

APPROVED

Order of the State Property Fund of Ukraine
May 26, 2025 No. 771

**Anti-Corruption Program
of the State Property Fund of Ukraine
for 2025–2027**

TABLE OF CONTENTS

1. Definition of the fundamental principles of the general departmental policy on preventing and detecting corruption in the activities of the State Property Fund of Ukraine, measures for their implementation, as well as for the implementation of the Anti-Corruption Strategy and the State Anti-Corruption Program.
2. Assessment of corruption risks in the activities of the State Property Fund of Ukraine, the causes that generate them, and the conditions that facilitate them.
3. Measures to minimize (eliminate) identified corruption risks.
4. Training and information dissemination activities regarding anti-corruption programs.
5. Procedures for monitoring, evaluation of implementation, and periodic review of the Anti-Corruption Program.
6. Other anti-corruption measures.
7. Conclusions based on the assessment of implementation of the Anti-Corruption Program for 2021–2024.
8. Measures for implementation of the principles of the anti-corruption policy of the State Property Fund of Ukraine.

1. Definition of the Principles of General Departmental Policy on Preventing and Detecting Corruption in the Activities of the State Property Fund of Ukraine, Measures for Their Implementation, as well as for the Implementation of the Anti-Corruption Strategy and the State Anti-Corruption Program

The Anti-Corruption Program of the State Property Fund of Ukraine for 2025–2027 (hereinafter – the **Anti-Corruption Program**) has been developed according with Article 19 of the Law of Ukraine “On Prevention of Corruption”, taking into account the Corruption Risk Management Methodology approved by Order No. 830/21 of the National Agency on Corruption Prevention dated December 28, 2021, registered with the Ministry of Justice of Ukraine on February 17, 2022 under No. 219/37555 (hereinafter – the **Methodology**).

The State Property Fund of Ukraine (hereinafter – the **Fund**) is a central executive body with special status that implements state policy in the areas of privatization, lease, use and disposal of state property, management of state-owned assets, including state corporate rights related to objects under its jurisdiction, as well as state regulation in the field of property valuation, property rights, and professional valuation activities.

In its activities, the Fund is guided by the Constitution of Ukraine, the Law of Ukraine “On the State Property Fund of Ukraine”, other laws of Ukraine, acts of the President of Ukraine, the Verkhovna Rada of Ukraine, and the Cabinet of Ministers of Ukraine, other legislative acts of Ukraine, as well as instructions of the President of Ukraine and the Prime Minister of Ukraine.

One of the components of the corruption prevention system within the Fund is the development and approval of the Anti-Corruption Program, which involves the implementation of effective anti-corruption prevention mechanisms.

According to this Anti-Corruption Program, the management and employees of the Fund’s central office and its regional branches undertake, in the course of their activities, to adhere to the principle of zero tolerance for corruption in any form and to take all necessary measures for preventing, detecting, and counteracting corruption as provided for by the legislation of Ukraine and this Anti-Corruption Program.

This Anti-Corruption Program is mandatory for all employees of the Fund’s central office and its regional branches regardless of their position. All employees of the Fund’s central office and regional branches shall familiarize themselves with the requirements of this Anti-Corruption Program and comply with the rules and anti-corruption procedures set out therein.

The purpose of the Anti-Corruption Program is to establish within the Fund and its regional branches an effective system for preventing and detecting corruption based on the principles of anti-corruption policy formation and implementation defined by the Law of Ukraine “On Prevention of Corruption” (hereinafter – the **Law**).

The Anti-Corruption Program is based on the principles of the rule of law, legality, transparency, and accountability. Its implementation requires the introduction of the following measures:

- preparation and implementation of the Anti-Corruption Program;
- identification of corruption risks in the Fund’s activities, determination of the main causes and conditions for their occurrence, and implementation of measures to eliminate (minimize) them;
- identification of conflicts of interest in the exercise of powers by Fund employees as well as its settlement, and monitoring compliance with requirements aimed at preventing such conflicts;
- prevention of violations and ineffective management of state resources and their impact on the performance of public sector bodies;
- identification of indications of ineffective managerial decisions followed by assessment of corruption risks and causal relationships that may indicate the presence of a corruption component contributing to identified violations and flaws;
- monitoring timely submission of declarations by Fund employees;
- creating conditions for reporting violations of anti-corruption legislation and providing advisory assistance to persons reporting such violations (hereafter – the **Whistleblowers**);
- organization and conduct of training for Fund employees on compliance with anti-corruption legislation, including advisory work on prevention, detection, and counteraction to corruption, as well as general and preventive measures;
- informing employees of the need to observe general ethical standards of conduct while performing official duties, including politeness in relations with citizens, managers, colleagues, and subordinates;
- conducting special background checks on persons applying for positions within the Fund;
- review and structuring of the “Anti-Corruption Activities” section on the Fund’s official website.

