Everyone has the opportunity to contribute to the creation of a "Ukrainian dream" - a country that enables every Ukrainian to showcase their talents.

The foundation of such a Ukraine lies in the existence of virtuous and efficient organizations.

Shall we make this dream a reality together?

GUIDE FOR TOP-MANAGERS
Building a virtuous and efficient organization

CONTENTS

1. INTRODUCTION: THREATS FROM CORRUPTION AND A LEVERAGE FOR BUILDING A SUCCESSFUL COUNTRY

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What threats does corruption pose?

Firstly, corruption poses a threat **to security**, which ranks as the second most crucial human need according to Maslow's pyramid. It adversely impacts **the reputation and trustworthiness** of individuals, organizations, and entire nations. Besides impeding development, corruption creates hindrances to **the efficiency** of both private and public bodies and their top-managers. Corruption deprives people in the country of favorable conditions to realize their own potential.

Like any systemic social issue, corruption is a management problem and requires management solutions.

To help top-managers address corruption threats and provide them with effective management tools for developing virtuous organizations, the NACP has published this manual.

Integrity, as a new norm, has the potential to radically transform the situation in defense, the economy, and other aspects of life, ultimately reinforcing Ukraine and enabling all individuals to achieve their full potential. A particular responsibility falls on those members of society with significant tools of influence for nurturing integrity, namely **top-managers of organizations in both private and public sectors**.

Move from dreams to action: Cultivate virtuous and efficient organizations as the foundation for transforming Ukraine into the optimal environment for every Ukrainian to realize their talents.

" Systematic thinking and a holistic approach to strategy are the hallmarks of KMBS. This is the exact approach that was applied in the development of this manual. Virtuous organizations are open systems. A virtuous leader, who has always been a KMBS client, has now become the main client in the NACP's client list.

The manual sets out a comprehensive system and a sequence of actions on how the top-managers of both public and private organizations can establish a system based on integrity and, consequently, efficiency.

Change yourself, change your organization, change the world. "

" Ensuring progress in transparency and efficiency is crucial for Ukraine as a whole and its institutions at this moment. The war has posed a substantial challenge to our country, yet it has also profoundly shifted the mindset of Ukrainians. Now is the most suitable moment to disseminate best practices and tools, given the favorable environment and businesses' willingness to enhance their structures. Therefore, I encourage using this guide for educational and enlightening purposes. "
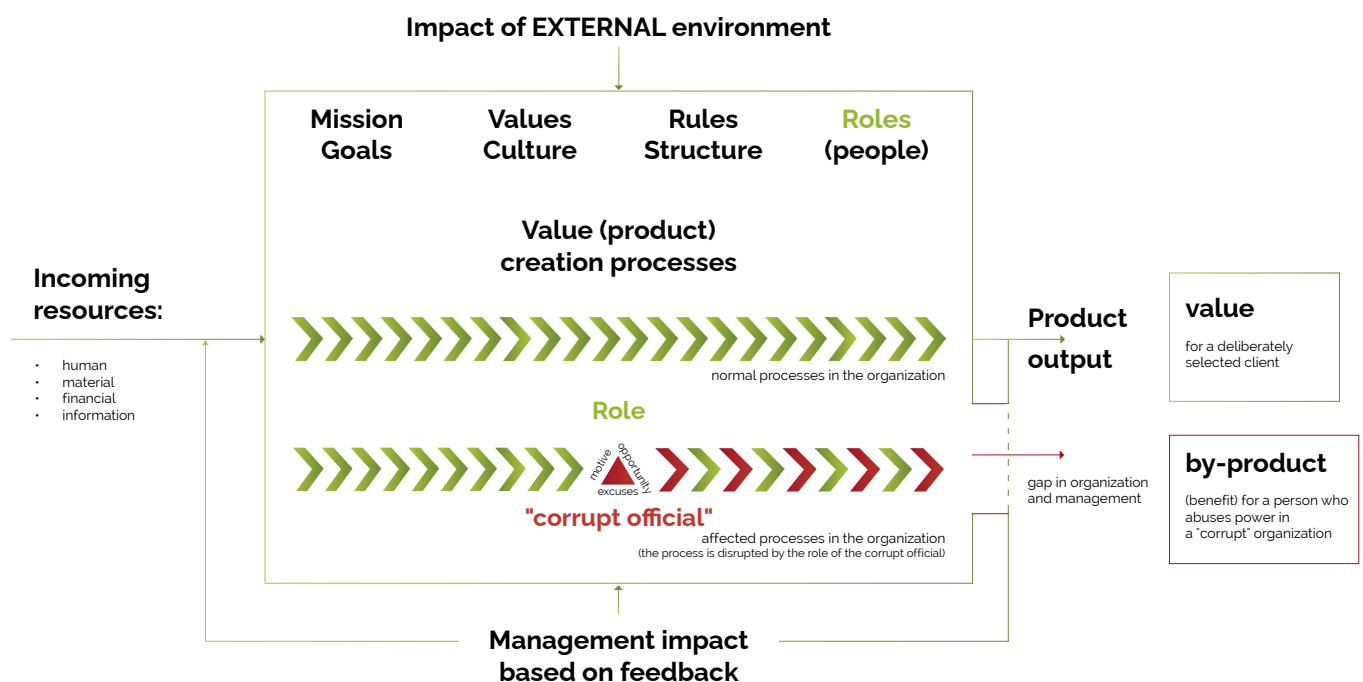
* The manual is based on the International Organization for Standardization (ISO) process standards, CMMI process improvement structures, OECD recommendations on Public Integrity and the three-line model developed by the Institute of Internal Auditors (IIA).

2. CORRUPTION AS A DISEASE OF AN ORGANIZATION:
WHERE AND WHY DOES IT OCCUR?

Corruption, the antithesis of integrity, refers to the abuse of power for personal benefit. It may manifest in governmental, civic, public, commercial, or media institutions across all sectors.

Corruption emerges when the leadership system of an organization lacks the necessary maturity to work exclusively towards the objectives for which it was formulated. **Rather than supplying their clients with the primary commodity (value)**, a corrupt entity produces a secondary **byproduct**. In this context, a by-product refers to fulfilling the 'private interest' (whether tangible or intangible) of an individual who is part of the organization.

Diagram of an organization affected by corruption

Impact of EXTERNAL environment

| Mission Goals | Values Culture | Rules Structure | Roles (people) |

Value (product) creation processes

Incoming resources:
- human
- material
- financial
- information

normal processes in the organization

Role

motive opportunity excuses

"corrupt official"

affected processes in the organization
(the process is disrupted by the role of the corrupt official)

Product output

gap in organization and management

value
for a deliberately selected client

by-product
(benefit) for a person who abuses power in a "corrupt" organization

Management impact based on feedback

No social system, aside from an organized criminal group, aims to engage in corruption. When an organization strays from its intended mission, it signifies a **management disease**. Fortunately, there is a remedy for such a disease.

3. HOW CAN I BUILD AN ORGANIZATION THAT IS IMMUNE TO CORRUPTION? INTEGRITY AS A CONDITION OF A HEALTHY ORGANIZATION

What do a human body and a private or public organization have in common? **Both are systems, which are holistic entities** made up of identical components.

Each system has:
- a defined goal;
- elements;
- connections between these elements (elements interact dynamically according to certain rules in open systems and are statically connected in closed systems).

integral open «living»   individual parts in a static
system   closed system

A system arises as a consequence of the dynamic interplay among its constituent components - both internally and with the surroundings. Every component has a specific function and defined guidelines for interacting (linkages) to accomplish the ultimate goal of the system. Organisms' primary goal is survival, while human-made systems and organizations strive to unite and achieve their mission or purpose established during creation.
Everyone can change systems by influencing their goals.

When examining public and private organizations as systems, in order for them to achieve 'immunity' from corruption, it is necessary for them to uphold certain principles:
- have a clearly defined goal of the activities and follow it;
- define the roles of each element (employee) within;
- establish effective communication (interaction) between the elements (employees).

To establish all of the required processes within the organization, a **management function** is necessary.

