Agency for Recovery

APPROVED
Order of the State Agency for Restoration and Infrastructure Development of Ukraine

_____No._____

ANTI-CORRUPTION PROGRAM

OF THE STATE AGENCY FOR RESTORATION AND INFRASTRUCTURE DEVELOPMENT OF UKRAINE FOR 2026–2028

PREAMBLE

The State Agency for Restoration and Infrastructure Development of Ukraine (the Agency for Restoration), recognizing its responsibility to the state and society, through this Anti-Corruption Program (hereinafter referred to as the "Program"), reaffirms its commitment to the principles of the rule of law, integrity, transparency, accountability, good governance, and the effective use of public resources, and sets forth the fundamental principles for the formulation and implementation of its anti-corruption policy for 2026–2028.

Large-scale tasks related to the reconstruction and development of infrastructure, the management of significant amounts of budgetary funds and international aid resources, as well as ongoing interaction with a wide range of stakeholders, give rise to high corruption risks in the activities of the Agency for Restoration and the enterprises, institutions, and organizations under its jurisdiction. At the same time, even the mere suggestion of possible corruption can undermine trust in state institutions and, consequently, in the country's restoration process.

Therefore, the Agency for Restoration considers strengthening a culture of integrity and the responsible management of corruption risks to be one of its management priorities and a prerequisite for sustainable recovery, and declares its complete rejection of and zero tolerance for corruption in any form.

I. PRINCIPLES OF THE GENERAL AGENCY-WIDE ANTI-CORRUPTION POLICY (INTEGRITY POLICY)

1. Purpose of the Program

1. The purpose of adopting this Program is to create an institutional environment in which integrity is an integral part of management decision-making, and in which corruption risk management, transparency, and accountability are integrated into the core processes of the Agency for Restoration and the enterprises, institutions, and organizations under its jurisdiction, thereby helping to strengthen trust in their activities.

2. Content of the Program

1. The Program defines:

- the fundamental principles of the Agency for Restoration's anti-corruption and integrity policies, as well as measures for their implementation;
- identified corruption risks and measures to address them;
- the procedures for training and disseminating information on corruption prevention;
- mechanisms for monitoring, evaluating the implementation of, and revising the Program.

3. Regulatory Framework for the Agency's Anti-Corruption Policy

The Agency's anti-corruption policy is implemented in accordance with the Law of Ukraine "On the Prevention of Corruption" (hereinafter referred to as the "Law"), the Law of Ukraine "On the Civil Service," this Program, the Code of Ethics and Conduct for Employees of the Agency for Restoration, other

legislative acts, and internal organizational and administrative documents of the Agency for Restoration governing the prevention and combating of corruption, in particular regarding the activities of the Sector for the Prevention and Detection of Corruption (hereinafter referred to as the "Sector"), the management of corruption risks, the prevention and resolution of conflicts of interest, compliance with financial control requirements, the operation of mechanisms for reporting possible instances of corruption or corruption-related offenses, the protection and encouragement of whistleblowers, the conduct of internal investigations, as well as other issues related to the implementation of anti-corruption policies. A complete list of the Agency for Restoration's internal organizational and administrative documents governing the prevention and combating of corruption is provided in Appendix 4 to this Program.

The Agency for Restoration also takes into account the recommendations of the National Agency on Corruption Prevention (hereinafter "NACP") and international best practices in the field of integrity and corruption prevention.

2. Internal organizational and administrative documents on the prevention and combating of corruption are reviewed and, if necessary, updated to reflect changes in legislation, the results of corruption risk assessments, the results of monitoring and evaluating the implementation of this Program, as well as changes in the functions, powers, and operating environment of the Agency for Restoration.

4. Principles

1. The principles underlying the Agency for Restoration's anti-corruption policy:

- the rule of law and legality;
- leadership;
- integrity, impartiality, and zero tolerance for corruption in any form;
- openness, transparency, and accountability;
- integration of corruption risk management into the functions and processes of the Agency for Restoration, as well as the enterprises, institutions, and organizations under its jurisdiction;
- focusing efforts on prevention as the most effective way to combat corruption;
- the inevitability of accountability for corruption and corruption-related offenses;
- inclusivity in the development and implementation of anti-corruption policy;
- continuous improvement of the system for preventing and combating corruption.

