



**UNIC**

Ukrainian Network  
of Integrity and Compliance

# Ethics Committee and Ethics Standards as a Prerequisite for Integrity Culture of UNIC

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# Ethics Committee

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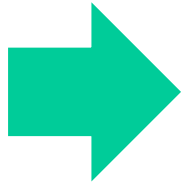
**Our mission**

**Development and promotion  
of the culture of integrity**

**To do the right things, at the  
right time, for the right  
reason**

# Role of the Ethics Committee

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- Helps to set and interpret the UNIC ethical standards; proposes amendments to such standards

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- Provides guidance to the Members to help their compliance with UNIC ethical standards

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- Provides ad-hoc advice to the Executive Committee on matters of ethics

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- Considers potential violations by the members of UNIC ethical standards

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- Where the Ethics Committee determines that, more likely than not, the Member in question has breached the principles under the Memorandum/ethical standards, makes recommendation to the Executive Committee on termination of membership

# Ethics Committee. What was done so far

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Elected the Head of the UNIC Ethics Committee and prepared the Action plan for 2018



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Developed and approved the list of duties and responsibilities of the UNIC Ethics Committee



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Jointly with the UNIC Expert Group, developed the UNIC Ethical Standards based on the Integrity Principles of the UNIC Member



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Developed the Procedures and Methodology for the assessment of alleged breaches by UNIC members as part of the Integrity Principles of the UNIC Member

# UNIC Ethical Standards

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## Why such Ethical Standards?

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- To help implement the ethical objectives outlined in the Memorandum
- To ensure that the Members have a good understanding of ethical behaviour required of them
- To set clear standard of behaviour that is expected of UNIC Members and which should be systemically promoted by them throughout their own organisation (to management, Board, employees) and beyond (their clients, suppliers, partners)
- To provide for clear standards that would enable the Ethics Committee and the Executive Committee to define the boundaries of ethical behaviour for the Members and to establish where a breach of the Ethical Standards/principles under the Memorandum has occurred
- Where a breach is established, appropriate measures are taken by the Executive Committee on recommendation of the Ethics Committee, including, where appropriate, termination of membership

# UNIC Ethical Standards

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**In implementation of the memorandum, the Ethical Standards provide for a clear and measurable standard of behaviour by the Members, in their conduct as UNIC Members and in a business context**

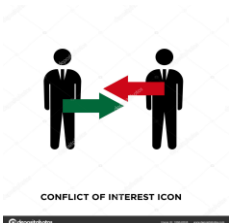
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**Compliance with applicable laws** – operation in accordance with applicable law, in Ukraine but also outside of Ukraine, for the Member and its staff, including officers, directors, employees, etc



**Bribes** – absolute prohibition of all forms of bribery, direct or indirect, including facilitation payments. This should apply to all people within the organisation; they must be clearly instructed and trained to fully understand what constitutes corrupt behaviour, whether as a taker, giver, facilitator, etc



**Conflicts of Interest** – avoid conflicts of interest – real or apparent; adopt appropriate rules for managing conflicts, which should apply internally, but also to contractors, agents, consultants, lobbyists and other parties, through contractual arrangements

# UNIC Ethical Standards

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**Political Contributions** – not to make political contributions as a way of obtaining an unfair advantage (being a situation or arrangement which puts the beneficiary in a preferred position based on factors other than merit)



**Charitable contributions and sponsorships** – ensure that any charitable contributions are not used as a scheme for bribery, including obtaining of an unfair advantage; Members should publicly disclose all their charitable contributions and sponsorships



**Gifts, Hospitality and Expenses** – prohibition on offering, giving or receipt of any gift and hospitality whenever it may improperly influence business transactions or decision-making (including obtaining an unfair advantage); Members to put in place clear and transparent rules on gifts, hospitality and expenses

# UNIC Ethical Standards

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**Financial and accounting control** – all books, records and accounts need be kept at all times in reasonable detail to reflect all transactions and asset dispositions, with adequate internal controls being in place



**Reporting potential violations** – effective policies and procedures which allow effective reporting of misconduct; staff trained to understand what constitutes misconduct; effective protection of whistleblowers



# UNIC bodies that ensure compliance with Ethical Standards



## UNIC Secretariat

- Under guidance from the Ethics Committee, monitors compliance

## UNIC Ethics Committee

- assesses compliance with the ethical principles consistent with Section 2.13 of the Memorandum

## UNIC Executive Committee

- UNIC Executive Committee – should a breach be established by the Ethics Committee, appropriate action, including sanctions, is being considered by the Executive Committee pursuant to Sections 2.13 – 2.15 of the Memorandum