Picture: https://www.prestonsputting.com/single-post/2016/02/09/the-order-of-chaos

Maturity levels of CMMI management systems*

5 Optimizing		**Continual improvement** of processes, culture management, quick implementation of new ideas
4 Measurable		Processes are **measured** and **controlled**, **automated** unified performance management system
3 Defined		Processes are **organized**, Mission and Strategy are being implemented
2 Managed		Processes are **partially described**, most often they appear in response to certain events
1 Initial		Processes are **unpredictable**, chaotic, poorly organized

CMMI Capability Maturity Model Integrated is a process improvement system

Management systems within organizations have varying levels of maturity, ranging from disorganized and chaotic, to well-constructed, perfected processes. **A mature management system eradicates the causes of corruption, whereas an immature one creates a breeding ground for it**. If corruption can be classified as a disease, then integrity serves as prevention and indicates the organization's healthy condition.

What is the meaning of integrity? **The term integrity has two primary definitions in English: holism and virtue, specifically honesty.**

If we consider *integrity* as the **state of being holistic**, it refers to a system that is entirely operational and undamaged. A comprehensive system (organization) functions in accordance with the set parameters (defined objective) and is organically incorporated with other systems.

For the human body, integrity is maintained when its individual parts are properly interconnected and operate smoothly. It is challenging to visualize a hand that would efficiently perform its function separately from the body. Similarly, public or private organizations display integrity when their individual segments (employees) have established links (interactions) with one another and work towards achieving a common aim. For example, it is difficult to imagine a modern organization functioning without IT. The lack of technical support would make its operations either impossible or less efficient.

In moral terms, *integrity* is a virtue that entails making decisions and taking actions based on one's values and principles. In official settings, employees are considered virtuous if they fulfill their duties with honesty, competence, and full dedication. In simple terms:

integrity is doing the right thing, even when no one is watching.

Integrity is synonymous with efficiency and is indicative of a mature management system, sound structure, streamlined processes, well-trained personnel, and personal maturity within the organization.

3 Fostering integrity and fighting corruption in the defense sector. Collection of examples (compendium) of positive experience. NATO-DCAF, (2010)

4. WHY WE SHOULD BUILD VIRTUOUS (EFFICIENT) ORGANIZATIONS: MAIN ADVANTAGES

4.1. Security - Effective internal control and risk management systems are crucial in preventing criminal prosecution, legal disputes and sanctions.

Example: The total amount of losses incurred solely by state-owned companies in Ukraine due to corruption between 2019 and 2021 amount to more than UAH 20 billion (more than 0,5B USD). The top-managers of these companies are currently under investigation in hundreds of cases and are involved in thousands of court proceedings.

4.2. Efficiency is the capability to achieve goals while utilizing well-established procedures with the minimal resource expenses, promptly addressing all varieties of internal and external challenges, and continually enhancing manageability.

Example: The sorting center of Ukrposhta in Kherson suffered shelling and damage by russian missiles on the morning of 21.03.2023. However, within a few hours, it had already resumed functioning[4].

4.3. Positive reputation fosters trust, facilitates collaboration with suppliers, partners, and regulatory authorities, and enables the recruitment of top-tier employees.

*Example: **78%** of consumers prefer buying from companies with a positive reputation, whereas only 9% are willing to purchase from a company with a negative one. **70%** of individuals are willing to work for a company with a high reputation index, in contrast to **11%** only wanting to work for a company with a low one[5]. Additionally, **46%** of job seekers consider corporate culture to be a crucial element when deciding on a place of employment[6].*

5. BUILDING A VIRTUOUS (EFFICIENT) ORGANIZATION STEP-BY-STEP

The top-manager is accountable for maintaining the integrity and efficiency of any organization as per the legislative documents and regulations prescribed in Part 2 of Article 61 of the Ukrainian «Law on Prevention of Corruption».

The Integrity maturity levels model, which aims to prevent corruption within an organization, is similar to any CMMI model detailed in Section 3. It comprises of three sections - culture, system, and accountability - and five different maturity levels. By implementing measures from this model, an organization can become virtuous and effective. The model can be found in Annex 1 or accessed here.

To establish a virtuous organization, starting with a reasonable maturity level of maturity, it is advised that the top-manager adheres to the following sequential process:
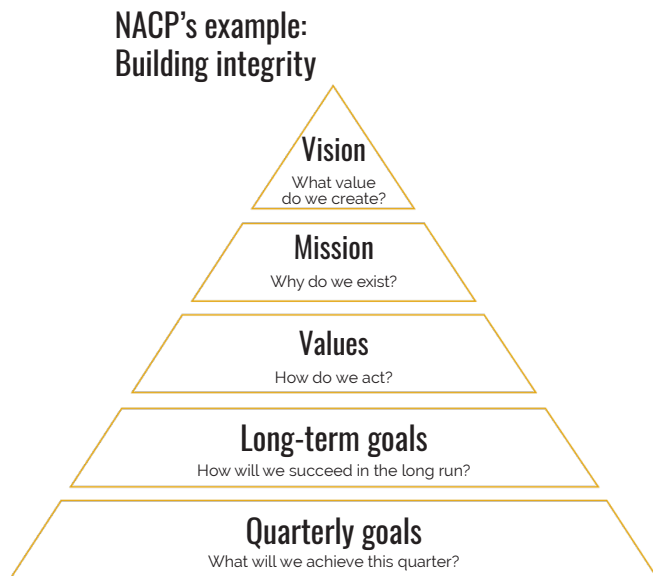
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4 https://t.me/igorsmelyansky/2060?single
5 Research «2020 Global RepTrak», Reputation Institute 2020-2021: https://www.rankingthebrands.com/PDF/Global%20RepTrak%20100%20Report%202020,%20Reputation%20Institute.pdf
6 Leading platform for employee communication, analysis, and advocacy with measurable business impact: https://haiilo.com/blog/the-importance-of-company-values

Step 1. Determine the current integrity maturity level of the organization by comparing the present state of affairs with control indicators in line with the Capability Maturity Level Model Integrated (Preventing Corruption) in the organization, detailed by sections.

Step 2. The top-manager, in conjunction with their management team, ought to establish the organization's mission, vision and values, and specifically include integrity as one of the core values. Furthermore, they should deliberately select a management system to effectively coordinate and monitor the achievement of goals.

NACP's example:
Building integrity

Vision
What value do we create?

Mission
Why do we exist?

Values
How do we act?

Long-term goals
How will we succeed in the long run?

Quarterly goals
What will we achieve this quarter?

VISION
Ukraine is the ultimate destination for unleashing the full potential of every Ukrainian talent

MISSION
We build a virtuous government and a fair society We make the public sphere accountable, corruption unacceptable, and anti-corruption processes efficient, convenient and easy

VALUES
- **Integrity.** "Act honestly, even when no one is watching"
- **Interaction.** "Together we can do anything"
- **Responsibility (for quality and result).** "No imitation. We change the essence, not the form"
- **Development.** "Be better tomorrow than today"
- **Ambition.** "Who but us? When, if not now?"

LONG-TERM GOALS (OKR)
- NACP has become the standard for a state institution
- Public service and corruption practices are not compatible
- Public organizations, businesses and their leaders have become virtuous through the implementation of anti-corruption policies
- Ukrainians choose virtuous behavior as the key to success

NACP uses the strategic management and goal-setting system known as OKR (Objects and Key Results)[7] to foster genuine employee engagement and unlock the creative potential of each team member towards a shared vision for the organization's aims.

Step 3. Appoint an Integrity Officer (for preventing and detecting corruption)

Given the top-manager's time constraints, the proactive officer should be responsible for implementing integrity policies, including managing conflicts of interest, gift policies, and reviewing whistleblower reports.

Recommended qualifications for this position are outlined in Annex 2. If the organization has up to 50 employees, the officer's responsibilities may be assigned to a part-time position. For organizations with 50 to 200 employees, it is advisable to create a distinct role within the staffing structure. For organizations with over 200 employees, it is recommended to form a separate department. In all cases, the officer must report directly to the head of the organization[8].

Example of successful practice:

At the state enterprise «Medical Procurement of Ukraine,» the Officer holds the position of Deputy General Director. In 2022, the enterprise was awarded an international certificate for compliance with the anti-corruption standard ISO 37001:2016. This certification is only held by 20 medical organizations worldwide[9].

