



Procurement Policy and Complaints Procedure

CORPORATE DOCUMENT

Crown Agents Ukraine LLC

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Crown Agents Ukraine procures goods, works and services to support responsible project delivery, protect client funds and create fair opportunities for qualified suppliers. This policy explains how procurement opportunities are managed, how suppliers can take part, and what clients and contracting authorities can expect from our controls.

1. Who This Policy Is For

This policy is intended for prospective and current suppliers, contractors, clients, project teams and other stakeholders involved in procurement. Suppliers and contractors can use it to understand how opportunities are announced, how to prepare bids, how evaluation is conducted, and what compliance requirements apply. Clients can use it to understand how Crown Agents Ukraine safeguards funds, manages competition, and oversees contract performance.

2. Our Procurement Principles

Our procurement activity is guided by principles that help bidders understand how they will be treated, and help clients understand how decisions are controlled:

- Best value for money: decisions take into account price, quality, fitness for purpose, delivery timelines, whole-life cost, service and support, logistics, compliance, and reputational factors.
- Transparency and fairness: bidders are treated equally, and procurement requirements, evaluation criteria, and submission instructions are clearly communicated.
- Efficient and proportionate use of funds: procurement methods are chosen in line with the value, urgency, complexity, and risk profile of each requirement.



3. The Procurement Process

Our procurement cycle is structured so that requirements are clear before bidders are engaged and proposals are evaluated objectively. The process typically follows five stages:

- 1. Identifying the need and planning the procurement:** confirming objectives, technical specifications, budget, timelines, risk level, procurement method, evaluation approach, and required approvals.
- 2. Tendering or quotation process:** inviting suppliers through the appropriate procurement method, providing submission instructions, eligibility requirements, technical requirements, commercial terms, timelines, and the clarification process.
- 3. Evaluation:** reviewing bids against the stated requirements and criteria, documenting results, managing clarifications as needed, and maintaining confidentiality and fairness.
- 4. Contract award:** obtaining required approvals or client no-objections, finalising contract documentation and the award process.
- 5. Contract management:** monitoring delivery, contractual obligations, documentation, and reporting through to completion.

4. Procurement Methods

Depending on the requirement, estimated value, urgency, complexity and market conditions, Crown Agents Ukraine may use single-source procurement, price quotations, restricted tendering, or open tendering. Competitive methods are used where appropriate to encourage market participation, ensure fair comparison of bids, and deliver the best value for money. The method chosen must be proportionate to the procurement need and justified in the procurement file.

Open tendering is typically used where broad market participation is appropriate. Restricted tendering may be used where a controlled list of suppliers, a specialised market, or a pre-qualification process is needed. Price quotations may be used for readily available goods or standard requirements. Single-source procurement may only be considered where justified, for example: urgent needs, proprietary requirements, compatibility with existing supplies, continuity of services, or other circumstances where competition is not possible.

5. Bidder Participation and Tender Management

We aim to give prospective suppliers timely and relevant information about procurement opportunities, submission requirements, evaluation criteria, and timelines. Bidders are expected to follow the instructions in each tender document, submit complete and duly authorised bids by the stated deadlines, and ensure that bids directly address the technical, commercial, and compliance requirements. Late, incomplete, or non-compliant bids may be rejected in accordance with the tender terms.

Where required, procurement notices may be published to inform the market of upcoming opportunities and clarify how interested suppliers can take part. Bidders should review each notice or tender document carefully, confirm they meet the stated eligibility and technical requirements, submit all requested documents in the specified format, and raise clarification questions within the stated timeframe (if any).

A complete bid should typically demonstrate compliance with the specification, delivery capacity, pricing, bid validity period, warranties or service support, logistics arrangements, required declarations, and any evidence requested in the tender documents. Suppliers are responsible for ensuring all submitted information is accurate, current, and authorised by an appropriate representative.



6. Evaluation and Due Diligence

Evaluation is conducted objectively against the requirements and criteria set out in the procurement documents. The evaluation process is confidential and documented, and may include checks on technical compliance, commercial acceptability, delivery capacity, price reasonableness, required declarations, and responses to clarifications. The aim is to identify the bid that best meets the stated requirements and delivers the best value for money.

Before entering into a contract, Crown Agents Ukraine conducts proportionate due diligence on suppliers and other business partners, subject to applicable exemptions. This may include checks relating to legal status, sanctions, conflicts of interest, financial or operational capacity, ethical conduct, compliance requirements, and prior performance, where relevant. Due diligence helps ensure procurement decisions are accountable and consistent with client requirements.