- introduction of control over the proper organization of activities related to the prevention and detection of corruption in the Fund’s regional branches and at enterprises, institutions, and organizations under the Fund’s jurisdiction;
- monitoring compliance with anti-corruption legislation;
- conducting internal investigations and taking measures to bring to liability persons guilty of committing corruption or corruption-related offenses, and informing specially authorized anti-corruption entities about such cases where necessary;
- identification of risks that negatively affect the performance of functions and tasks, and assessment of the existence of a corruption component where necessary;
- ensuring confidentiality of information concerning persons who in good faith report possible facts of corruption or corruption-related offenses, or facts of inducement to commit corruption offenses;
- ensuring access to public information and compliance with the principles of transparency and impartiality when socially significant information concerning the activities of the State Property Fund of Ukraine and its regional branches is publically disclosed on the official website;
- ensuring public access to discussion of draft regulatory legal acts developed by the Fund.

An important aspect of developing the Anti-Corruption Program, as well as shaping and implementing anti-corruption policy in order to ensure transparent corruption risk assessment, is the professional involvement of stakeholders and experts in the drafting process through questionnaires (surveys). This also includes discussion of the Anti-Corruption Program with representatives of civil society and the engagement of experts.

The Anti-Corruption Program establishes a set of rules, standards, and procedures for detecting, combating, and preventing corruption in the Fund’s activities.

The Anti-Corruption Program has been developed on the basis of the results of the analysis of corruption risks in the areas of activity of the Fund and its regional branches. The anti-corruption measures set out therein are mandatory and apply to all employees of the Fund and its regional branches.

For the implementation of the Law of Ukraine “On the Principles of State Anti-Corruption Policy for 2021–2025” and the State Anti-Corruption Program for 2023–2025 approved by Resolution No. 220 of the Cabinet of Ministers of Ukraine dated March 4, 2023 “On Approval of the State Anti-Corruption Program for 2023–2025”, it is necessary to implement the measures set out in Annex 2, “Action Plan

of the State Property Fund of Ukraine for Implementation of the State Anti-Corruption Program for 2023–2025 (SAP) ” (attached).

2. Assessment of Corruption Risks in the Activities of the Fund, the Causes That Generate Them, and the Conditions That Facilitate Them

An important stage in the field of corruption prevention and counteraction is corruption risk assessment aimed at identifying processes most vulnerable to corruption during the exercise of powers by Fund employees, as well as the causes and conditions contributing to corruption risks.

Conducting an objective assessment of corruption risks in the activities of the Fund and its regional branches is a necessary step in preventing violations of anti-corruption legislation.

A Working Group on Corruption Risk Assessment has been established within the Fund in compliance with the legislation, and the relevant Regulation governing its activities has been approved. A consolidated Risk Register of the Fund based on the results of corruption risk assessment has also been prepared (Annex 1).

One of the key aspects of identifying risks that may negatively affect the performance of the Fund’s functions and tasks was the examination of its activities and environment through collection and analysis of both internal and external factors in processes where there is a probability of corruption or corruption-related offenses.

The assessment of corruption risks in the activities of the Fund and identification of the causes and conditions contributing to them was carried out as follows:

- identification of corruption risks in the Fund’s activities through examination (analysis) of the Fund’s external and internal environment as a whole in order to identify corruption risk factors in regulatory legal acts and organizational and managerial activities of the Fund’s structural units during performance of their functions and tasks;
- analysis of each identified corruption risk and determination of its level at which corruption offenses or corruption-related offenses are most likely to occur (**low, medium, high**).

Among the possible factors of corruption risks, which are fairly standard and largely recurrent in the activities of public authorities, the following may be identified: lack of integrity of civil servants, pursuit of personal gain, insufficient managerial control, lack of knowledge of legislation, etc.

3. Measures to Eliminate Identified Corruption Risks

Permanent and systematic control over the implementation of measures aimed at identifying, minimizing, and eliminating corruption risks within the Fund and its regional branches is exercised by the Fund's management, heads of regional branches, and authorized anti-corruption units (officials).