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7 https://nazk.gov.ua/uk/documents/poryadok-upravlinnya-nazk-za-okr/
8 https://zakon.rada.gov.ua/laws/show/z0650-21#Text
9 Medical procurement of Ukraine received an international certificate according to the anti-corruption standard ISO 37001:2016: https://medzakupivli.com/uk/ antykoruptsiina-diialnist/news/28882-medzakupivli-ukrainy-otrymaly-mizhnarodnyi-sertyfikat-za-antykoruptsiinym-standartom-iso-370012016

Step 4. Demonstrate the importance of promoting integrity through your own conduct.

OECD suggests[10] that top-managers should determine the appropriate level of balance between a rule-based and value-based approach to integrity.

Approaches that prioritize adherence to administrative procedures and regulations (compliance) establish a basic level of integrity. However, a value-driven integrity strategy fosters an environment where values serve as the shared foundation for daily duties and decision-making for all staff members.

BALANCING RULES- AND VALUES-BASED INTEGRITY STRATEGIES

	Rule-based strategy	Values-based strategy
Objective	Prevent misconduct	Enable responsible conduct
Ethos	Conformity with externally imposed standards	Self-governance according to chosen values and standards of conduct
Management	Lawyer/ compliance officer-driven	Management-driven with the aid of integrity and ethics counsellors, and HR and legal officers
Behavioral assumptions	Autonomous beings guided by material self-interest	Social beings guided by values, standards of conduct, peers
Standards	Criminal and regulatory law	Code of ethics, code of conduct and related policies, regulations and laws
Staffing	Lawyers/ HR/ compliance officers	Integrity officers, HR, managers
Method	Education in existing legal framework, compliance standards and systems, reduced discretion, misconduct reporting, audit and controls, investigation processes, sanctions, etc.	Strengthen ethical competence of public officials through development of organizational values, education and training on values and standards of conduct, integrity training and ethics counselling, leadership and managerial role modelling, accountability, transparency, integrity frameworks, auditing, sanctions, mainstreaming values into the daily processes of the administration, communication and raising awareness

Example:

Based on the findings of the Global Integrity report by Ernst & Young GmbH for 2022[11], 97% of survey participants (both employees and managers) emphasized the significance of integrity within their organisations. Furthermore, in 2021, experts at Forbes ranked integrity as the second most crucial quality for a contemporary top-manager, after confidence[12].

Step 5. Organize a corruption risk assessment and identify measures to minimize them.

Example:

The management board and executive director of an Italian company, accused of unfair behavior during international business operations, have assumed personal responsibility for the evaluation of risks, implementation of anti-corruption measures, and open dialogue with employees[13].

10 OECD Public Integrity Handbook, 2020: http://surl.li/efoon
11 EY Global Integrity report 2022: https://www.ey.com/en_gl/forensic-integrity-services/how-a-focus-on- governance-can-help-reimagine-corporate-integrity
12 Forbes expert article: URL: https://www.forbes.com/sites/forbescoachescouncil/2021/10/04/five-qualities-to-cultivate-on-your- path-to-leadership/?sh=2bf8a277284b
13 Anti-Corruption Ethics and Compliance Handbook for Business. OECD - UNODC - World Bank, 2013. 128 p.: http://surl.li/efpqz

Step 6. Approve the process of screening job candidates for compliance to the value of 'integrity', analyzing regulatory and individual actions, and evaluating counterparties.

The OECD advises guaranteeing a transparent and competitive recruitment process that assesses applicants on their qualifications, experience, and personal attributes[14]. The NACP has provided guidance on verifying candidates for roles vulnerable to corruption risks[15].

Example: Part of Australian company Veolia's standard agreement with suppliers includes an anti-corruption clause that outlines the parties' responsibility to comply to anti-corruption laws[16]. 96% of UK employers conduct reputation checks on job applicants during the recruitment process[17].

Step 7. Approve the Integrity Program (Anti-Corruption Program)[18],
including policies on identifying and resolving conflicts of interest, accepting and giving gifts, adhering to a code of ethics, reporting and protecting whistleblowers, and interacting with regulatory and law enforcement authorities.

Good practice: The business conduct and ethics code of Capital Ship Management Corp mandates that employees report conflicts of interest to both themselves and their colleagues. They must also maintain a register of gifts and entertainment. Before accepting or giving a gift, the employee must seek guidance from their manager or legal department[19].

Step 8. Identify channels for whistleblowing
When implementing compliance development within an organization, a conscientious top-manager ought to offer a chance to report any potential shortcomings in the management system.

We use channels for individuals who report misconduct by operating the whistleblowers' reports portal[20] which was created by the National Agency to allow for secure and anonymous submissions.

Good practice: In 2014, the Swedish telecommunications company Telia established its own internal reporting system for whistleblowers, known as the Speak-Up Hotline. In the initial twelve-month period, this system facilitated the detection of fraudulent activities during procurement operations[21].

Step 9. Ensure the internal audit division's independence and efficiency, with a focus on continuous improvement.

Good practice: The economic impact of the Ministry of Defense's Internal Auditors' activities between 2018 and 2020 surpassed UAH 20.5 billion[22](0,57B USD). A team of NATO experts recognized in their 2019 report on building integrity that the Ministry's internal auditing consistently adheres to international standards set by the World Institute of Internal Auditors[23].

14 OECD recommendation on corruption risk management. URL: https://www.oecd.org/corruption/oecd-recommendation-for-development-cooperation-actors-on-managing-risks-of-corruption.htm
15 Recommendations for conducting verification of candidates for positions and criteria for positions that are vulnerable to corruption risks are defined in the methodological recommendations of the NAPC on conducting verification of candidates for positions that are vulnerable to corruption risks: https://nazk.gov.ua/wp-content/uploads/2022/11/perevirka-kandydativ-na-posady.pdf
16 Anti Corruption Clause | Veolia Australia and New Zealand
17 National Survey. Employers Universally Using Background Checks to Protect Employees, Customers and the Public: https://pubs.thepbsa.org/pub.cfm?id=6E232E17-B749-6287-0E86-95568FA599D1
18 https://zakon.rada.gov.ua/laws/show/z1702-21#Text
19 Internal policies of Capital Ship Management Corp: https://www.capitalship.gr/policies
20 https://whistleblowers.nazk.gov.ua/#/
21 Interesting Examples Of Whistleblowing In The Workplace. COMPLYLOG. JUNE 10, 2021. URL: https://blog.complylog.com/whistleblowing/examples-of-whistleblowing-in-the-workplace/
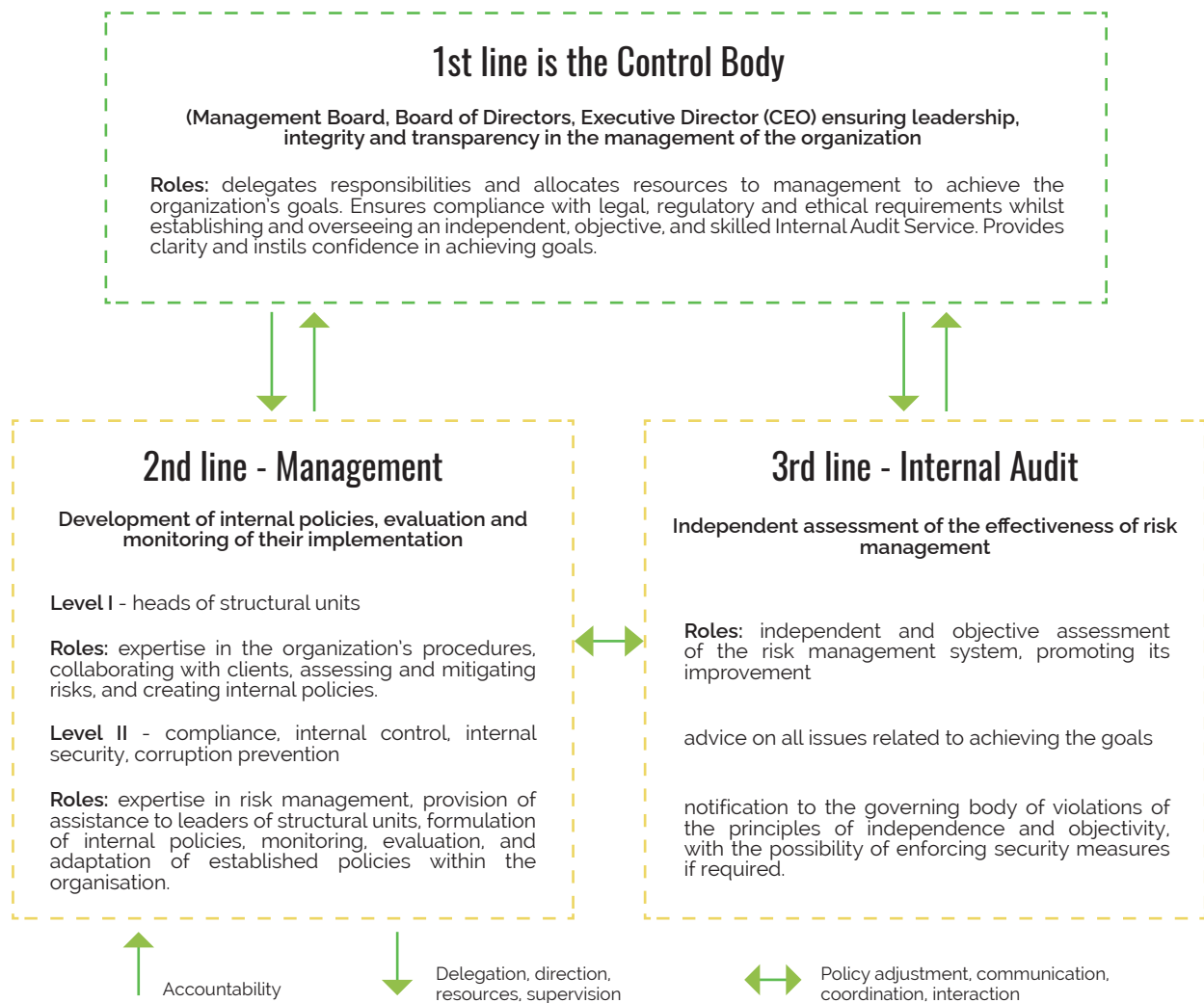22 https://www.mil.gov.ua/content/files/whitebook/WB_2020_FINAL.pdf, pages 16-18
23 https://nazk.gov.ua/wp-content/uploads/2019/11/41211089dod1-3.pdf