Clients can expect procurement decisions to be supported by documented requirements, appropriate market engagement, objective evaluation records, and evidence of contract management. Where specific client procedures apply, Crown Agents Ukraine aligns procurement actions with those requirements.

7. Conflicts of Interest

Any actual, potential, or perceived conflicts of interest must be disclosed without delay. Where a conflict is identified, appropriate measures are taken to protect the integrity of the procurement process and ensure impartial decision-making.

8. Contract Award and Management

Contracts are awarded once evaluation is complete and any required approvals or client no-objections have been obtained. Signed contracts and supporting documentation are retained in the relevant project records to ensure auditability, reporting, and accountability. During contract performance, Crown Agents Ukraine monitors delivery, contractual performance, financial documentation, issue resolution, and reporting, so that clients can see how procurement objectives are being met and how supply risks are managed.

9. Complaints Procedure

Crown Agents Ukraine is committed to ensuring that every procurement participant has a clear and accessible way to raise concerns about the conduct of a specific procurement procedure.

Who may submit a complaint. A complaint may be submitted by any actual or prospective participant in a tender or quotation procedure who believes that an action or decision within that procurement procedure breaches the terms of the tender documentation, the procedural requirements of this policy, or applicable donor rules.

What may be complained about. A complaint may relate to actions or decisions within a specific procurement procedure — including the content of the tender documentation, clarifications, the evaluation of the complainant's bid, or the contract award decision. This procedure is not intended for allegations of fraud, corruption, collusion, or other integrity breaches — such reports are handled through the Speak-Up mechanism (see below).

Timeframe for submission. A complaint regarding the tender documentation or participation conditions must be submitted before the bid submission deadline. A complaint regarding evaluation or contract award must be submitted within the timeframe stated in the relevant tender document or results notification, or, where no such timeframe is stated, within a reasonable time after the complainant became aware, or should have become aware, of the grounds for the complaint.

Submission channel. Complaints are submitted in writing to info@crownagents.com.ua, quoting the tender reference to which the complaint relates.



Mandatory information in the complaint. A complaint must include: the complainant's contact details; the reference number and title of the relevant tender; a clear description of the action or decision being complained about; the grounds for the complaint; and, where available, supporting documents.

Acknowledgement of receipt. Crown Agents Ukraine acknowledges receipt of a complaint within a reasonable timeframe of its receipt.

Initial eligibility check. A complaint is first checked for eligibility — whether it was submitted by an authorised person, within the applicable timeframe, and whether it relates to the subject matter of this procedure. Ineligible complaints are returned to the complainant with an explanation of the reason.

Independence of review and management of conflicts of interest. A complaint is reviewed by a person or persons who were not directly involved in the decision being complained about. Where a conflict of interest in the review is identified, measures are taken to address it, including replacing the person responsible for the review.

Additional materials. The person reviewing the complaint may request additional documents or explanations from both the complainant and relevant internal departments.

Decision. Following the review, a reasoned decision is issued and communicated to the complainant in writing, to the extent permitted by the confidentiality of the procurement process and the rules of the relevant client.

Review or escalation. If the complainant disagrees with the outcome of the review, they may request a review of the decision in accordance with the procedure stated in the response, or, where applicable, in accordance with the escalation procedure set out in client rules.

Record-keeping. Records of the complaint and its review are retained together with other procurement documentation for the periods established by this policy, the client, or applicable law.

Relationship to client rules. Where a specific procurement is funded by a client with its own complaints-handling procedure, that client's procedure applies, and this Complaints Procedure applies on a subsidiary basis to the extent it does not conflict with the client's requirements.

Important limitations. Submitting a complaint does not, in itself, suspend the procurement procedure, automatically extend the bid submission deadline, cancel a contract award decision, grant the complainant access to other bidders' proposals, or automatically result in re-evaluation. These consequences depend on the rules of the specific procurement, donor requirements, and contract terms, and are decided on a case-by-case basis.

Where a complaint or information obtained through it indicates fraud, corruption, collusion among bidders, or another breach of integrity, that information may be referred through the Speak-Up mechanism. Handling a procurement complaint and handling a Speak-Up report remain separate procedures with different objectives, timelines, and responsible persons.

10. Commitment to Responsible Procurement

Crown Agents Ukraine is committed to procurement practices that are professional, ethical, transparent, and proportionate. For bidders, this means fair access to relevant opportunities, clear instructions, and objective evaluation. For clients, this means structured controls, documented decisions, responsible supplier engagement, and reliable delivery for projects and beneficiaries.