Heads of independent structural units of the Fund continuously monitor implementation of the Anti-Corruption Program and, on a quarterly basis, no later than the 5th day of the month following the reporting period, provide the authorized anti-corruption unit with information on implementation of the mentioned Program, including measures taken to eliminate identified potential corruption risks.

During the development of the Anti-Corruption Program, probable corruption risks and measures for their minimization/elimination were identified within the Fund. These risks and measures are reflected in the Risk Register, which forms an annex to the Anti-Corruption Program.

To minimize/eliminate potential corruption risks, heads of independent structural units of the Fund should strengthen supervision over the work of subordinate employees. It is also necessary for management to provide subordinate staff with practical and methodological assistance in carrying out assigned tasks. An effective way of reducing corruption risks within the Fund will be informing employees about liability for violations of anti-corruption legislation and improving certain regulatory and administrative acts.

It is also necessary to inform employees about the dangers of corruption and the consequences of corrupt conduct, carry out specialized training aimed at developing knowledge and moral-psychological attitudes regarding the inadmissibility of corruption offenses, carry out timely analysis of corruption risks, and implement preventive anti-corruption measures that will help prevent violations of anti-corruption legislation of Ukraine by civil servants, positively affect improvement of the Fund's performance, and contribute to strengthening its authority.

4. Training and Information Dissemination Measures Regarding Anti-Corruption Programs

Heads of structural units have the right to initiate before the Head of the Fund or the person acting in that capacity the need to conduct seminars, meetings, and other activities aimed at familiarizing employees of the Fund and its regional branches with anti-corruption legislation.

Specialists from other public authorities, local self-government bodies, public organizations, and international organizations may be involved in conducting professional development activities in the field of corruption prevention.

Authorized anti-corruption units (officials) also provide advisory assistance to employees in completing declarations of persons authorized to perform state or local self-government functions.

During 2025–2027, Fund employees are planned to undergo training seminars on corruption prevention and detection.

If anti-corruption entities organize round tables and other training activities concerning key provisions and requirements of anti-corruption legislation, the Fund shall ensure participation of employees (including employees of the authorized unit) in such activities.

The Anti-Corruption Program is publicly accessible and published on the Fund’s official website under the subsection “Anti-Corruption Program” within the section “Anti-Corruption Activities.”

Conducting training by the designated unit responsible for prevention

| Topic | Target audience | Responsible unit | Implementation period |
|---|---|--|-------------------------------------|
| Video seminar with regional branches of the Fund: requirements, rules and restrictions of anti-corruption legislation; specifics of completing electronic declarations; liability for corruption and corruption-related offenses; prevention and settlement of conflicts of interest and other restrictions; rules of ethical conduct; methods for submitting reports on corruption and corruption-related offenses by employees and the procedure for their review; rights of whistleblowers and legal aspects of their protection | Authorized anti-corruption officers in the Fund’s regional branches and other representatives of regional branches (optional participation) | Corruption Prevention and Detection Department | September–December during 2025–2027 |
| Seminar on requirements, rules and restrictions of anti-corruption legislation | Heads of structural units (representatives | Corruption Prevention and | September–December during 2025–2027 |

| | | | |
|--|---|--|-------------------------------------|
| | of structural units) | Detection Department | |
| Seminar on liability for corruption and corruption-related offenses | Heads of structural units (representatives of structural units) | Corruption Prevention and Detection Department | September–December during 2025–2027 |
| Seminar on specifics of completing electronic declarations | Heads of structural units (representatives of structural units) | Corruption Prevention and Detection Department | January–March during 2025–2027 |
| Seminar on prevention and settlement of conflicts of interest and other restrictions | Heads of structural units (representatives of structural units) | Corruption Prevention and Detection Department | September–December during 2025–2027 |
| Seminar on rules of ethical conduct | Heads of structural units (representatives of structural units) | Corruption Prevention and Detection Department | September–December during 2025–2027 |
| Seminar on methods for submitting reports on corruption and corruption-related offenses by employees, procedures for their review, whistleblowers’ rights, and legal aspects of their protection | Heads of structural units (representatives of structural units) | Corruption Prevention and Detection Department | September–December during 2025–2027 |

For the purpose of verifying acquired knowledge, following the conducted training sessions, participants may be offered an anonymous questionnaire (in the form of test questions).

5. Procedures for Monitoring, Evaluation of Implementation, and Periodic Review of the Anti-Corruption Program

Monitoring of the Program implementation is carried out through analysis of reporting, assessment of implementation of measures, and review of regulatory documents. The Program shall be reviewed as necessary.