6. CORRELATION OF THE INTEGRITY MATURITY LEVELS MODEL AND THE THREE-LINE MODEL

The Integrity maturity levels model, developed from the CMMI management system maturity level model, is a complement to the Three-Line model (formerly the Three Lines of Defense model until 2020) of the Institute of Internal Auditors. This model has served as the basis for risk management programs for many organizations for years.

The Three-Line model enables the organization to identify the processes that optimize goal achievement and enhance effective management, with a focus on risk management. The Integrity maturity levels model outlines the steps to foster integrity. This complements the integrity strategy anchored on policies (compliance) with tools founded in values.

1st line is the Control Body

(Management Board, Board of Directors, Executive Director (CEO) ensuring leadership, integrity and transparency in the management of the organization

Roles: delegates responsibilities and allocates resources to management to achieve the organization's goals. Ensures compliance with legal, regulatory and ethical requirements whilst establishing and overseeing an independent, objective, and skilled Internal Audit Service. Provides clarity and instils confidence in achieving goals.

2nd line - Management

Development of internal policies, evaluation and monitoring of their implementation

Level I - heads of structural units

Roles: expertise in the organization's procedures, collaborating with clients, assessing and mitigating risks, and creating internal policies.

Level II - compliance, internal control, internal security, corruption prevention

Roles: expertise in risk management, provision of assistance to leaders of structural units, formulation of internal policies, monitoring, evaluation, and adaptation of established policies within the organisation.

3rd line - Internal Audit

Independent assessment of the effectiveness of risk management

Roles: independent and objective assessment of the risk management system, promoting its improvement

advice on all issues related to achieving the goals

notification to the governing body of violations of the principles of independence and objectivity, with the possibility of enforcing security measures if required.

Accountability

Delegation, direction, resources, supervision

Policy adjustment, communication, coordination, interaction

Annex 1

INTEGRITY MATURITY LEVELS MODEL IN AN ORGANIZATION BY LEVELS

Level	Description
Initial (chaotic, ad hoc)	There is a lack of an integrity system to prevent corruption, with only selective compliance with legislation. The top-manager demonstrates no attention towards integrity, and only reacts when investigations against the top-manager or employees arise. The organization values are undefined, and the functions of the commissioner are performed by a part-time employee. Additionally, there are no standards or established processes for notification review, risk management, or reporting on corruption channels. No audit has been conducted.
Managed	Basic methods of maintaining integrity and preventing corruption have been established within the organization. The top-manager has identified integrity as a core value and regularly communicates this message through the mission and vision statements. During employee selection, integrity is one of the primary factors considered. An integrity officer has been appointed to provide guidance to employees on maintaining integrity within the workplace. The "Integrity Program (Anti-Corruption Program)" or other document on corruption risk management has been implemented. Channels to report corruption and protect whistleblowers have also been established. Analysis of existing and potential counterparties, settlement of conflicts of interest, and assessment and minimization of corruption risks are regularly conducted. Nonetheless, these policies may not be entirely implemented, unfamiliar or incomprehensible to all personnel. The integrity system audit is carried out during the audit of other functions.
Defined	Standardized integrity system (prevention of corruption): The organization has established a planned and coordinated system for compliance with legislation under the guidance of the manager. The organization's values are closely aligned with those of its employees. The authorized person is independent and has the necessary resources. The policies and procedures are concise, and an integral part of the integrity program which is communicated to and implemented by all employees. Established channels enable easy reporting of any corruption incidences. All necessary information on preventing corruption is actively communicated both within and outside the organization. The inclusive corruption risk assessment process is coordinated with the strategic planning. Regular training for the officers and employees is provided, with a separate performance audit of the authorized division (commissioner) being conducted.
Measurable	The top-manager of the organization sets and evaluates the objectives of the integrity system, which aim to prevent corruption. Besides having a prescribed compliance program, the organization employs data and metrics to assess the efficacy of its operations, while keeping its staff closely aligned with ethical values. Every measure implemented to minimize exposure to corruption risks undergoes analysis and evaluation, even with external expert and public consultation. Performance indicators are published for transparency, and compliance with standards is integral to strategic planning and integrated into operational processes. The prevention of corruption is inseparable from ethical conduct, and the entire integrity system undergoes thorough auditing.
Optimizing	The corruption prevention system is stable, transparent, and easily understandable to all within the organization. Its continuous improvement is driven by the top-manager's active promotion of integrity both internally and externally, encouragement of innovation, personal communication with employees regarding detected violations, and active participation in investigations. Integrity is of the utmost importance during employee selection procedures and is regarded as a key value for all decision-making processes. The organization continually enhances its data-driven policies and procedures, adapts nimbly to changes, observes best practices, and implements them. Compliance is recognized as a strategic advantage that is fully integrated into the culture, while ethics is considered an essential attribute of corporate culture. An external audit of the entire integrity system is regularly conducted.

For convenience, the levels are linked to colors.

- **Initial (chaotic, ad hoc):** Red. This color can indicate danger or require attention, indicating that processes are not yet organized, and there is a high risk of corruption.
- **Managed:** Orange. This is a shade between red and yellow that signifies progress, but there are still potential hazards.
- **Defined:** Yellow. It represents the standardization, clarification of the path and a degree of optimization.
- **Measurable:** Green. The color of light at the traffic signal indicating "go". Processes are optimized and efficiently managed using metrics.
- **Optimizing:** Blue. It symbolizes depth, wisdom and stability. At this level, the organization has reached a high level of maturity and is constantly improving.

INTEGRITY MATURITY LEVELS MODEL IN AN ORGANIZATION: BY LEVELS AND SECTIONS*

*digital marks on the second level – the recommended sequence of steps for building a virtuous (efficient) organization. The true effectiveness of an organization begins at the fourth level, and the long-term effectiveness begins at the fifth level of maturity.

