

## APPENDIX 2

### NORWEGIAN-UKRAINIAN CHAMBER OF COMMERCE ANTI-CORRUPTION POLICY

This anti-corruption policy is given force as part of NUCC's anti-corruption programme. All directors and employees of NUCC are expected to read and adhere to the below policy statement. The policy will be published on our website, and shall serve as the basis for all directors and employees in their conduct for and on the behalf of NUCC, both internally and with external third parties<sup>1</sup>.

Members, suppliers and other contracting parties of NUCC are also expected to adhere to standards which are consistent with this the anti-corruption policy, and NUCC shall do its best to ensure such adherence.

*NUCC take a zero-tolerance approach to corruption, including bribery, facilitation payments and trading in influence. It is NUCC's policy to conduct all its business with the utmost integrity and to implement and enforce effective systems to counter corruption. We are committed to act in an honest and ethical manner, with professionalism, respectfulness and fairness, in all our business dealings and relationships.*

*We will comply with all applicable anti-corruption laws and regulations wherever we operate, and take active steps to ensure that corruption does not occur in relation to NUCC's business activities. We take our legal responsibilities very seriously. If NUCC is found to have taken part in corruption it could face, inter alia, significant penalties and serious reputational damage.*

*This policy is given force as part of an anti-corruption programme endorsed by the board of directors of NUCC. All directors and employees of NUCC are required to comply with this policy.*

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<sup>1</sup>In the NUCC anti-corruption programme, the term **Third Party** includes actual and potential customers, agents, advisors, suppliers and other business partners, government and public bodies, including their advisors, representatives and officials, politicians and political parties, that NUCC personnel come into contact with during the course of their work for NUCC.