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CODE OF ETHICS

LUKRAINE asbl

Prepared by:	O.Klopota	
Reviewed by:	Committee, signed by N.Zharov	
Approved by:	General Assembly	

I. Integrity

All Committee members, coordinators, effective association members, employees, and volunteers of LUKRAINE shall maintain the highest standard of ethical conduct and act with honesty, integrity, and openness in all of their dealings as representatives of LUKRAINE. LUKRAINE shall maintain a working environment that values integrity, fairness, and respect.

Committee members have the added responsibility to serve with respect, concern, courtesy, and responsiveness and to set a good example for their teams, for actions of which they are being responsible.

II. Mission and Vision


Our mission is to work towards Ukraine's recognition as a fair partner amongst European nations, to shed visibility on its true power to contribute on a global level and create opportunities for a better future for those currently in need.

LUKRAINE aims

- to develop, support and lead humanitarian aid programs of all kinds for Ukrainian nationals residing in Ukraine or Luxembourg and in particular Ukrainian refugees residing in Luxembourg and temporarily displaced persons in Ukraine;
- to collect funds for the development and reconstruction projects in Ukraine and to ensure their deployment;
- to lead, support, promote and encourage integration of Ukrainians in the community of Luxembourg and the European Union;
- to promote Ukrainian language, literature, art, music, traditions and support shared social, cultural and educational projects between Ukrainian, Luxembourgish and EU communities.

III. Governance

The Committee members are responsible for setting the mission and the strategic direction of LUKRAINE and for exercising oversight of its activities, projects, finances and policies. The Committee shall:

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- Ensure that Committee members possess the requisite skills and experience to carry out their duties and that all coordinators and effective association members understand and fulfill their governance duties, acting for the benefit of LUKRAINE and its public purpose;
- Ensure that conflicts of interest, as well as the appearance of conflicts of interest, are avoided or properly managed;
- Be responsible for the hiring and regular performance review of the employees, and ensure that the compensation of the employees is reasonable and appropriate;
- Ensure that employees provide the Committee with timely and comprehensive information so that the Committee can effectively carry out its duties;
- Ensure that LUKRAINE conducts all transactions and dealings with integrity and honesty;
- Ensure that LUKRAINE promotes working relationships with Committee members, coordinators, association members, employees, and volunteers based on mutual respect, fairness, and openness;
- Ensure that LUKRAINE is fair and inclusive in its hiring and promotion policies and practices for all Committee members, coordinators, effective association members, employees, and volunteers;
- Ensure that key policies of LUKRAINE are in writing, clearly articulated, and adopted;
- Ensure that the resources of LUKRAINE are responsibly and prudently managed;
- Ensure that LUKRAINE has the capacity to carry out its activities and projects effectively.

IV. Books and Records


LUKRAINE shall keep accurate, auditable record of all transactions maintained in accordance with generally accepted accounting principles. Improper, intentionally incomplete, or fraudulent documentation or reporting is contrary to LUKRAINE’s policy. No entries may be made to intentionally hide or disguise the true nature of any transaction or to create funds to be used for other purposes.

Information that is recorded and submitted to other parties—whether inside or outside LUKRAINE — must be accurate, timely, and complete. Reports cannot be used to mislead or conceal anything from their intended audience. This accuracy requirement applies to both financial and nonfinancial records. All records must be maintained according to records management policy.

All Committee members, coordinators, effective association members, employees, and volunteers must use common sense and observe standards of good taste regarding content and language when creating records and other documents (such as e-mail) that may be retained by LUKRAINE or a third party, keeping in mind that at a future date, this record may become public.

V. Law and Ethics

LUKRAINE shall comply with all applicable local laws and regulations and shall seek the advice of counsel when necessary or appropriate. Compliance with the law, however, is the minimum standard of expected behavior. LUKRAINE shall also adhere to the highest ethical standards. All resolutions and other legal actions by the Committee shall satisfy two requirements: (1) they shall be legally permissible,

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and (2) they shall also reflect the highest ethical standards as determined by the Committee in the exercise of its sole discretion.

VI. Funds

In managing its funds responsibly and prudently, LUKRAINE shall:

- Devote a reasonable percentage of its annual budget to programs in pursuance of its mission;
- Incur administrative costs adequate to ensure effective accounting and legal compliance systems, internal controls, competent staff, and other expenditures critical to professional management;
- Pay compensation, in return for services, that is reasonable but not excessive;
- Avoid accumulating LUKRAINE funds excessively;
- Follow spending practices and policies that are fair, reasonable, and appropriate to fulfill the mission of LUKRAINE;

Committee members, coordinators, effective association members, employees, and volunteers must use LUKRAINE’s funds for mission-related purposes and in the best interest of LUKRAINE, demonstrating careful, cost-conscious, and effective use of all Organization funds. When using expense accounts of LUKRAINE, all expenses must be fully and clearly document in accordance with the Expense policy.


