentioned in Clause 1.5 of the Program.
		2. 1.7. All the employees, regardless of their official position, shall be personally liable for non-fulfillment of improper fulfillment of the requirements of this Program.
		3. 1.8. If there is sufficient information indicating that any of the employees have violated the requirements of the Program, the following measures shall be taken:

* a functional check or an investigation shall be carried out to confirm or refute particular information about alleged violation;
* Any employees proved to be at fault for violating the requirements of the Program based on the results of a functional check or an investigation may be brought to disciplinary, material and other liability in accordance with the Company's internal documents and legal requirements.
	+ 1. 1.9. The facts of violation of the requirements of the Program by any particular employees shall be decisive in cases probable career advancement of such employees.
		2. 1.10. The Program shall also be applied by the Company in its legal relations with counterparties and state authorities (local self-government bodies).
		3. 1.11. The relevant provisions of the Program shall be mandatory for implementation by the authorized agents of the Company, if so stipulated in any documents based on which such authorized agents of the Company perform their relevant representation duties.
		4. 1.12. The relevant provisions of the Program shall be mandatory for implementation by the counterparties of the Company, if so stipulated by the provisions of the contracts involving the Company as a party thereto (except for the agreements/contracts executed as per the standard form approved according to the established procedure).
		5. 1.13. The text of the Program is permanently available for review at the official website of the Company.

**2. OBJECTIVE AND TASKS OF PROGRAM**

* + 1. 2.1. The objective of the Program is to ensure that the Company’s activity is carried out in accordance with:
* Requirements of anti-corruption laws of Ukraine;
* Rules of international law with regard to prevention, detection and counteraction of corrupt practices (if such norms are applicable), including when so applicable, but not limited to, the Convention on Combating Bribery of Officials of Foreign States in the case of International Business Operations of the Organization for Economic Cooperation, and Development (OECD), the US Federal Law on Corruption Abroad, the Bribery Act of the United Kingdom of Great Britain and Northern Ireland;
* International practices and standards for prevention, detection and counteraction of corrupt practices (if implemented by the Company);
* Mandatory acts of the Company aimed to prevent, detect and counteract corrupt practices.
	+ 1. 2.2. The tasks of the Program are as follows:
* Development and implementation of effective mechanisms and procedures, as well as adoption measures aimed to prevent, detect and counteract corrupt practices;
* Formation of high anti-corruption awareness of the employees, and enhancement of the level of anti-corruption culture;
* Formation of a common understanding of the provisions of the Program among the employees, authorized agents and counterparties (including potential counterparties);
* Minimization (elimination) of risks of involvement of the Company, employees, authorized agents and counterparties in corrupt practices;
* Proper informing of the Company and the bodies of the Company of the progress of implementation of the Program.

**3. DEFINITION OF TERMS**

* + 1. 3.1. **Business hospitality** - business breakfasts, lunches and dinners, treating, corporate, cultural, sporting or other events, which are intended to establish or maintain business relationship, and involve any of the following guests:
* Counterparty (potential counterparty, other person) at the expense of the Company;
* Employee (authorized agent, person representing the Company based on contract) at the expense of counterparties (potential counterparties, other persons).
	+ 1. 3.2. **Contract** – an agreement in the meaning detailed in the Civil Code of Ukraine.
		2. 3.3. **Counterparty** - an individual or a legal entity acting as party to the contract concluded by the Company.
		3. 3.4. **Corruption risk** - a risk of committing corrupt acts and/or violation of the requirements of the Program.
		4. 3.5. **Corrupt act** - an act (inaction) detailed in Clause 5.1 of the Program, which is prohibited for committing by an employee (authorized agent, counterparty) in the framework of implementation of their official duties (representative powers, contractual obligations).
			1. 3.6. **Notice** – any information on:
* Existence of sufficient grounds to believe that a corrupt act can be committed;
* Suspicion of committing a corrupt act;
* Instances of instigation to committing corrupt acts;
* Cases of corrupt acts;
* Other cases related to corrupt practices in the activity of the Company;
* Detection of signs of other violations of the requirements of the Program.