During the review, the results of monitoring implementation of anti-corruption measures, analysis of the effectiveness of implemented measures, as well

as identification of possible corruption risks arising during implementation of the Program are taken into account.

The Program review may be initiated in the event of identification of new corruption risks or the need to introduce amendments in response to changes in legislation, including anti-corruption legislation, or proposals received from the National Agency on Corruption Prevention (NACP) or other relevant authorities. In addition, periodic review may be conducted in the event of ineffectiveness of certain measures defined by the Program or where adaptation of its provisions to new requirements arising from corruption risk assessment becomes necessary.

Amendments to the Program may be introduced based on the results of evaluation of its implementation effectiveness subject to approval by the National Agency on Corruption Prevention. The updated version of the Program, together with relevant amendments, has to be published on the Fund's official website to ensure accessibility for a wide audience and relevant supervisory authorities.

6. Other Anti-Corruption Measures

The Program provides for the introduction of internal control mechanisms, ensuring transparency of procedures, compliance with ethical standards, and implementation of measures provided by the State Anti-Corruption Program for 2023–2025 (the Action Plan of the State Property Fund of Ukraine for implementation of the State Anti-Corruption Program for 2023–2025 (SAP) is attached).

The Anti-Corruption Program is mandatory for all employees of the State Property Fund of Ukraine and its regional branches.

7. Conclusions Based on the Assessment of Implementation of the Anti-Corruption Program for 2021–2024

The Anti-Corruption Program of the State Property Fund of Ukraine for 2021–2024 provided for implementation of 21 permanent measures aimed at realization of the principles of general departmental policy, implementation of the anti-corruption strategy and state program, annual anti-corruption training activities, as well as implementation of 36 measures to eliminate or minimize identified corruption risks.

During 2021–2024, all planned measures were fully implemented. The Fund ensured organization and conduct of all planned training activities and also implemented measures to minimize 100% of identified corruption risks.

Some risks that remain relevant require continuous monitoring and further analysis.

Thus, the results of the assessment of implementation of the Anti-Corruption Program for 2021–2024 confirm its effectiveness, since:

- no employee of the Fund was held criminally or administratively liable for corruption offenses;
- 100% of identified corruption risks were minimized (complete elimination of risks is not possible, since the identified risks are closely related to the human factor and are permanent in nature);
- 86% of Fund employees demonstrated a high level of knowledge in corruption prevention according to questionnaire results.

The Working Group on Corruption Risk Assessment in the Activities of the State Property Fund of Ukraine, during examination of the Fund's environment, including analysis of corruption risk assessment results from the previous period, concluded that certain functions and processes in which corruption risks had been identified, as well as sources of such risks, may persist due to specific features of legal norms or mechanisms.

This is related to the peculiarities of practical implementation of processes and/or human resources corresponding to paragraphs 6–9 of Chapter 4, Section III of the Methodology. Taking this into account, such functions and processes remain potentially vulnerable to corruption and require further improvement of control mechanisms.

8. Measures for Implementation of the Principles of the Anti-Corruption Policy of the State Property Fund of Ukraine

The State Property Fund of Ukraine continuously implements the following measures to ensure realization of the principles of anti-corruption policy:

- ✓ application of the principles of transparency and collegiality in the adoption of important decisions;
- ✓ provision of consultations to Fund employees regarding compliance with anti-corruption restrictions, requirements for prevention and settlement of conflicts of interest, and other legislative requirements in the field of corruption prevention, as well as conducting relevant training activities;
- ✓ monitoring compliance by Fund employees with anti-corruption restrictions, requirements concerning prevention and settlement of conflicts of interest, and other requirements of anti-corruption legislation;
- ✓ improvement of personnel selection procedures and verification of information concerning persons applying for positions within the Fund, including organization of special background checks for persons applying for positions involving responsible and especially responsible status;
- ✓ monitoring timely submission by Fund officials of declarations of persons authorized to perform state functions;

- ✓ timely response to reports of possible corruption or corruption-related offenses;
 - ✓ organization and conduct of internal investigations and taking measures to bring to liability persons guilty of corruption offenses, with notification of specially authorized anti-corruption entities regarding such cases;
 - ✓ fostering a culture of reporting possible corruption offenses and ensuring confidentiality of persons reporting such facts;
 - ✓ implementation of the Fund's Anti-Corruption Program, monitoring of its execution, and periodic review where grounds exist.
-