5. Conclusions Based on the Results of the Assessment of the Implementation of the 2023–2025 Anti-Corruption Program

1. The Anti-Corruption Program of the Agency for Restoration for 2023–2025 was developed concurrently with the institutional establishment of the Agency for Restoration, which was formed in 2023 through the reorganization of the State Agency of Automobile Roads of Ukraine and the State Agency for Infrastructure Projects of Ukraine. The assignment of new functions to the Agency for Restoration for the implementation of state policy in the field of restoration

necessitated the establishment of a corruption prevention system from the outset. The program had a dual purpose: to ensure the management of critical corruption risks in the activities of the Agency for Restoration and the legal entities under its jurisdiction, and at the same time to establish an internal regulatory framework for the prevention, detection, and counteraction of corruption.

2. The vast majority of the measures envisaged by the Program have been implemented: the implementation rate for measures to minimize corruption risks stands at 85%.

An internal regulatory framework on integrity and corruption prevention has been established, specifically addressing ethical conduct, compliance, the prevention and resolution of conflicts of interest, anti-corruption vetting of business partners, the implementation of anti-corruption financial controls, the handling of corruption reports, and the conduct of internal investigations, fostering a culture of whistleblowing, conducting audits of how legal entities under the Agency for Restoration's jurisdiction manage corruption prevention and detection, and adopting a series of policy and procedural documents in the area of public procurement. Measures to raise anti-corruption awareness among civil servants at the Agency for Restoration have been implemented.

Coordination and cooperation with regional infrastructure restoration and development services (hereinafter referred to as "Restoration Services") on issues related to minimizing corruption risks were ensured: under the coordination of the Agency for Restoration, a model anti-corruption program for the Restoration Services and standardized risk mitigation measures were implemented, model procedures for organizing public procurement, approved by all Restoration Services; unified approaches to anti-corruption vetting of business partners; periodic reporting on anti-corruption issues; and an annual review of corruption risk registries.

Digital tools for transparency and accountability have been implemented and are in use, including the DREAM digital ecosystem for managing restoration projects, a system for assessing risks and monitoring procurement outcomes, and a dashboard for analytical price monitoring; integration with the Unified Whistleblower Reporting Portal has been completed.

3. At the same time, not all measures to minimize corruption risks have been fully implemented: some measures are long-term in nature, while others have become obsolete or require revision due to changes in the operating environment of the Agency for Restoration, as well as changes in regulatory frameworks. Based on the results of the new cycle of corruption risk assessment, some corruption risks have been included in this Program, taking into account changes in the Agency for Restoration's operating environment, defined strategic priorities, and current legal requirements.

6. Strategic Priorities of the Anti-Corruption Policy

1. The strategic priorities of the Agency for Restoration's anti-corruption policy for 2026–2028 are:

1) ensuring soundness, transparency, and accountability in the selection, prioritization, and implementation of projects; maintaining an appropriate level of control during the implementation of pilot projects; and monitoring and evaluating the results of their implementation to make informed decisions regarding the further application of proven approaches;