3.7. **Gift** - cash or other property, benefits, privileges, services, and/or intangible assets that:

* Are provided (will be provided in the future) free of charge or at a price below the minimum market price, to a counterparty (including potential counterparties) and/or other persons at the expense of the Company;
* Are received (will be received in the future) free of charge or at a price below the minimum market price, by any of the employees (authorized agents, persons representing the Company based on contract) from counterparties (potential counterparties) and other persons in the course of implementation of their official duties (representative powers).
	1. 3.8. **Potential counterparty** - any individual or legal entity with whom the Company plans to enter into contract (inter alia, with regard to an incentive for conclusion of contract according to law).
	2. 3.9. **Potential conflict of interest** – existence of personal interest of an employee (an authorized agent, or a person representing the Company based on contract), whereby such private interest is related to the sphere of implementation of relevant duties (representative powers) thereof, and, may affect the effectiveness or impartiality of relevant decisions, or of acts or inaction in the performance of said duties (powers).
	3. 3.10. **Employee** - an individual having labor relations with the Company based on an employment contract, and performing a relevant job function.

For the purposes of this Program, the scope of employee shall include:

* Individuals performing relevant job functions based on civil contracts concluded with the Company;
* Member of the Board of the Company.
	+ 1. 3.11. **Private interest** - any property or non-property interest of an employee (authorized agent, or a person representing the Company based on contract), including those caused by personal, family, friendship or other relations outside of the framework of their official duties (representative powers) with individuals or legal entities, including the relations arising out of membership or activity in public, political, religious or other organizations.
		2. 3.12. **Offer (promise)** – an offer (promise) to an employee (authorized agent, person representing the Company based on contract) to give them or a third party an unlawful benefit in exchange for an act or inaction of such employee (authorized agent, person representing the Company based on contract) with use of the rights and duties assigned in the framework of labor relations with the Company (performance of representative powers), in the interests of the proposer or promiser of such benefit, or, in the interests of a third party.
		3. 3.13. **Real conflict of interest** - a contradiction between a private interest and job responsibilities (representative powers) of an employee (authorized agent, person representing the Company based on contract), which affects the objectivity or impartiality of their decisions, or causes the committing or failure to commit certain actions in the course of performance of the said duties (powers).
		4. 3.14. **Authorized officer** (head of anti-corruption program, Authorized officer of anti-corruption program) - an official of the Company responsible for implementation of the Program, whose legal status is determined by the Law of Ukraine "On Prevention of Corruption" (hereinafter - the **Law No. 1700-VIII**) and the Program.
		5. 3.15. **Authorized agent** - a person that has no labor relations with the Company and, in accordance with the Civil Code of Ukraine, represents the Company (except for the cases of representation arising from the Contract).