VII. Diversity and Equal Opportunity

LUKRAINE shall promote diversity and inclusiveness amongst Committee members, coordinators, effective association members, employees, and volunteers. LUKRAINE is committed to treating each person fairly and equitably, prohibiting any kind of discrimination, harassment, or intimidation, whether committed by or against a Committee member, coordinator, effective association member, employee, volunteer donor, vendor, or visitor. Discrimination and harassment, whether based on a person’s race, gender, color, religion, national origin, age, disability, marital status, personal appearance, sexual orientation, family responsibility, or political affiliation are inconsistent with LUKRAINE’s vision.

VIII. Evaluation

LUKRAINE is committed to improve, continually, its public programs and its organizational quality. LUKRAINE shall periodically review its program and incorporate lessons learned into future programs. LUKRAINE shall be responsive to new developments in its field of activity and shall be responsive to the interests of its audiences and other constituencies. LUKRAINE shall develop and implement an evaluation procedure whereby the performance of the Committee members and coordinators is evaluated periodically.

IX. Fundraising

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LUKRAINE shall respect the privacy concerns of individual donors and shall follow donor intent in making expenditures. LUKRAINE shall disclose important and relevant information to potential donors. In raising funds from the public, LUKRAINE shall:

- Inform donors of the mission of LUKRAINE, how resources will be used, and the integrity of LUKRAINE causing donations to be used effectively for their intended purposes;
- Inform donors of the identity of those serving on LUKRAINE’s Committee;
- Disclose LUKRAINE’s most recent financial reports;
- Represent that contributions will be used for the purposes for which they were given;
- Provide appropriate acknowledgement and recognition of contributions;
- Treat information about donations with respect and with confidentiality to the extent provided by the law;
- Encourage donors to ask questions when making a donation, and provide prompt, truthful, and forthright answers.

X. Transparency

LUKRAINE shall provide comprehensive and timely information to the public, the media, and all stakeholders and shall be responsive in a timely manner to reasonable requests for information. All information about LUKRAINE shall fully and honestly reflect the policies and practices of LUKRAINE. All solicitation materials shall accurately represent LUKRAINE’s policies and practices. All financial and program reports shall be complete and accurate in all material aspects. The following governance documents shall be posted on LUKRAINE’s website:

- Annual Financial report
- Bi-monthly “Your Imprint” report


XI. Conflicts of Interest

Committee members, coordinators, employees may not participate in any transaction involving LUKRAINE, including the awarding of any grant, if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when Committee member, coordinator, effective association member, employee, or a family member has a financial interest in the transaction.

XII. Bribery

LUKRAINE strictly prohibits any kind of bribery, including offering, promising, giving, accepting or seeking a bribe. It is inconsistent with LUKRAINE’s policy

- to give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- to accept any offer from a third party that is made or could be made with the expectation of a business advantage;

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- to give or offer any payment to a government official in any country to facilitate or speed up a routine or necessary procedure;
- to threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

XIII. Political Activity

LUKRAINE does not align itself with political parties and it is prohibited to use any assets to endorse political candidates, mobilize supporters to elect or defeat candidates.

XIV. Confidentiality

All Committee members, coordinators, association members, employees, and volunteers have a duty to safeguard information that is proprietary to LUKRAINE. Information about LUKRAINE that is confidential or proprietary and obtained by a Committee member, coordinator, effective association member, employee or volunteer as a consequence of such person's association with LUKRAINE may not be disclosed to third parties unless expressly authorized by LUKRAINE.

XV. Complaints


Any person, whether or not connected with LUKRAINE, may lodge a complaint of unethical conduct against a Committee member, coordinator, effective association member, employee or volunteer of LUKRAINE by filing such complaint, written or oral at complaints@ukrainians.lu.

XVI. Remedies

Any Committee member, who fails to comply with this Code of Ethics may, in the discretion of the Committee, may be removed from the Committee. If any coordinator, effective association member, employee or volunteer fails to comply with this Code of Ethics, that person may be put on notice or terminated, in the discretion of the Committee.


XVII. Annual Affirmation Statement

LUKRAINE shall provide a copy of this Code of Ethics to every Committee member, coordinator, effective association member, employee and volunteer. Each year the Annual Affirmation Statement, attached, shall be signed by each Committee member, coordinator, effective association member and employee, affirming that such person has received a copy of this Code of Ethics, has read and understands it, and agrees to comply with it. Volunteers are not required to sign and submit such a Statement. All Annual Affirmation Statements shall be submitted to the General Secretary during the first General Assembly of the year.

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Change History

Version	Change Detail	Reason for Change	Document Owner
1.0	New Policy	Not applicable	President
2.0	XV. Complaints	Email change	President

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ANNUAL AFFIRMATION STATEMENT

LUKRAINE

The Code of Ethics of LUKRAINE requires an annual affirmation that you have received, read, understand, and agree to comply with the Code of Ethics.

Please sign this Annual Affirmation Statement indicating your affirmation as described above.

Please return this Statement to the General Secretary of LUKRAINE each year no later than 15 calendar days after the first General Assembly of the year.

Your name: _____

Date: _____