2) the implementation and improvement of digital tools aimed at enhancing the transparency, traceability, and objectivity of the processes involved in the preparation and adoption of management decisions;
3) ensuring the openness and accessibility of information regarding the implementation of the Agency for Restoration's anti-corruption policy in accordance with legal requirements;
4) strengthening oversight at all stages of procurement and contract execution, including procurements conducted under the procedures of international organizations: ensuring that contractors are screened for compliance risks, improving oversight of the Restoration Services' procurements—in particular, through the use of an electronic system for monitoring corruption risks—and strengthening monitoring of contract performance and payment discipline;
5) preventing undue influence and resolving institutional and personal conflicts of interest, including those that may arise in interactions with international partners and donors; ensuring transparent conditions for engagement with stakeholders within the scope and in the manner prescribed by the laws of Ukraine;
6) maintaining and developing human resources based on integrity; ensuring transparency, soundness, and impartiality in personnel management procedures at the Agency for Restoration and in legal entities under its jurisdiction; and strengthening the authority of the civil service;
7) streamlining the management of state-owned assets—clearly delineating the division of authority among the structural units of the Agency for Restoration; completing the corporatization of state-owned enterprises; strengthening financial and operational discipline among legal entities under the Agency for Restoration's jurisdiction; and ensuring that documentation, and timeliness of budget planning and financing procedures, and reducing the level of discretion in the exercise of managerial authority;
8) developing a system for reporting violations of the culture of integrity—ensuring effective protection for whistleblowers and an appropriate response to reports, fostering motivation among public servants to personally participate in preventing corruption, and strengthening the institutional capacity of the Sector for the Prevention and Detection of Corruption in its interaction with whistleblowers;
9) cooperation with civil society organizations, the Council for Transparency and Accountability of the State Agency for Restoration and Infrastructure Development of Ukraine, international organizations, and development partners on issues related to preventing and combating corruption;
10) enhancing the knowledge and anti-corruption awareness of civil servants at the Agency for Restoration and employees of legal entities under its jurisdiction.

These strategic priorities are aimed at ensuring that the Agency for Restoration adequately fulfills its functions in the public interest by establishing an effective system for preventing and combating corruption.

2. The achievement of the strategic priorities of the Agency for Restoration's anti-corruption policy is ensured by the tasks and measures set forth in Annex 1 to this Program and is assessed based on the performance indicators established therein.

The tasks and measures for implementing the principles of the Agency for Restoration's anti-corruption policy, as set forth in Annex 1 to this Program, are mandatory for responsible implementers to carry out within the established timeframes.

3. The Agency for Restoration recognizes its leadership role in fostering a culture of integrity within the sector under its jurisdiction. Within the scope of its powers as defined by law, as the entity responsible for managing state-owned property, the Agency for Restoration oversees the activities of legal entities under its jurisdiction, coordinates the implementation of anti-corruption measures and corruption risk management systems in their operations, provides them with methodological and advisory support, and expects their managers and employees to adhere to integrity standards no lower than those established by this Program.

4. Every civil servant of the Agency for Restoration bears personal responsibility for complying with the requirements of anti-corruption legislation, the Agency for Restoration's Code of Ethics and Conduct, and this Program; for acting with integrity, ethics, and professionalism; reporting instances of violations or suspected violations, and for contributing to the continuous improvement of the system for preventing and detecting corruption at the Agency for Restoration.

5. The Program is posted on the Agency for Restoration's official website and is open and accessible. The Program is communicated to the Agency for Restoration's civil servants, including newly appointed ones, in accordance with established procedures.

7. Responsibilities of Participants in the Implementation of the Anti-Corruption Policy

1. Civil servants of the Agency for Restoration, in accordance with the powers defined by law, the regulations on structural units, job descriptions, and this Program, participate in the implementation of the anti-corruption policy and carry out tasks related to preventing and combating corruption.

2. The Head of the Agency for Restoration ensures the implementation of the anti-corruption policy by:

1) supporting efforts to prevent and combat corruption in the Agency for Restoration's activities, demonstrating through personal example a zero-tolerance approach to corruption, and participating in the Agency for Restoration's anti-corruption initiatives;
2) encouraging civil servants of the Agency for Restoration to demonstrate leadership in preventing and detecting corruption within the scope of their authority;
3) adopting regulatory documents on the prevention and detection of corruption, including the anti-corruption program and amendments thereto;
4) ensuring the operation within the Agency for Restoration of an independent, authorized unit for the prevention and detection of corruption (hereinafter referred to as the "Sector"), in compliance with the guarantees of its independence established by law, and providing it with the organizational, material, and other resources necessary for the effective performance of its assigned tasks;

5) exercising overall management and oversight of the Program's implementation, and taking into account the results of monitoring and evaluation of its implementation when making management decisions;
6) adopting, in accordance with established procedures, decisions regarding the assessment of corruption risks in the activities of the Agency for Restoration, establishing a working group to assess corruption risks within the Agency for Restoration (hereinafter referred to as the "Working Group"), and approving and, if necessary, making changes to its membership;
7) providing the resources necessary for the effective management of corruption risks and promoting the continuous improvement of corruption risk management processes;
8) ensuring a timely and proportionate response to possible violations of the requirements of this Program, the commission of corruption or corruption-related offenses, and other violations of the Law.

