

REGULATION
on the Anti-Corruption Committee
at the European Medical University

1. GENERAL PROVISIONS.

- "The Regulations on the Anti-Corruption Committee of the European Medical University" (hereinafter referred to as the Regulations) define the organization, functions, rights, and responsibilities of the Anti-Corruption Committee (hereinafter referred to as AC) at the European Medical University (hereinafter referred to as the University).

In its activities, AC is guided by the Constitution of Ukraine, the Law of Ukraine "On Prevention of Corruption" No. 1700-VII dated October 14, 2014 (with amendments), the methodology for assessing corruption risks in the activities of government bodies approved by the decision of the National Agency for the Prevention of Corruption (NAZK) No. 126 dated December 2, 2016, the Law of Ukraine "On Approval of the Typical Regulation on the Authorized Unit (Authorized Person) for the Prevention and Detection of Corruption" No. 277/21 dated May 27, 2021, these Regulations, and other applicable legal acts.

The composition of AC is approved by the order of the University Rector based on the recommendation of the Academic Council for a term of 2 years. AC consists of the chairperson, deputy chairperson, and members of AC. The composition of AC may also include heads of University structural units, representatives of the Student Self-Government (if necessary), representatives of the public, and experts (if necessary and with their consent).

The chairperson of AC organizes its work and is responsible for the execution of the tasks and functions assigned to AC, presides over its meetings, and determines the range of issues to be considered.

In accordance with the objects of corruption risk assessment, AC develops a work plan for assessing corruption risks, which is approved by the chairperson of AC.

The work plan includes information about:

- Objects of corruption risk assessment;
- Sources of information for conducting corruption risk assessment;
- Methods and approaches to corruption risk assessment;
- Individuals responsible for conducting corruption risk assessment for each object;
- Deadlines for conducting corruption risk assessment for each object.

2. MAIN TASKS OF THE ANTI-CORRUPTION COMMITTEE.

- Preparation, provision, and oversight of measures to prevent corruption;
- Providing methodological and advisory assistance in compliance with the requirements of anti-corruption legislation of Ukraine;
- Participation in informational and scientific research support for measures to prevent and detect corruption;
- Organizational and explanatory work on prevention, detection, and counteraction to corruption;
- Verification of the timeliness of submission of declarations of property, income, expenses, and financial obligations, verification of such declarations for conflicts of interest, as well as their

logical and arithmetic control;

- Monitoring compliance with the requirements of current legislation regarding the regulation of conflicts of interest.

3. MAIN FUNCTIONS OF THE ANTI-CORRUPTION COMMITTEE.

- Development and implementation of measures to prevent corruption offenses and monitoring their implementation;
- Providing participants in the educational process of the University with explanations regarding the application of anti-corruption legislation;
- Taking measures to identify conflicts of interest and facilitating their resolution, monitoring compliance with legislation on conflict of interest regulation, and identifying risks favorable to committing corrupt offenses by University officials, as well as submitting proposals to the University leadership for mitigating such risks;
- Assisting in filling out declarations of property, income, expenses, and financial obligations, conducting checks in accordance with the law on the timeliness of submission of such declarations, checking for conflicts of interest, and performing logical and arithmetic checks of declarations;
- In case of identifying arithmetic or logical errors in the declarations during the verification, promptly notifying the relevant declarant in writing for them to provide written explanations and/or corrected declarations;
- In case of identifying facts that may indicate the commission of corrupt offenses by University officials, as well as signs of violations based on the results of checks of declarations of property, income, expenses, and financial obligations, informing the University management and law enforcement agencies, as appropriate, within their competence;
- Keeping records of participants in the educational process of the University subject to liability for committing corrupt offenses;
- Collaborating on corruption prevention and detection with specially authorized entities in the field of anti-corruption;
- Reviewing, within its competence, reports regarding the involvement of participants in the educational process at the University in committing corrupt offenses;
- Preparing a report on the results of the corruption risk assessment in the University's activities and making proposals for measures to eliminate (reduce the level of) identified corruption risks;

4. RIGHTS AND RESPONSIBILITIES OF MEMBERS OF THE ANTI-CORRUPTION COMMITTEE.

Members of the AC have the right to:

- Receive information and materials necessary for the performance of AC tasks from the University administration;
- Receive oral and written explanations from participants in the University's educational process on matters related to official investigations (checks), as well as on identified logical and arithmetic errors in declarations of property, income, expenses, and financial obligations;
- Express their position during AC meetings and participate in decision-making through open voting;
- Initiate, if necessary, the convening of AC meetings;
- Initiate, if necessary, the sending of requests to state authorities, local self-government bodies, enterprises, institutions, and organizations, regardless of their ownership form, in order to obtain

the necessary information and materials for the performance of AC tasks;

- Perform other powers related to ensuring the AC's activities in accordance with these Regulations.
- Members of the AC are obligated to:
- Participate in AC meetings;
- Comply with the requirements of these Regulations and ensure the implementation of AC decisions;
- Be impartial and objective;
- Not disclose confidential information that has become known to them in connection with the performance of their duties;

5. ORGANIZATION OF THE ANTI-CORRUPTION COMMITTEE'S WORK.

- AC employees participate in official investigations (checks) conducted in accordance with established procedures to identify the causes and conditions that led to the commission of a corrupt offense or non-compliance with the requirements of current anti-corruption legislation.
- During the conduct of official investigations (checks), AC employees have the right, taking into account the limitations established by law, to unimpeded access to documents and materials related to the subject of the official investigation (check).

The organizational form of AC's activities is meetings, which are held in accordance with the approved work plan of AC or as needed. An AC meeting is considered valid if at least two-thirds of the total number of AC members participate in it. Decisions of the AC are made by open voting by a simple majority of votes of the members of the AC present at the meeting. In case of a tie vote, the Chairman of the AC has the deciding vote.

Decisions of the AC are documented in minutes, which are signed by the members of the AC present at the meeting no later than three working days after the meeting and are kept by the Chairman of the AC. Based on the results of the corruption risk assessment, the AC prepares a report that includes:

- Identified corruption risks and their factors;
- Possible consequences of corrupt offenses or corruption-related offenses;
- Proposals for measures to eliminate (reduce) the level of identified corruption risks.

Proposals for measures to eliminate identified corruption risks:

- Involve identifying possible mechanisms to counter and prevent corruption risks;
- Aim to eliminate or minimize the conditions (causes) of corruption risks.

Proposals for measures to eliminate identified corruption risks are formed in a table of assessed corruption risks and measures to eliminate them, which is an integral part of the AC's report. The report on the results of the corruption risk assessment is approved by the University's rector.

Interference in the activities of the University's AC during the exercise of its powers, as well as assigning responsibilities to the anti-corruption committee that do not belong to its competence, exceed its powers, or hinder the performance of the tasks entrusted to it is prohibited.

6. FINAL PROVISIONS.

- These regulations come into force upon their approval. Changes and additions to these regulations are considered and adopted by the University's Academic Council and are implemented by order of the University's rector in accordance with the established procedure.
- Upon the entry into force of a new version of these regulations, the previous version becomes

invalid.