



Speak Up and Whistleblowing Policy

CORPORATE DOCUMENT

Crown Agents Ukraine LLC

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CHANGE LOG

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This Policy sets out the principles, channels, and protection guarantees for individuals who, in good faith, speak up about suspected wrongdoing, breaches of requirements, unethical conduct, or other incidents or risks connected with the activities of Crown Agents Ukraine.

1. Purpose of the Policy

The purpose of this Policy is to sustain a Speak Up Culture in which employees, partners, and other interested parties can raise concerns promptly and safely, knowing that their report will be reviewed in good faith and that they themselves will be protected from retaliation.

2. Basis for Adoption

This Policy has been developed in accordance with Chapter VIII “Protection of Whistleblowers” (Articles 53–53-9) of the Law of Ukraine “On Prevention of Corruption” of 14 October 2014 No. 1700-VII, and with regard to the Code of Ethics and Business Conduct, the Business Partner and Supplier Code of Conduct, and Crown Agents Ukraine's internal commitments to its donors and clients regarding transparency and accountability.

3. Scope of Application

This Policy applies to the employees, leadership, and directors of Crown Agents Ukraine, consultants, temporary personnel, business partners and suppliers, as well as any third parties who interact with the Company and hold information about possible violations.



4. Terms and Definitions

Report (disclosure) — the submission of a report concerning a suspicion of wrongdoing, unlawful acts, or omissions within the Company.

Speak Up Culture — an environment that supports open or confidential conversations and encourages dialogue, raising questions, concerns, and observations without fear of adverse consequences.

Whistleblower — a natural person who, believing the information to be true, in good faith reports possible facts of corruption or corruption-related offences, or other violations of the law or the Company's internal policies, within the meaning of Article 1 of the Law of Ukraine “On Prevention of Corruption”.

5. Core Principles

Protection from retaliation. No person who reports a violation in good faith may be subjected to persecution, discrimination, demotion, dismissal, or any other adverse consequences.

Confidentiality. The identity of the reporting person is not disclosed without their consent, except where expressly required by law.

Accessibility. Reporting channels are organised so that they can be used without hindrance by all individuals, regardless of their individual needs, abilities, or circumstances.

Good faith. Reports are submitted on the basis of reasonable suspicion, not with the intent to cause harm.

Zero tolerance for retaliation. Any form of harassment or persecution of a reporting person constitutes a breach of this Policy.

6. Subject Matter of Reports

A report (disclosure) may relate to any action or omission that is inconsistent with the law, internal policies, or the ethical standards of Crown Agents Ukraine. This includes, in particular:

- conflicts of interest (business, personal, or political);
- corruption and financial misconduct, including bribery, fraud, and money laundering;
- criminal offences or other violations of the law;
- occupational health and safety violations;
- safeguarding issues, including violence, bullying, or harm to vulnerable groups;
- discrimination on any grounds;
- sexual exploitation, abuse, or harassment (SEAH);
- environmental violations;
- other serious breaches of the Company's ethical standards or internal policies.

7. Reporting Channels

Crown Agents Ukraine provides accessible and safe channels for reporting concerns: to a direct line manager or another authorised representative of the Company, or via email at tenderbox@crownagents.com.ua.

8. Protection of Whistleblowers

Crown Agents Ukraine provides appropriate protection to individuals who, in good faith, report a suspicion or known facts of violations under this Policy, regardless of their position, employment status, or contractual relationship with the Company. This protection includes guarantees of confidentiality, a prohibition on retaliation, and the right to submit a report.



9. Anonymous Reports

Crown Agents Ukraine accepts and reviews anonymous reports. At the same time, the Company encourages open reporting, as this supports a more effective review. When assessing anonymous reports, the Company takes into account the seriousness of the matter, the credibility of the information provided, and the possibility of corroborating it from other sources.

10. Handling of Reports

All reports are reviewed promptly, impartially, and in a manner that upholds confidentiality. The Company handles reports on a need-to-know basis, but cannot guarantee complete anonymity or the mandatory disclosure of review outcomes to third parties where this cannot genuinely be assured.

11. Good Faith and Accountability

Crown Agents Ukraine encourages the reporting of any concerns, even where the individual does not have complete information or certainty about the situation. Where a report is made in good faith but is not substantiated, no adverse consequences apply to the reporting person. At the same time, knowingly false or malicious reports constitute a breach of this Policy.

12. Rights of Persons Reporting Violations

Individuals who report violations in good faith have the right to:

- confidentiality of their identity at every stage of the review;
- protection from any form of retaliation, harassment, or discrimination;
- acknowledgement of receipt of their report (for non-anonymous reports);
- being informed of the general outcome of the review, to the extent that this does not compromise the confidentiality of the investigation;
- recourse to external authorities where internal mechanisms have not provided an adequate response.

13. Relationship to Other Policies

This Policy applies alongside the Code of Ethics and Business Conduct, the Business Partner and Supplier Code of Conduct, and the Safeguarding, PSEAH, and Child Protection Policy. Where there is a conflict between the provisions of this Policy and those documents on a particular matter, the more stringent standard applies.

14. Amendments

Crown Agents Ukraine reserves the right to periodically update this Policy. The date of the last review is indicated in the change log of this document.

Effective date: 2026. Date of last review: 2026.