3. Within the scope of their authority, the Head of the Sector ensures the implementation of tasks and measures aimed at carrying out the anti-corruption policy of the Agency for Restoration, namely:

1) organizes and coordinates efforts to assess corruption risks in the Agency for Restoration's activities and to develop measures to address them;
2) monitors and evaluates the implementation of the Program, monitors the Agency for Restoration's operating environment, and ensures a timely response to changes that may lead to the emergence of new corruption risks or alter the level of existing ones;
3) coordinates the activities of the Agency for Restoration's structural units regarding the implementation of the Program;
4) organizes and conducts, within the scope of its authority, audits of the state of work on preventing and detecting corruption in legal entities under the jurisdiction of the Agency for Restoration;
5) prepares proposals regarding the development, implementation, and improvement of the Agency for Restoration's anti-corruption policy;
6) implements measures to identify conflicts of interest and facilitates their prevention and resolution;
7) verifies whether the entities required to file declarations with the Agency for Restoration have submitted their declarations and notifies the National Agency on Corruption Prevention (NACP) of any instances of failure to file or late filing in the cases and in the manner prescribed by law;
8) monitors compliance, within the scope of its authority with the requirements of anti-corruption legislation and reviews reports of possible violations of such requirements in accordance with the procedure established by law;
9) ensures compliance with the rights and protections of whistleblowers within the scope of authority defined by law;
10) informs, in the cases and in the manner prescribed by law, the Head of the Agency for Restoration, the National Agency on Corruption Prevention (NACP), and/or other specially authorized entities in the field of anti-corruption about identified violations of the requirements of legislation in the field of preventing and combating corruption;

11) participates in organizing and conducting special background checks on individuals applying for positions for which a special background check is required by law;
12) informs the Head of the Agency for Restoration of the status of the Program's implementation based on the results of monitoring and evaluation of its implementation;
13) based on the results of monitoring and evaluating the Program's implementation, monitoring the operational environment of the Agency for Restoration, and in the event of identifying circumstances that may affect the management of corruption risks, prepares proposals in accordance with established procedures to amend the Program.

4. Heads of structural units and chief specialists, whose positions are independent according to the staffing table, ensure the implementation of the Anti-Corruption Policy of the Agency for Restoration within their respective areas of activity by:

1) organizing and ensuring the implementation of the measures provided for in the Program, including measures to address corruption risks for which they are designated as responsible implementers;
2) managing corruption risks in the activities of the respective structural unit during the preparation and adoption of management decisions;
3) informing the Sector of identified corruption risks and circumstances that may contribute to the emergence of new corruption risks or changes in the level of existing ones;
4) ensuring that employees of the relevant organizational unit comply with the requirements of this Program and anti-corruption legislation;
5) ensuring that employees of the relevant organizational unit participate in training, informational, and monitoring activities on ethics, integrity, and the prevention and detection of corruption;
6) providing the Sector with the information, documents, and proposals necessary to assess corruption risks, monitor the status of their management, and implement the measures to address corruption risks as provided for in the Program;
7) responding in a timely manner, within the scope of their authority, to possible instances of corruption or corruption-related offenses and other violations of the law.

5. Heads of structural units and chief specialists, whose positions are independent according to the staffing table, shall ensure that the Sector is provided with information on the status of implementation of the measures provided for in the Program for which they are designated as responsible implementers, as well as any proposals for improving the Program and managing corruption risks in accordance with the procedure set forth in Section IV of this Program.