3.16. The other terms used in the Program are intended in the meanings detailed in the Law No. 1700-VII.

1. **4. RESPONSIBILITIES FOR PROGRAM IMPLEMENTATION**
	* 1. 4.1. The head of the Company, the employees, the authorized agents, and the counterparties are obliged to:
		2. 4.1.1. Avoid the commitment of, and the participation in commitment of, corrupt acts;
		3. 4.1.2. Immediately inform the Authorized officer, head or founder (participant) of the Company about:
* Existence of sufficient grounds to believe that a corrupt act can be committed;
* Suspicion of commitment of any corrupt acts;
* Instances of instigation to commit any corrupt acts;
* Cases of actual corrupt acts committed;
* Other cases related to corrupt practices in the activity of the Company;
* Detection of signs of other violations of the requirements of the Program;
	+ 1. 4.1.3. Fulfill the other duties provided for by the Program.
1. **5. CORRUPT ACTS**
	* 1. 5.1. The scope of possible corrupt acts shall include the following, committed directly (personally) or indirectly (with involvement or assistance of third parties), regardless of purpose, and in any form:
* Offer (promise);
* Acceptance of offer (promise);
* Receipt of unlawful benefit by employee (authorized agent, or person representing the Company based on contract), whether for themselves or for third parties, as well as a request to provide such benefit for themselves or for third parties;
* Provision of unlawful benefit to employee (authorized agent, or person representing the Company based on contract) for performing or failure to perform any actions using the rights and obligations assigned in the framework of labor relations with the Company (performance of representative powers), for the benefit of the provider of such benefit, or for the benefit of a third party;
* Abuse of power, i.e. intentional (aimed to obtain an unjustified benefit for themselves or for other persons) use of assigned powers by employee (authorized agent, or person representing the Company based on contract) within the framework of labor relations with the Company (performance of representative offices), if such act has caused material harm to the Company's legal interests, or the rights or interests of counterparties (including potential counterparties) thereof;
* Offer or promise to provide, or actual provision of, undue benefit to a person authorized to perform the functions of the state, or at their request, to another person, by employee (authorized agent, or person representing the Company based on contract), directly or through other persons with regard to performance of their official (representative) powers in the Company;
* Other acts committed by an employee, an authorized agent, or a counterparty, while actually prohibited in accordance with the laws of Ukraine in the sphere of preventing and combating corrupt practices.

**6. ANTI-CORRUPTION MEASURES**

* + 1. 6.1. The following anti-corruption measures (related to prevention, detection and counteraction of corrupt practices) are taken to effectively detect, regularly evaluate and minimize (eliminate) corruption risks:
		2. 6.1.1. control of representative expenses, provision and receipt of gifts within the framework of performance of official (representative) powers;
		3. 6.1.2. determination and implementation of the procedure for settlement of conflicts of interest;
		4. 6.1.3. inclusion of the requirements for mandatory compliance with the relevant provisions of the Program into:
* employment contracts with employees;
* documents based on which authorized agents (persons representing the Company based on contract) exercise representative powers, except for the cases stipulated by law or determined by the head of the Company;
* rules of internal code of labor conduct of the Company;
* provisions on structural subdivisions of the Company;
* contracts involving the Company as a party, except for the agreements/contracts executed as per the standard form approved according to the established procedure;
* draft contracts intended for conclusion by the Company, except for the agreements/contracts executed as per the standard form approved according to the established procedure;

6.1.4. systematic improvement of standards and procedures for prevention, detection and counteraction of corruption;

* + 1. 6.1.5. periodic development and implementation of new standards and procedures for prevention, detection and counteraction of corruption;
		2. 6.1.6. implementation of procedure for notification with observance of conditions of confidentiality of information;
		3. 6.1.7. monitoring of activity of employees (authorized agents, persons representing the Company based on contract), functions and business processes in the Company directly related to corruption risks;
		4. 6.1.8. implementation of procedures for identification, analysis, assessment, minimization (elimination) of corruption risks related to the activity of counterparties (potential counterparties);
		5. 6.1.9. analysis of drafts of internal documents of the Company and contracts to which the Company is to be a party (except for the agreements/contracts executed as per the standard form approved according to the established procedure), with the purpose of identification, analysis, assessment, and minimization (elimination) of corruption risks;
		6. 6.1.10. Regular assessment of corruption risks in the activity of the Company aimed to identify functions, positions, business processes, and types of activities directly related to corruption risks.

The Authorized officer assesses corruption risks on a regular basis.

According to the results of assessment of corruption risks, the Authorized officer develops measures for control of corruption risks.

* + - * 1. The Authorized officer supervises the implementation of corruption risk control measures and informs the Company's management of the results;
				2. 6.1.11. control over observance of the Program and of the requirements of the Company's internal documents related to counteraction, detection, prevention and combating of corruption;
		1. 6.1.12. introduction of restrictions on support of political parties by the Company;
		2. 6.1.13. introduction of promotional measures with regard to anti-corruption initiative of employees (authorized agents, persons representing the Company based on contract);
		3. 6.1.14. responding to facts related to corruption;
		4. 6.1.15. verification of a potential counterparty.