Sections	Culture				System			Accountability		Supervision: performance audit of integrity system
Levels	Role of the manager (Tone at the Top) - leadership	Values: integrity and corporate culture	Development: education in the organization	Openness	The role of the Integrity Commissioner (prevention and detection of corruption)	Integrity strategy: policy and procedure standards	Managing corruption risks	Analysis of draft acts and candidates for positions and contractors (Due Diligence)	Law enforcement: message channels and working with whistleblowers	
I. Initial (chaotic, ad hoc)	• The organizational integrity infrastructure, specifically the anti-corruption framework, is currently not receiving adequate attention from the managerial level • There is a notable absence or scarcity of regular meetings between the top-manager and the individual responsible for fulfilling the duties of the Integrity Officer role	• The organization currently lacks a structured initiative for developing corporate ethics, evident by the absence of a formal Code of Ethics or any comparable document • The organization has not established a set of defined values	• The organization does not offer systematic training programs for its staff concerning integrity and the prevention of corruption. Additionally, any existing activities in this regard appear to be sporadic and lacking a structured approach. • The Officer responsible for overseeing integrity matters does not consistently provide advice to employees on the application of anti-corruption legislation, showcasing a lack of systematic guidance in this critical area	• The organization's official media pages do not reflect any activities related to integrity building or the prevention of corruption • The section dedicated to integrity building (prevention of corruption) within the organization is either absent, incomplete, or contains outdated and irrelevant information • The organization does not provide reports on its integrity building activities or efforts to prevent corruption, thereby lacking transparency and accountability in this crucial area	• The organization does not designate a dedicated employee specifically focused on integrity building, prevention, and detection of corruption. Instead, these responsibilities are amalgamated, part-time, or assigned to other roles within the organization • The individual tasked with the Officer's functions responsible for integrity building, prevention, and detection of corruption lacks a dedicated budget for implementing necessary measures, potentially hindering the effectiveness of these crucial responsibilities	• The organization lacks established procedures and policies, beyond those mandated by law, for integrity building and the prevention of corruption • Currently, all processes related to integrity building occur in a chaotic manner, primarily as reactive responses to requests or instances of violations, criminal investigations, and other incidents. This reactive approach may impede the development of a proactive and comprehensive integrity framework	• The organization does not conduct corruption risk assessments, or if conducted, it lacks an organized system or standardized process, resulting in a random and inconsistent approach • The corruption risk assessments are not based on approved methodologies sanctioned by the authorized body or recognized international standards and regulators. Instead, they are influenced by the preferences of the Officer and management, indicating a deviation from established best practices • There is a lack of systematic implementation of measures to minimize corruption risks within the organization. Additionally, the responsible parties for executing these measures are not clearly identified	• The Officer responsible for integrity matters does not consistently approve draft documents nor systematically analyze them for potential corruption risks • The Officer lacks the requisite knowledge or does not systematically apply it to analyze draft acts for corruption risks. Furthermore, there is no systematic process for vetting candidates for positions and contractors for integrity under the purview of the Officer's responsibilities	• The organization lacks clearly defined channels for reporting corruption, leading to random and inadequate processing of notifications, complaints, and appeals related to corruption • Mechanisms for protecting whistleblowers have not been implemented, posing a potential risk to individuals who may raise concerns about corruption within the organization • There is a lack of communication regarding corruption reporting channels and measures to protect whistleblowers, indicating a deficiency in promoting a culture of transparency and accountability • The organization does not maintain a separate record for reports of corruption, and criteria for differentiating them from other types of citizens' appeals and employee complaints are not defined	• The audit of the Officer's activities is either not conducted or is carried out in an unsystematic manner, primarily due to the absence of approved procedures within the organization • Integrity issues, specifically related to the prevention of corruption, are not taken into consideration during the audit of other functions within the organization

13

Sections / Levels	Culture				System		Accountability			Supervision
	Role of the manager (Tone at the Top) - leadership	Values: integrity and corporate culture	Development: education in the organization	Openness	The role of the Integrity Commissioner (prevention and detection of corruption)	Integrity strategy: policy and procedure standards	Managing corruption risks	Analysis of draft acts and candidates for positions and contractors (Due Diligence)	Law enforcement: message channels and working with whistleblowers	Supervision: performance audit of integrity system
II. Managed	• **3.** The top-manager stresses the significance of constructing the integrity (anti-corruption) framework within the organization to the staff but does not engage in the process directly • The top-manager communicates with the Officer infrequently (less than once a quarter) • The top-manager highlights the significance of employing best practices and implementing the "zero tolerance for corruption" principle during meetings and communication of a general nature	• **1.** The organization has developed its mission, vision and values with integrity at the core • During employee selection, integrity is a crucial factor evaluated and clarified • The organization's values are determined through employee discussions and consideration of the organization's main functions • A foundational document outlining ethical conduct of its employees, a formal document outlining "Regulations," "General Rules," or a "Code of Professional Ethics" exists within the organization. • However, not all employees are sufficiently familiar with its contents due to the lack of an effective monitoring mechanism	• **9.** The organization routinely delivers foundational training on promoting integrity and preventing corruption, although it may not encompass all subjects or personnel within the organization • A yearly program has been developed for hosting training events throughout the organization. • A format has been established in which employees of the organization can get advice from the Officer (specific consultation hours per week are determined/via a specific email address, etc., on what issues)	• **10.** The organization has a dedicated webpage on their official website which focuses on integrity building, specifically the prevention of corruption. However, the page is not fully completed. • Regular updates on the organization's efforts towards integrity building and corruption prevention can be found on their social media pages	• **2.** The organization has a designated officer who is provided with the necessary means to conduct business. However, their responsibilities within the company are not clearly defined • The officer's position, both in terms of status and level of remuneration, does not correlate with the positions of middle-level managers • The organization has established the structure of the authorized unit, however, the allocation of roles amongst employees is unclear and the regulations lack precise definition of responsibilities and authority • The organization assigns a shared budget for various functions including the development of integrity and anti-corruption measures • The Officer is not involved in analyzing long-term programs and projects during their planning and development stages, particularly those requiring substantial funding, for the presence of corruption risks	• **6.** The organization has approved the "Integrity Program (Anti-Corruption Program)" comprising of policies and procedures to prevent and detect corruption • The focus is on identifying and resolving conflicts of interest, verifying current and potential counterparties, evaluating potential candidates for positions, especially in regards to their adherence to the value of "integrity," and assessing corruption risks and ways of managing them • Disclosure and protection of whistleblowers, a code of ethics, gift acceptance and donation policies, and interaction with regulatory and law enforcement agencies are among the key policies and procedures governing organization • Disclosure and protection of whistleblowers, a code of ethics, gift acceptance and donation policies, and interaction with regulatory and law enforcement agencies are among the key policies and procedures governing organization. However, not all staff are familiar with them, which can hinder understanding, identification, and resolution of related issues	• **4.** The organization has established procedures and policies that organize the process of assessing the risks of corruption (such as the methodical character of this procedure. • The organization clearly specifies the primary functions that are thoroughly evaluated for corruption risks • The corruption risk assessment results in the formation of a register comprising corruption risks and corresponding measures for minimization. Each event is assigned a specific performer, deadline and performance indicator	• **5.** At a fundamental level, the organization has approved the procedure for analyzing acts within the company for corruption risks, as well as verifying the integrity of potential candidates and counterparties. Additionally, the templates for outlining identified corruption risks are not standardized • However, the processes for scrutinizing acts and counterparties may not be entirely integrated into the organization's activities and may exclude the evaluation of all high-risk transactions and existing acts	• **7.** The organization has established channels for reporting instances of corruption, which include email, hotline, and other channels as required by law • The fundamental documents on safeguarding whistleblowers and reviewing corruption reports, which may not be well-known to all staff members, have been sanctioned • The organization communicates to its employees about the channels to report corruption and measures to shield whistleblowers regularly, at least every two years • The system for separately accounting corruption reports is operational. Algorithms have been set to distinguish them from other citizens' appeals, as well as employee complaints regarding unethical behavior of colleagues or flawed work processes	• **8.** The organization has established formal audit procedures to evaluate the effectiveness of measures aimed at promoting integrity and preventing corruption • To audit the integrity system, it is necessary to plan the audit process, analyze the internal environment of the organization, gather information from both open and closed sources and conduct employee interviews. Recommendations will then be provided to the Officer and reported to the manager • Additionally, the issue of integrity and corruption prevention is evaluated during the audit of other functions of the organization at minimum once every three years