6. Civil servants of the Agency for Restoration are required to:

1) comply with the requirements, prohibitions, and restrictions established by the Law, other laws of Ukraine, the provisions of this Program, the Code of Ethics and Conduct for Employees of the Agency for Restoration, and other internal documents of the Agency for Restoration regarding the prevention and combating of corruption;

2) inform their immediate supervisor or the Sector of any identified corruption risks and circumstances that may contribute to the emergence of new corruption risks or changes in the level of existing ones, and manage corruption risks within the scope of their authority while performing their official duties;
3) perform official duties in good faith, impartially, professionally, and in accordance with the principles of integrity;
4) take measures provided for by law to prevent and resolve actual or potential conflicts of interest;
5) refrain from taking part in decision-making or actions where an actual conflict of interest exists;
6) report, in the cases and in the manner prescribed by law and the internal documents of the Agency for Restoration, any possible instances of corruption or corruption-related offenses, as well as other violations of the law;
7) participate in training, informational, and monitoring activities on ethics, integrity, and the prevention and detection of corruption.

II. ASSESSMENT OF CORRUPTION RISKS IN THE ACTIVITIES OF THE AGENCY FOR RESTORATION

1. The assessment of corruption risks in the activities of the Agency for Restoration (hereinafter referred to as the “assessment”) was conducted in accordance with the Methodology for Managing Corruption Risks, approved by NACP Order No. 830/21 dated December 28, 2021 (hereinafter referred to as the “Methodology”), in the form of a self-assessment involving employees of the Agency for Restoration’s structural units and external experts.

2. To organize and conduct the assessment, Order No. H-387 of the Agency for Restoration, dated August 11, 2025, No. N-387 introduced changes to the membership of the Working Group on Corruption Risk Assessment at the State Agency for Restoration and Infrastructure Development of Ukraine (hereinafter—the Working Group), the regulations for which were approved by Order No. N-192 of the Agency for Restoration dated May 9, 2023.

The Working Group consists of 17 representatives from independent structural units of the Agency for Restoration and 3 representatives of external stakeholders, including experts from the United Nations Office on Drugs and Crime and the Basel Institute on Governance.

Information regarding the start of the assessment was published on the Agency for Restoration’s official website, and external stakeholders were given the opportunity to submit proposals for candidates to join the Working Group. No such proposals were received by the deadline.

An introductory training session on corruption risk assessment was conducted for the members of the Working Group, with the participation of representatives from the Sector and experts from the Basel Institute on Governance and the United Nations Office on Drugs and Crime.

3. The Working Group developed a plan for assessing corruption risks and preparing the Program, which outlines the main stages, tasks, deadlines for their completion, and responsible individuals.

4. During the analysis of the Agency's operating environment and the determination of the scope of the assessment:

1) the results of the preliminary corruption risk assessment, as well as the status and effectiveness of measures to mitigate those risks, were analyzed;
2) an anonymous survey of internal and external stakeholders was conducted, the results of which were summarized and taken into account when identifying functions and processes potentially vulnerable to corruption;
3) regulatory and legal acts, as well as organizational and administrative documents governing the Agency's operations, were analyzed;
4) the results of internal and external audits, inspections, and internal investigations, as well as materials regarding possible instances of corruption and corruption-related offenses, were analyzed;
5) analyzed appeals, complaints, and reports regarding the activities of the Agency for Restoration and its employees;
6) analyzed court decisions, information from state and departmental registries, information systems, and databases;
7) monitored and analyzed information from the media, social networks, and other open sources regarding potential corruption risks in the activities of the Agency for Restoration;
8) analytical materials, recommendations, and studies from the National Agency on Corruption Prevention (NACP), other government agencies, and international and civil society organizations were reviewed;
9) Strategic and programmatic documents, as well as plans for the activities, reform, and development of the Agency for Restoration, were analyzed;
10) analyzed information on the functions, processes, and internal environment of the Agency for Restoration's structural units, including materials generated as part of the internal control system;

5. The following methods were used to study the operating environment of the Agency for Restoration and identify corruption risks:

1) analysis of regulatory and legal acts, organizational and administrative documents, analytical reports, and other documents and information;
2) surveys (questionnaires) of internal and external stakeholders;
3) semi-structured interviews with internal and external stakeholders;
4) monitoring and analysis of information from open sources, registries, information systems, and databases;
5) modeling of possible methods and circumstances for committing corruption or corruption-related offenses;
6) other research methods provided for in the Methodology.