The Company verifies the potential counterparty prior to conclusion of any agreements therewith.

The Company's structural unit - the initiator of a contract with a potential counterparty - is obliged to make reasonable efforts to minimize (eliminate) the risk of establishing business relations with a potential counterparty, which may be involved in corrupt practices. To this end, the employees of the said unit:

* analyze the reputation of the potential counterparty for tolerance to corrupt practices;
* verify the issue of presence of an anti-corruption programs of the potential counterparty;
* if necessary, check the documents received from the potential counterparty for compliance with legal requirements;
* inform the potential counterparty of the contents of this Program;
* take into account the willingness (or refusal) of the potential counterparty to comply with the requirements of the Program, the laws of Ukraine related to prevention and combating of corruption, and to promote the prevention of corrupt practices.

The Company is entitled (except for the cases provided by law) to request certain information from a potential counterparty, as per the form detailed in Annex 2 (3) hereto, and to refuse establishing contractual relations thereof in cases of:

* failure to provide such information, or provision of false information;
* existence of reasonable doubts as to the impeccability of the business reputation of a potential counterparty, which may lead to occurrence of corrupt practices;
	+ 1. 6.1.16) study of the counterparty in the framework of anti-corruption activities.

The Company may carry out verification of counterparties with the aim of preventing corrupt practices.

The Company's structural unit - the initiator of a contract with a potential counterparty - is obliged to make reasonable efforts to minimize (eliminate) the risk of establishing business relations with a potential counterparty, which may be involved in corrupt practices. To this end, the employees of the said unit periodically analyze the counterparty's reputation for tolerance to corrupt practices.

The Company is entitled (except for the cases provided by law) to request certain information from a potential counterparty, as per the form detailed in Annex 2 (3) hereto, while the counterparty is obliged to provide such information.

Except as provided by law, the Company is entitled to:

* apply penalties for breach of contractual obligations by the counterparty with regard to fulfillment of the requirements of the Program, if such penalties are stipulated by the terms of the contract;
* refuse maintaining business relations (inter alia, by termination of a relevant contract) in cases of:
* failure to provide such information, or provision of false information;
* existence of reasonable doubts as to the impeccability of the business reputation of a counterparty, which may lead to occurrence of corrupt practices;
	+ 1. 6.1.17. raising the level of anti-corruption culture of, and formation of high anti-corruption awareness among, the employees.

The Company promotes the raising level of anti-corruption culture, and formation of high anti-corruption awareness among the employees by way of training and information the employees (if necessary - authorized agents, persons representing the Company based on contract) with regard to the requirements of the Program and other aspects in the field of detection, prevention and combating of corruption. The said training and information measures, inter alia, include:

* publication of the Program at the official website of the Company;
* introductory trainings for new employees on the prevention, detection and counteraction of corruption;
* familiarization of employees with the Program (against their personal signatures), as per the document form detailed in Annex 1 hereto;
* regular outreach activities (advising on application of the Program’s rules);
* periodical organizing and conducting of relevant exercises, trainings, seminars, and tests;
* sending of anti-corruption information via corporate email.
1. **7. NOTICES**
	1. 7.1. The Company guarantees to the employees and other persons to maintain the confidentiality of the content of their notices submitted to the Authorized officer, head or founder (participant) of the Company, except for the following cases:
* if such employees/persons should fail to comply with the conditions of confidentiality of notification;
* in the other cases provided for by law.
	1. 7.2. The Authorized officer, the head, and the founder (the participant) of the Company are obliged not to disclose (except for the cases provided for by law) any information that could be used for identification of the person who sent the notice.