Sections	Culture				System		Accountability			
Levels	Role of the manager (Tone at the Top) - leadership	Values: integrity and corporate culture	Development: education in the organization	Openness	The role of the Integrity Commissioner (prevention and detection of corruption)	Integrity strategy: policy and procedure standards	Managing corruption risks	Analysis of draft acts and candidates for positions and contractors (Due Diligence)	Law enforcement: message channels and working with whistleblowers	Supervision: performance audit of integrity system
II. Defined	• The top-manager plays an active role in promoting a culture of integrity, including the prevention of corruption, by fostering collaboration among the authorized division and other departments within the organization, as well as during communication with employees • Additionally, the manager is directly involved in identifying the key goals for the Officer unit and regularly receives progress reports on the achievement of these goals	• The company has ratified a code of conduct for virtuous and ethical behavior, and all workers (including those newly recruited) are familiar with • The company has instituted a protocol for addressing infringements on the guidelines of the code of ethics, either through appointing an autonomous Officer to investigate such cases or assigning them to a disciplinary council or implementing a distinct mechanism to tackle ethical breaches, that has been consented to by employees • The organization's principles are in line with the values of its employees	• Organization offers frequent, extensive training to all team members covering important subjects such as asset declaration, conflict of interest, and prevention and identification of corruption within procurement and recruitment • Additionally, the officer proactively communicates with employees about the availability of guidance via informative posters, banners, and informational materials.	• The organization's website has a dedicated page for the development of integrity, specifically preventing corruption. On this page, you can find all regulatory documents governing the activities of the authorized unit, covering approved policies and procedures within the organization. Additionally, the page includes information about all channels for reporting corruption, work plans, reports, and more • The social media pages of the organization frequently share updates regarding the operations of the authorized unit	• The organization has designated an Officer or authorized unit with sufficient funds and resources to carry out its activities • The position of the Officer is classified as that of a middle-level manager, and the remuneration reflects this status • The job descriptions and regulations for the authorized unit have been approved, clearly outlining duties, powers, and guarantees of independence • The organization has a designated budget for the implementation of fundamental steps towards fostering integrity, preventing and detecting corruption under the purview of the Officer	• The policies and procedures outlined in the preceding section "Integrity Program (Anti-Corruption Program)" have been approved, communicated to all staff members and are currently being enforced by the Officer	• The entity has established a consistent process to evaluate corruption risks. This process is comprehensive and well-documented, and all members of the entity are informed about it and encouraged to participate • The outcomes of the methods to mitigate corruption risks are scrutinized and factored into subsequent evaluations • Corruption risk assessment results are considered in the strategic planning of the organization's activities and development	• This includes a systematic analysis of both projects and existing rules within the organization • Procedures have been established to verify the integrity of candidates for positions and potential/existing business partners • Clearly defined procedures exist for analyzing documents to identify corruption risks • There are established procedures for mitigating any identified corruption risks during the analysis	• Clear channels for reporting corruption within the organization are well-defined and communicated to all employees, including third parties such as suppliers, contractors, clients, and partner organizations • Algorithms for reviewing and addressing corruption reports are established, and each request's processing status is closely monitored • The organization hosts awareness and information events on reporting channels for corruption at least once annually • The organization effectively implements measures to safeguard individuals who report wrongdoing	• The Officer undergoes a separate performance audit every three years to evaluate their performance • We are currently implementing procedures to analyze the audit results and develop an action plan to eliminate any identified shortcomings • We conduct regular specialized training for auditors, in case the organization has an internal auditor position or a corresponding role)

Sections		Culture				System		Accountability			
Levels		Role of the manager (Tone at the Top) - leadership	Values: integrity and corporate culture	Development: education in the organization	Openness	The role of the Integrity Commissioner (prevention and detection of corruption)	Integrity strategy: policy and procedure standards	Managing corruption risks	Analysis of draft acts and candidates for positions and contractors (Due Diligence)	Law enforcement: message channels and working with whistleblowers	Supervision: performance audit of integrity system
IV. Measurable		• The manager establishes clear goals and requirements for the authorized unit, which can be measured and evaluated thoroughly both quantitatively and qualitatively • The manager frequently assesses the execution of set objectives in collaboration with the authorized unit • The manager frequently receives progress reports from the authorized unit regarding the achievement of goals, and also devises fresh goals based on the	• The organization records instances of unethical conduct and takes measures to address specific cases, as well as employing a reliable feedback system that allows employees to comment on the organization's ethical values and the implementation of its ethical policies • Utilizing collected statistical data, the organization regularly enhances its corporate culture (at least once annually) • Integrity is highly valued within the organization	• Employee feedback forms and pre-and post-training knowledge assessments are continually introduced to evaluate and enhance training programs' quality and effectiveness • Organization systematically collects consultation data, including the frequency of employee requests, topics discussed, and the resolution of any issues by the Officer	• The organization's website, which is aimed at preventing and detecting corruption, not only showcases the components highlighted earlier, but also effectively presents statistical data in a clear manner	• The Officer position, in terms of status and remuneration level, holds considerable managerial responsibility • To ensure efficiency, the authorized unit implements an approved OKR or KPI system • The Officer has a designated budget for the implementation tasks of the majority of their necessary measures for integrity building (prevention of corruption), for example, such as purchasing services, software for checking counterparties, developing training courses, etc	• Policies and procedures are not only approved for implementation by the authorized unit, but also refined based on data collected by the unit, including the number of program and ethics breaches, the areas of the organization in which they occur, the most common violations and the resulting outcomes after resolution	• When determining measures to minimize identified corruption risks, measurement goals are set • Measures to minimize corruption risks are regularly monitored • When assessing corruption risks, statistical analysis is used to understand the distribution of corruption risks and their impact on the organization; correlation and causal relationships between identified corruption risks and the organization's activities are analyzed	• All analysis of acts regarding corruption risks is documented according to a clearly defined template. This allows for data collection on the areas of activity within the organization where corruption risks are most commonly identified • The verifications of integrity for candidates, potential counterparts, and current counterparts are documented using a specific template. This makes it possible to determine the riskiest aspects of such verifications • Experts and the general public actively participate in scrutinizing regulatory legal documents, such as those used in state and regional institutions to identify potential corruption risks	• Corruption reporting channels and mechanisms for protecting whistleblowers undergo analysis and enhancement with the use of data collected by the authorized unit during its work • Feedback and metrics are employed to improve the system • At least once a year, the organization communicates with its employees, major contractors, and suppliers regarding corruption reporting channels, as well as measures implemented to safeguard whistleblowers • The company disseminates information on the available anti-corruption channels to its employees and partners through brochures, posters, banners, and other promotional and souvenir items	• A separate performance audit of the Officer's activities, which includes auditing the integrity system, high-risk functions and major contractors, is to be undertaken at a minimum interval of every three years • Analytical tools and techniques, such as correlation and regression analysis, are used to evaluate the collected data to identify trends and potential corruption risks