6. Based on the results of the study of the Agency for Restoration's operating environment, the information gathered and the suggestions from external and internal stakeholders—provided through participation in an anonymous survey—were synthesized, and functions and processes potentially vulnerable to corruption were identified, particularly in the following areas:

- planning and financial activities;
- road infrastructure restoration and development;
- civil infrastructure restoration and development;

- management of state-owned property;
- development and operation of border crossing points;
- international cooperation;
- public-private partnerships;
- identification of enterprises, institutions, and organizations critical to the construction industry;
- organizing the implementation of scientific (scientific and technical) research;
- protection of critical infrastructure facilities;
- legal support and claims and litigation;
- human resources management;
- public procurement;
- internal control and internal audit;
- prevention and detection of corruption.

The results of the study of the Agency for Restoration's operating environment are reflected in analytical reports.

7. The corruption risks identified and assessed by the Working Group, along with their determined levels of impact on the performance of functions and processes in the activities of the Agency for Restoration, are listed in the Register of Corruption Risks (Appendix 2 to this Program) (hereinafter referred to as the "Risk Register").

For each corruption risk, a measure (or measures) to address it and the person (or persons) responsible for implementing such measures, as well as the deadlines for their implementation, have been identified and are reflected in the Risk Register.

For each risk, performance indicators for the measure(s) have been identified; these indicators are measurable and, if met, will confirm that the measure to address the corruption risk has been implemented.

The measures to address corruption risks listed in the Risk Register are aimed at eliminating or minimizing their sources, and—if it is not possible to directly address the sources—at reducing the likelihood or potential consequences of their occurrence.

The elimination or minimization of a corruption risk may be achieved without developing specific measures to address such risks by deciding not to initiate or continue activities that give rise to such a corruption risk, within the scope and in the manner defined by the regulatory acts of anti-corruption legislation and the internal documents of the Agency for Restoration aimed at ensuring compliance with anti-corruption policies.

8. The draft Program, together with its annexes, was published on August 18, 2026, on the Agency for Restoration's official website for public discussion and to allow interested parties to submit proposals and comments by August 31, 2026.

Proposals regarding the draft Corruption Risk Register were received from the civil society organization "Risk Assessment Center." The proposals concern advance payments under procurement contracts, as well as the selection of projects for the reuse of construction materials, and have been partially incorporated into the Corruption Risk Register.

III. TRAINING AND AWARENESS-RAISING ACTIVITIES ON ETHICS, INTEGRITY, AND ANTI-CORRUPTION PROGRAMS

1. To enhance the knowledge of the Agency for Restoration's employees regarding professional ethics, integrity, and the prevention and detection of corruption; to develop practical skills in complying with anti-corruption legislation and the Code of Ethics and Conduct; and to foster a culture of integrity at the Agency for Restoration ensures the systematic conduct of training and informational-educational activities.

2. Training is conducted in accordance with the Training Program on Ethics, Integrity, and the Prevention and Detection of Corruption, set forth in Appendix 3 to this Program, which defines the topics of training events, their schedules, target audiences, and responsible implementers. The Sector is responsible for organizing and coordinating such training.

3. The Agency for Restoration provides organizational and methodological support and ensures the professional development of authorized personnel responsible for the prevention and detection of corruption at enterprises, institutions, and organizations under its jurisdiction, as well as at business entities for which the Agency for Restoration exercises management of corporate rights.

4. Taking into account current needs, the Sector may organize and conduct additional training and informational-educational activities not provided for in Appendix 3 to this Program.

The need for such events is determined based on:

- the results of corruption risk assessments and monitoring of the implementation of measures to address those risks;
- the results of assessments of employees' knowledge and awareness levels;
- identified instances of corruption or corruption-related offenses;
- the results of official and internal investigations;
- changes in legislation regarding corruption prevention;
- recommendations from the National Agency on Corruption Prevention (NACP) and other authorized bodies;
- the specific nature of the activities of organizational units and the needs of the relevant target audiences.