This obligation also extends to the other persons (who became aware of the information in question), i.e.:

* other employees;
* authorized agents;
* counterparties.
	1. 7.3. The notices may be submitted in the oral and written form, as well as via appropriate communication channels.
	2. 7.4. The notice may be submitted in anonymous form (without indication of author). Such notice is subject to review if the information contained therein relates to a specific employee, authorized agent, counterparty (potential counterparty), and contains factual data that can be verified.
	3. 7.5. The submission of deliberately false notices is not allowed.
	4. 7.6. If a notice is related to the Authorized officer , the head of the Company (or another member of the Board), the founder (member) of the Company, or a group of these persons at the same time, such notice shall be sent to the person responsible for implementation of the Company's anti-corruption program - the Head of the Company's anti-corruption program.
	5. 7.7. If the notice is related to a particular employee (other than the head of the Company and/or other members of the Management Board, or the Authorized officer), an authorized agent, a counterparty (potential counterparty), or a group of these persons at the same time, the verification of the notice, if there are relevant grounds therefore, shall be carried out within the framework of a functional check (official investigation) initiated by the Authorized officer.

However, the restrictions stipulated in Clause 7.2 of the Program do not apply to the transfer to the Head of the Company and/or to the Authorized officer of the information that could be used to identify the person who sent the notice.

A functional check (investigation) is conducted only in cases where the notice is related to particular individuals and contains factual data that can be verified.

The Authorized officer is then appointed as the head of the working group assigned to conduct a functional check (as the head of the commission for conducting the functional check).

The persons involved in the performance of such a functional check (investigation) are obliged not to disclose any information that can be used to identify the person who submitted the notice, as well as the content of such notice.

The Authorized officer informs the management of the Company with regard to the results of verification of the notice.

* 1. 7.8. The Authorized officer keeps a systematic account of notices and incidents related to corrupt practices, with indication of relevant response measures taken.
	2. 7.9. If an employee, an authorized agent, or a counterparty has submitted a notice in advance, or willfully refused to engage in a corrupt act, such person(s) may not be subject to appropriate penalties (sanctions).
	3. 7.10. An employee, an authorized agent, or a counterparty may not be subject to any penalties (sanctions) if their notice was not deemed a sufficient ground for conducting a relevant check.

**8. GIFTS AND BUSINESS HOSPITALITY**

* 1. 8.1. The Code of Corporate Ethics of the Company establishes a limit on the value of gifts and business hospitality.
	2. 8.2. The limit on the value of a gift does not apply to gifts that are received as public discounts on goods, services, winnings, prizes, premiums and bonuses.