Sections / Levels	Culture				System			Accountability		
	Role of the manager (Tone at the Top) - leadership	Values: integrity and corporate culture	Development: education in the organization	Openness	The role of the Integrity Commissioner (prevention and detection of corruption)	Integrity strategy: policy and procedure standards	Managing corruption risks	Analysis of draft acts and candidates for positions and contractors (Due Diligence)	Law enforcement: message channels and working with whistleblowers	Supervision: performance audit of integrity system
V. Optimizing	• The top-manager actively promotes accomplishments in the field of integrity, specifically the prevention of corruption, to external partners and clients • The top-manager encourages the implementation of new initiatives, projects and procedures to further enforce integrity and prevent corruption • The manager has distinct Objectives (OKRs) or Key Results (OKRs) or Key Performance Indicators (KPIs) related to integrity and preventing corruption • If corruption or any other ethical violations are identified within the organization, appropriate actions will be taken based on established protocols • If an employee violates anti-corruption policies, the manager must personally inform all organization employees about the inappropriateness of such actions. If there are no reputational or other risks, the manager should communicate this information publicly • Furthermore, the manager is expected to actively participate in all investigations related to corruption offenses	• The elements of the corporate culture are consistently embedded within the organization in alignment with both the organization's gathered data and the optimal global and local practices • The organization proactively advances its ethical criteria by enacting Corporate Social Responsibility initiatives • The organization hosts employee events, which delve into ethical dilemmas, the vision, mission and efforts, both overall and specific to various sectors. • The most crucial criterion in employee selection procedures is integrity • Each employee in the organization should consider integrity as key value when making decisions during their work	• Training programs are enhanced and tailored to the staff's requirements, taking into account information on previous training sessions and their impact • Programs are revised as per alterations in the legislation, recommendations of the authorized body and optimal practices in this field • The organization launches a customized integrity-building training, for instance, special courses for the management, procurement team and legal personnel • The organization regularly reviews and enhances the process of providing guidance to its employees based on collected data. Standard responses to frequently asked employee inquiries are also prepared, and training programs are tailored to suit the consultation results	• The organization regularly updates relevant pages with information regarding the activities of the authorized unit • Interactive data modules are being implemented, allowing everyone to view the development of integrity (preventing corruption) within the organization and the outcomes of the authorized unit's work	• The position of an Officer, in terms of status and remuneration, is that of a high-level manager • The activities of the authorized unit are regularly scrutinized and enhanced using data • All large, separate units (subsidiaries) of the organization, along with organizations under its subordination, have employees of the authorized unit appointed to distinct positions, who are managed by the Officer and are accountable to it • Regular training is provided to employees of the authorized unit, considering the organization's requirements. Identified risks of corruption that demand particular expertise for their effective resolution are taken into account • The Officer has a budget specifically allocated by the organization for implementing measures aimed at promoting integrity and preventing corruption. This includes purchasing relevant services and software, developing training courses, maintaining channels for reporting corruption, and conducting independent anti-corruption investigations	• The organization regularly reviews policies and procedures based on data collected by the authorized unit, based on the latest changes in legislation and the best local and international practices • The reasons for violations or inefficiencies of existing policies and procedures are investigated, resulting in optimization of existing policies in accordance with the identified problems	• IT products that help automate the process of assessing corruption risks and fully file it are being used; use the latest technologies for analyzing corruption risks • Policies and procedures for assessing corruption risks are regularly reviewed in accordance with the results of events, audit reports and employee feedback, taking into account the best local and international practices • A risk-oriented culture is being formed, which provides for forecasting potential risks before they occur in the organization's activities • Full transparency of all corruption risk assessment procedures and their minimization for all interested parties is ensured • An external corruption risk assessment is carried out at least once every three years	• Procedures for analyzing acts, verifying the integrity of candidates for positions and counterparties are periodically updated in accordance with data collected by the authorized unit and best practices	• Corruption reporting channels are constantly updated and optimized using the best local practices. • recommendations of the authorized body and advanced technologies • Senior management and the organization communicate with employees and core contractors/suppliers with regard to corruption reporting channels and measures to protect whistleblowers at least once a year • The organization distributes information about existing channels of corruption reporting through brochures, posters, banners, advertising and souvenir products • The supervisory board or, in case of its absence, the head of the organization receives regular accounts on corruption reports received and measures taken	• In addition to the internal audit, an external audit of the effectiveness of the Officer's activities and the integrity system in the organization is also conducted at least once every three years • All results of conducted audits, as well as information on responding to identified risks, are covered publicly (on the website and public pages of the organization) • The organization is constantly looking for ways to improve audit processes and regulatory policies. This may include making changes to quantitative indicators, updating the audit methodology, using new analytical tools and techniques and actively utilizing IT products

RECOMMENDED REQUIREMENTS FOR THE INTEGRITY OFFICER (FOR PREVENTING AND DETECTING CORRUPTION)

The requirements for a candidate for the position of the Officer include three components:
1. Alignment of the candidate's values with the organization's values;
2. Evaluation of the candidate's necessary personal competencies;
3. Possession of professional/specialized knowledge.

Alignment of the candidate's values with the organization's values

Values are the guiding principles that shape an organization and its team's actions, serving as a critical component of its culture. Conflicts in values can cause demoralization both for the employee and the organization.

When an employee's values align with the organization's values, they are motivated to work more effectively. Conflicts in values can cause demoralization both for the employee and the organization. It is recommended to have team members who share common values.

How do I find out the candidate's values?
1. Inquire about the candidate's important values (in order of priority).
2. Request examples of situations in which the candidate had demonstrated these values.
3. Ask the candidate to identify 3 criteria they use to choose a job.

Evaluation of the candidate's necessary personal competencies

For heads of public institutions, Officers[19], personnel development specialists and those employees who seek to systematize, improve and control work processes in order to build integrity and prevent corruption risks. This model will also be useful for managers of private companies and their compliance officers.

List of competencies and their behavioral indicators

Competence	Behavioral indicators
Integrity	• streamlines their own actions to protect public interests
	• refrains from conflict between private and public interests
	• effectively manages state resources
	• adheres to the rules of ethical behavior and decency
	• is aware of limitations in identifying preferences, attachments, and/or negative attitudes towards individual individuals and legal entities, political parties, public, religious and other organizations
	• behaves honestly, even when no one is watching

Innovative thinking	·	offers a non-standard solution to problem situations
	·	knows how to implement new/alternative approaches in work
	·	able to interest others with their ideas
	·	is interested in trends/best practices in the development of their own professional sphere
	·	can conduct a «brainstorming session»
	·	uses innovative experience of others
Critical/analytical thinking	·	can think independently
	·	has a desire to learn something new
	·	can search and analyze information
	·	knows how to find their own solution to the problem and formulate a convincing argument for the solution
	·	is able to discuss and defend the opinion in a discussion,
	·	is able to predict the development of the situation
	·	is able to structure and evaluate information
	·	has fact-checking skills
Communication	·	is able to identify stakeholders and build partnerships
	·	shares information and seeks to develop mutual understanding between different groups both within and outside the organization
	·	anticipates problems and adapts communication in response
	·	knows how to negotiate
	·	presents their own ideas, plans or programs based on facts, data, figures and specific examples verbally or in the form of a graphic presentation
Teamwork	·	understands the role and contribution to the common mission
	·	coordinates its actions with those of other participants
	·	consults with other project participants while working on joint tasks
	·	reaches agreement and support
	·	helps others if necessary
	·	can listen to others
	·	admits his/her mistakes and accepts someone else's point of view
	·	provides feedback
	·	is empathic
Project management	·	knows the basics of project management
	·	coordinates the project through high-quality planning, implementation and change control
	·	is able to control the quality of the project in accordance with the specified requirements
	·	is able to form an effective project team
	·	can identify, classify risks and then manage them (prevent or resolve them))

Possession of professional/special knowledge

List of professional/special knowledge

Knowledge of anti-corruption legislation and international standards in the field of corruption prevention and detection, in particular:

· United Nations Convention Against Corruption of 31.10.2003 (ratified in accordance with the Law of Ukraine No. 251-V dd 18.10.2006 «On Ratification of the United Nations Convention Against Corruption»).
· Law of Ukraine No. 1700-VIII dd 14.10.2014 «On Prevention of Corruption».
· Model regulation on the authorized unit (Commissioner) for the prevention and detection of corruption, approved by Order No. 277/21 of the National Agency for the Prevention of Corruption dd 27.05.2021.
· Methodology for managing corruption risks approved by Order No. 830/21 of the National Agency for the Prevention of Corruption dd 28.12.2021.
· Standard anti-corruption program of a legal entity approved by Order No. 794/21 of the National Agency for the Prevention of Corruption dd 10.12.2021.
· Mandatory requirements for the minimum staff of the authorized unit for the prevention and detection of corruption in state bodies, approved by Order No. 240/21 of the National Agency for the Prevention of Corruption dd 26.04.2021.
· International standards in the field of corruption prevention: ISO 37001: 2016 Anti-Corruption management systems; ISO 31000: 2018 Risk Management