5. Information, educational, advisory, and explanatory work on issues of ethics, integrity, and the prevention and detection of corruption is carried out, in particular, regarding:

- rules of professional ethics and integrity;
- declaration of assets and other financial control requirements established by law;
- compliance with restrictions and prohibitions established by legislation in the field of corruption prevention;
- prevention and resolution of conflicts of interest;
- prevention of receiving improper benefits and handling of gifts;
- the procedure for submitting and reviewing reports of possible acts of corruption or corruption-related offenses, other violations of the Law, and safeguards for whistleblowers;

- managing specific corruption risks;
- liability for corruption and corruption-related offenses;
- other issues related to the application of anti-corruption legislation.

6. Information, educational, advisory, and explanatory activities may be carried out through the conduct of training sessions, workshops, seminars, webinars, consultations, and testing; the distribution of informational messages; the posting of information on internal information resources and the official website of the Agency for Restoration; as well as through the preparation and distribution of guidelines, step-by-step procedures, methodological materials, reference materials, and other informational resources.

7. Representatives of the National Agency on Corruption Prevention (NACP), other specially authorized entities in the field of anti-corruption, other government agencies, civil society and international organizations, as well as specialists and experts in the relevant field, may be invited to participate in training and awareness-raising events, subject to their consent.

8. If questions arise regarding the application of anti-corruption laws, employees of the Agency for Restoration may contact the Sector to receive verbal or written clarification (consultation).

Within the scope of its authority, the Sector provides the relevant explanations (consultations) and may also compile the most frequently asked questions and distribute relevant informational, methodological, and reference materials among the employees of the Agency for Restoration.

9. To assess the level of knowledge and awareness regarding the prevention and detection of corruption, the Sector may administer tests to civil servants of the Agency for Restoration and/or authorized persons responsible for the prevention and detection of corruption at enterprises, institutions, and organizations under the Agency for Restoration's jurisdiction, as well as business entities for which the Agency for Restoration exercises management of corporate rights.

The frequency, target audience, and topics of the testing are determined based on the results of corruption risk assessments, changes in legislation, the results of previous testing, and the need to improve professional competence

IV. MONITORING, EVALUATION OF IMPLEMENTATION, AND REVIEW OF THE PROGRAM

1. Monitoring the Implementation of the Program

1. The Sector monitors the Program's implementation at least once every six months to track its progress, identify shortcomings in a timely manner, and ensure proper management of corruption risks.

2. Monitoring the implementation of the Program involves collecting, summarizing, and analyzing information on the status, completeness, and timeliness of the measures provided for therein, the achievement of established indicators, and the relevance of the measures, taking into account changes in the environment in which the Agency for Restoration operates.

3. During monitoring, the actual status of implementation of the measures set forth in the Program and its annexes is analyzed, in particular, measures to

implement the principles of anti-corruption policy, the implementation of the State Anti-Corruption Program, measures to address corruption risks, and training and awareness-raising activities.

4. Heads of structural units and chief specialists whose positions are independent according to the staffing table are responsible for the implementation of the measures provided for in the Program; on a quarterly basis, by the 10th day of the month following the reporting quarter, they shall submit information on the status of implementation of the relevant measures, along with supporting materials, to the Sector via the ASKOD electronic document management system.

In the event of non-implementation or untimely implementation of a measure, the reasons for such non-implementation (or untimely implementation) shall be specified, along with information on the measures taken and, if necessary, proposals for the further implementation of the relevant measure.

Information on the implementation of measures under the State Anti-Corruption Program, for which the Agency for Restoration has been designated as the responsible implementer or co-implementer, shall be submitted within the timeframes and in accordance with the procedures established by law.

5. The internal audit unit and the chief specialist for internal control coordination, within the scope of their authority, shall inform the Sector of any circumstances identified as a result of internal audits and internal control measures that may indicate the presence of new corruption risks, changes in the level or sources of existing corruption risks, deficiencies in control measures, or the need to revise the measures provided for in the Program.

6. The Sector analyzes and summarizes the information received and, based on the monitoring results, prepares reports on the status of the Program's implementation for the first half of the year and for the full year.