**9. LEGAL STATUS OF AUTHORIZED OFFICER**

* 1. 9.1. The Authorized officer is appointed by the head of the Company according to the law with the view to implement the Program.
	2. 9.2. The obligations of the Authorized officer can be carried out by an individual having the business and moral qualities, professional level, and health condition suitable for implementation of the said obligations.
	3. 9.3. A person may not be appointed as the Authorized officer in case of circumstances detailed in Part 3, Article 64, Law No. 1700-XII.
	4. 9.4. The Authorized officer is an employee of the Company. The status of the Authorized officer is determined in accordance with Law No. 1700-XII, the Public Company's acts binding on the Company, internal documents of the Company, and this Program.
	5. 9.5. In case of occurrence of any incompatibility circumstances, the Authorized officer is obliged, during two days from the date of occurrence of such circumstances, to inform the Head of the Company, with parallel submission of an application for termination of the employment contract on their own initiative.
	6. 9.6. The Authorized officer may be dismissed ahead of time in the cases provided for in Part 5, Article 64, Law No. 1700-XII.
	7. 9.7. In case of dismissal of the Authorized officer, the Head of the Company is obliged to notify the National Agency for Prevention of Corruption, in writing and during two working days, of the fact of such dismissal, and to ensure that a new candidate for the said position is offered without delay.
	8. 9.8. The main tasks of the Authorized officer are to prepare, ensure implementation of and control over implementation, the measures aimed to prevent, detect and counteract corruption within the Company.
	9. 9.9. The Authorized officer is independent in implementation of their activity.
	10. 9.10. The Authorized officer exercises their rights and obligations directly.
		1. 9.11. The Authorized officer may involve other employees in the performance of their functions.
		2. 9.12. The activity of the Authorized officer cannot be interfered with by the founder (participant), employees, authorized agents, contractors, as well as other persons beyond their powers stipulated by the law, articles of association, decisions of governing bodies or internal documents of the Company (except for the cases stipulated by law).
		3. 9.13. The Authorized officer cannot be vested with any duties that are outside of the established framework of powers thereof, and/or limit the Authorized officer’s ability to perform their established range of duties.
		4. 9.14. The head of the Company is obliged to:
* provide the Authorized officer with adequate material and organizational conditions of labor;
* assist the Authorized officer in the performance of the functions stipulated by the Law No. 1700-XII and in this Program;
* promptly respond to written and oral appeals, proposals and recommendations of the Authorized officer provided within the framework of implementation of the Program;
* on the initiative of the Authorized officer, to send requests to state authorities, local self-government bodies, enterprises, institutions and organizations, regardless of the form of ownership, aimed to obtain relevant information and materials necessary for implementation of the tasks assigned to the Authorized officer.
	+ 1. 9.15. In the framework of their powers and tasks, the Authorized officer is obliged to:
* perform their functions objectively and impartially;
* organize preparation of the Company's internal documents on the formation and implementation of the Program;
* develop and submit for approval to the Head of the Company internal documents of the Company on the issues stipulated by the Program;
* provide for supervision, control and monitoring of the employees and the head of the Company for compliance with the provisions of the Law No. 1700-XII and of the Program;
* assess the results of implementation of the measures envisaged by the Program;
* provide for preparation and submission to the Head of the Company of the report on progress of implementation of the Program;
* cooperate with employees and other persons that report in good faith on possible facts of violation of the requirements of the Program, committing of corrupt acts and other corrupt practices;
* provide for preparation and submission to the Head of the Company of proposals for carrying out checks for compliance with the Program’s requirements;
* participate in the above checks according to the Program;
* participate in periodic assessment of corruption risks;
* provide for systematic accounting of notices, incidents related to corruption, and response measures taken;
* organize and participate in verification of counterparties (potential counterparties) according to the Program;
* carry out regular outreach activities (provision of consultations on application of Program’s norms);
* participate, jointly with state authorities, local self-government bodies, enterprises, institutions, and organizations, in settlement of issues identified by the Program;
* organize for advanced training of employees on the issues defined by the Program;
* participate in the procedures for personnel selection of the Company;
* provide for interaction and coordination between the Company's structural divisions regarding the preparation, implementation of, and control over implementation of, the Program;
* inform the Compliance division of the Company in case of detecting any corruption risks and/or other violations of the Program, which could significantly affect the Company's activity;
* carry out the other duties stipulated by the Law No. 1700-XII, the Program and the employment contract.
	1. 9.16. In the framework of implementation of their tasks, the Authorized officer is entitled to:
* receive from the head of the Company, employees (authorized agents, persons representing the Company based on contract) written and oral explanations on issues concerning the powers assigned thereto;
* receive from structural units and branches of the Company information and duly certified copies of documents relating to the activity of the Company (branches), including those relating to the procurement of goods, works, services or participation in such purchases, etc.

If necessary, the Authorized officer shall be granted with access to the originals of the relevant documents.

In cases where it is impractical to make a large number of copies of documents, the Authorized officer (at the decision of the head of the department, the branch) can be presented with the original documents, which are subject to return during 10 working days from the date of completion of the measure for which they were requested;

* receive drafts of financial, organizational, administrative, production documents, and contracts for their verification for existence of corruption risks;
* gain access to the Company's warehouses, production facilities, carry out control and/or other activities in such premises;
* gain access to the electronic data storage and processing facilities available in the Company and, if necessary, to request from the heads of the relevant structural divisions of the Company (branches) that the relevant data are issued on certified paper;
* initiate the sending of requests to state authorities, local self-government bodies, enterprises, institutions, and organizations of all forms of ownership for provision of necessary information and documents (duly certified copies of documents);
* initiate the issue of bringing employees and the head of the Company to liability, inter alia, by dismissal from their relevant positions in accordance with law;
* apply to the head of the Company on issues related to exercise of their powers and fulfillment of duties in accordance with the provisions of the Program;
* exercise the other rights stipulated by the Law No. 1700-XII, the Program, the employment contract and the job description.