NACP RESOURCES, NATIONAL AND INTERNATIONAL INTEGRITY STANDARDS

1. United Nations Convention Against Corruption (Law of Ukraine No. 251-V dd 18.10.2006 «On Ratification of the United Nations Convention Against Corruption»)
2. NACP website
3. Information system for monitoring the implementation of the state anti-corruption policy
4. Anti-corruption portal (integrity portal)
5. Unified portal of whistleblower reports
6. NACP training platform
7. NACP knowledge base
8. Unified state register of persons who have committed corruption or corruption-related offenses (Register of corrupt officials)
9. NACP. Integrity: concept, components, and history
10. Law of Ukraine No. 1700-VIII dd 14.10.2014 «On Prevention of Corruption»
11. On the Fundamentals of the State Anti-Corruption Policy for 2021-2025 (Law of Ukraine No. 2322-IX dd 20.06.2022)
12. State Anti-Corruption Program for 2023-2025 (Resolution of the Cabinet of Ministers of Ukraine No. 220 dd 04.03.2023)
13. Standard anti-corruption program of a legal entity (NACP Order No. 794/21 dd 10.12.2021)
14. Model regulation on the authorized unit (authorized person) for the prevention and detection of corruption (NACP Order No. 277/21 dd 27.05.2021)
15. Methodology for managing corruption risks (NACP Order No. 830/21 dd 28.12.2021)
16. Analytical study «The role of a leader in combating corruption: analytical review of the implementation of the «Tone at the Top» concept», 2022
17. Procedure for conducting a special audit of persons applying for positions that involve holding a responsible or particularly responsible position, and positions with an increased risk of corruption (Resolution of the Cabinet of Ministers of Ukraine No. 171 dd 25.03.2015)
18. Procedure for granting consent by the National Agency on Corruption Prevention to dismiss a person responsible for the implementation of the Anti-Corruption Program (NACP Order No. 408/20 dd 15.09.2020)
19. Procedure for granting consent by the National Agency on Corruption Prevention to dismiss the head of the authorized unit (authorized person) for the prevention and detection of corruption of a state body whose jurisdiction extends to the entire territory of Ukraine (NACP Order No. 268/21 dd 21.05.2021)

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10. https://zakon.rada.gov.ua/laws/show/1700-18#Text
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17. https://zakon.rada.gov.ua/laws/show/171-2015-%D0%BF#Text
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19. https://zakon.rada.gov.ua/laws/show/z0828-21#Text

20. Mandatory requirements for the minimum staff of the authorized unit for the prevention and detection of corruption in state bodies (NACP Order No. 240/21 dd 26.04.2021)
21. Regulations on the Unified State Register of persons who have committed corruption or corruption-related offenses (NACP Decision No. 166 dd 09.02.2018)
22. Procedure for conducting an anti-corruption expert examination by the National Agency on Corruption Prevention (NACP Order No. 325/20 dd 29.07.2020)
23. Procedure for conducting inspections of an organization of work on preventing and detecting corruption (NACP Order No. 152/23 dd 25.07.2023)
24. Procedure for making instructions by the National Agency on Corruption Prevention (NACP Order No. 8/21 dd 15.01.2021)
25. Procedure for maintaining a single portal of whistleblower messages (NACP Order No. 1/23 dd 03.01.2023)

OECD developments:
26. OECD recommendation on Public Integrity and the OECD Guide to Public Integrity
27. Pilot report on the results of the 5th round of OECD monitoring under the Istanbul Action Plan, 2022
28. Country Program Ukraine-OECD
29. Report «Anti-Corruption Reforms in Ukraine: prevention and fight against corruption in state-owned enterprises». 4th round of monitoring of the OECD's Istanbul Anti-Corruption Action Plan. Fighting corruption in Eastern Europe and Central Asia
30. OECD, UNODC, World Bank «Anti-Corruption Ethics and Compliance Handbook for Business»
31. OECD guidelines for Corporate Anti-corruption compliance (Drivers, Mechanisms and Ideas for Change)
32. OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (updated in 2023)
33. OECD Guidelines for Multinational Enterprises: These are recommendations for responsible business conduct in areas such as disclosure, human rights, environment, employment, and combating bribery
34. OECD Principles of Corporate Governance: These principles provide a framework for good corporate governance, which can help prevent corruption and promote transparent, accountable management in both the public and private sectors
35. OECD review of corporate governance of state-owned enterprises of Ukraine, 2021

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21. https://zakon.rada.gov.ua/laws/show/z0345-18#Text
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23. https://zakon.rada.gov.ua/laws/show/z1296-23#Text
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25. https://zakon.rada.gov.ua/laws/show/z0022-23#Text
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32. https://bitly.ws/Vd9K
33. https://bitly.ws/Vdaf
34. http://mneguidelines.oecd.org/annualreportsontheguidelines.html
35. https://www.oecd.org/corporate/principles-corporate-governance

ISO standards:

36. ISO 37001:2016 Anti-bribery management systems
37. Collection «Management system for anti-corruption measures. Requirements with recommendations for use» according to ISO 37001:2016
38. ISO 31000:2018 - Risk Management
39. ISO 19600:2014 - Compliance Management Systems
40. ISO 22301:2019 - Business Continuity Management Systems: This standard specifies requirements for a management system to protect against, reduce the likelihood of, and ensure an organization's recovery from disruptive incidents. While not specifically focused on anti-corruption, it does address organizational resilience, which can be affected by corruption and compliance issues

Other sources:

41. U Directive 2014/95/EU on Non-Financial Reporting: This directive requires certain large companies to disclose information on their environmental, social, and governance (ESG) performance, including anti-corruption and anti-bribery matters
42. Organization for security and co-operation in Europe anti-corruption guide, 2016
43. International Code of Conduct for public officials
44. UN guidelines on anti-corruption ethics and business compliance
45. Guide to applying the U.S. Anti-Corruption Act abroad
46. The IIA's three lines model
47. The relations between business integrity and commercial success, 2017
48. Responsibility. Active in anti-corruption
49. Empirical Study of Anti-Corruption Policies and Practices in Nordic Countries. Delna, Latvia, 2016
50. National Survey. Employers Universally Using Background Checks to Protect Employees, Customers and the Public
51. The Best Background Check Services & Companies For 2022
52. The EY Global Integrity Report 2022 reveals how a focus on governance can help reimagine corporate integrity, 2022
53. The Most Important Leadership Attribute? New Study Has Clear Answer
54. Research «2020 Global RepTrak. A Decade of Reputation Leaders»
55. Three types of loyalty. What motivates Ukrainians to work better? 2020
56. Company values: a way to inspire and motivate employees

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39. https://www.iso.org/standard/62342.html
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45. https://www.justice.gov/criminal-fraud/file/1292051/download
46. http://surl.li/efpxf
47. http://surl.li/efoqt
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51. http://surl.li/efpsh
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53. http://surl.li/efpwo
54. http://surl.li/efomz
55. http://surl.li/efopt
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PRACTICAL TOOLS, THE IMPLEMENTATION OF WHICH WILL MAKE YOU AND YOUR ORGANIZATIONS VIRTUOUS AND EFFECTIVE

**Manual
for the manager**
Building a virtuous and
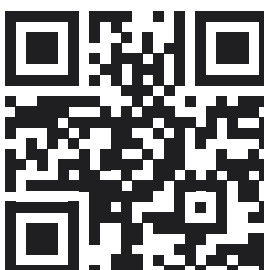effective organization

Order on the OKR
management system based
on the methodology of goals
and key results

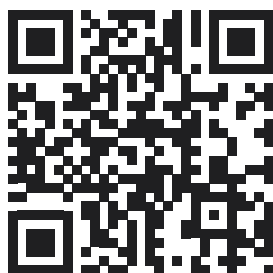

OECD
recommendations
on Public Integrity

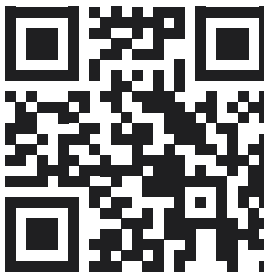State Anti-Corruption
Program
for 2023-2025

Base
of knowledge

Integrity portal

Whistleblower
portal

Learning platform
study.nazk.gov.ua

Order on Procedure for
preparation and approval of
draft NPAs (policy cycle)

Act now!