**10. PROCEDURE FOR REPORTING OF AUTHORIZED OFFICER TO HEAD OF COMPANY**

* 1. 10.1. The Authorized officer, at least once per year by February 10, and at the request of the Head of the Company, within a period established by the latter, prepares a report on the results of the Program implementation (hereinafter - the Report).

The report should include the information on:

* status of implementation of the actions defined by the Program;
* results of implementation of the actions identified by the Program;
* detected violations of the requirements of Law No. 1700-XII, and of the Program; measures taken to remedy such violations, and results of such measures;
* facts of obstruction of the proper performance of the powers of the Authorized officer, establishment of unjustified restrictions for the latter, cases of interference with its activity by third parties;
* suggestions and recommendations available.

If necessary, the content of the provided Report is further discussed by the Authorized officer with the head of the Company.

**11. PROCEDURES FOR PROTECTION OF EMPLOYEES WHO SUBMITTED NOTICES**

* + 1. 11.1. The Head of the Company and/or the Authorized officer, within the limits of their powers, provide conditions for the protection of the persons who assist in the prevention, detection and counteraction of corruption in the Company (hereinafter - the Discloser).
		2. 11.2. The Discloser may not be dismissed or forced to dismiss, disciplined or subjected by the management of the Company (branch) to other negative measures of influence (transfer, change of working conditions, refusal of appointment to a higher position, reduction of salary, etc.), or the threat of such actions due to the fact of submission of such notice.
		3. 11.3 In case of leakage of confidential information about the Discloser, the head of the Company and the Authorized officer, acting at the request of such employee or on their own initiative, should immediately take measures sufficient to avoid the negative consequences for the Discloser related to such leakage.
		4. 11.4. Measures for protection of the Discloser should be determined by the head of the Company jointly with the Authorized officer, and be implemented with the written consent of the employee.

**12. CONTROL AND MONITORING OF PROGRAM COMPLIANCE**

* 1. 12.1. The scope of actions related to the control and monitoring of compliance with the Program includes:
* control over compliance with the Program by the employees, which is carried out on a permanent basis by the heads of the structural divisions of the Company (Branches);
* measures for control of processes and procedures for corruption risks, which are carried out on a permanent basis by the heads of the structural units of the Company (Branches);
* monitoring of the Program implementation at the Company level, which is carried out by the Authorized officer;
* regular review of the Program and the related internal documents of the Company;
* adoption of anti-corruption measures initiated by the Supervisory Board or the Management Board of the Company.

**13. FINAL PROVISIONS**

13.1. The Program is an integral part of the Company's internal code of labor conduct.

13.2. The Program is issued for an indefinite term and should be regularly reviewed to maintain compliance with the requirements of anti-corruption laws.

13.3. The provisions of the Program which are contrary to the requirements of the laws should not be applied.

13.4. If the provisions of the Program should be contrary to the provisions of other internal compliance documents, the provisions of the Program shall prevail.

13.5. Amendments to the Program may be initiated by the Authorized officer, the head of the Company, the employees, and/or the compliance officer of the Company.

**ANNEX 1 to Anti-Corruption Program of JSC “UKRTRANSGAZ”**

The obligation to observe the requirements of the Anti-Corruption Program of JSC “UKRTRANSGAZ”

Full name

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Position \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

I hereby confirm to have read and undertake to observe the requirements and fulfill the obligations stipulated by the Anti-Corruption Program of JSC “UKRTRANSGAZ”.

I hereby further confirm to realize that in case of violation of the provisions of the Anti-Corruption Program of JSC “UKRTRANSGAZ” I may be liable in accordance with the current laws.

Date

Signature