If deficiencies are identified, measures are not implemented or are implemented late, the operating environment of the Agency for Restoration changes, or other circumstances arise that may affect the management of corruption risks, the report shall include relevant conclusions and, if necessary, proposals for taking additional measures, conducting an additional assessment of corruption risks, or revising the Program.

7. The following statuses are used when monitoring the status of measure implementation:

- **"completed"** — the measure has been implemented and the specified performance indicator has been achieved;
- **"ongoing"** — the measure is of a continuous or periodic nature and is being implemented in accordance with the established schedule;
- **"in progress"** — implementation of the measure has begun, and the deadline for its completion has not yet passed;
- **"Deadline Not Yet Reached"** — implementation of the measure is scheduled for the next reporting period;
- **"Not Completed"** — the established deadline for the measure has passed, but the specified performance indicator has not been achieved.

8. Reports on the results of monitoring the Program's implementation for the first half of the year and for the full year are submitted to the Head of the Agency for Restoration and published on the Agency for Restoration's official website. The Agency for Restoration also informs the National Agency on Corruption Prevention (NACP) about the status of the Program's implementation in accordance with established procedures.

The NACP is informed of the status of implementation of the measures under the State Anti-Corruption Program in accordance with the procedures and deadlines established by law.

The Transparency and Accountability Council of the Agency for Restoration, representatives of civil society organizations and international organizations, and experts in the field of corruption prevention may be involved in monitoring and discussing the results of the Program's implementation.

2. Evaluation of the Program's Implementation

1. The Sector shall evaluate the Program's implementation upon its expiration to determine the effectiveness and efficiency of the measures it entails, assess changes in the corruption risk management system, and prepare proposals for further improving the Agency for Restoration's anti-corruption policy.

The results of monitoring the Program's implementation are taken into account during its evaluation.

2. The effectiveness of the Program's implementation is assessed taking into account:

- the completeness of the implementation of the measures provided for in the Program and the achievement of the specified indicators;
- the timeliness of the measures' implementation;
- the status of implementation of measures to address corruption risks;
- the achievement of the expected results of the measures.

3. The completeness of a measure's implementation is determined by whether the performance indicator established for it has been met and is confirmed by relevant documents or other information.

The timeliness of a measure's implementation is determined by compliance with the deadline for its implementation established by the Program.

For measures of a permanent or periodic nature, implementation is assessed based on compliance with the established frequency and the achievement of the relevant indicators over a specified period.

4. The effectiveness of the Program's implementation is assessed based on the actual impact of the implemented measures on the sources and level of identified corruption risks, the functioning of control measures, and the achievement of the Program's objectives.

When assessing effectiveness, the following are taken into account, in particular:

- the results of any repeat or additional assessments of corruption risks, if conducted;
- changes in the sources, levels, and nature of identified corruption risks;
- the results of internal and external audits, inspections, and other control measures;

- the results of surveys of internal and external stakeholders;
- the level of employee awareness regarding corruption prevention, ethics, and integrity;
- the results of the analysis of reports regarding possible instances of corruption or corruption-related offenses, other violations of the law, and the response to them;
- other information that allows for an assessment of the actual impact of the implemented measures on the state of corruption prevention and counteraction at the Agency for Restoration.

5. Based on the results of the assessment of the Program's implementation, the Sector prepares a report containing conclusions regarding the effectiveness and efficiency of its implementation, the status of corruption risk management, identified issues, and proposals for further improvement of the Agency for Restoration's anti-corruption policy.

The report is submitted to the Head of the Agency for Restoration and published on the Agency for Restoration's official website.

6. Failure by civil servants of the Agency for Restoration to comply with or improper compliance with the requirements of this Program shall entail liability in the cases and in the manner prescribed by law.

3. Review and Amendment of the Program

1. The Program is subject to review in the event of:
- significant changes in the operating environment of the Agency for Restoration, in particular, its functions, powers, organizational structure, or processes;
- changes to legislation that affect the provisions of the Program or the corruption risk management system;
- the adoption of the State Anti-Corruption Program and the need to include measures for its implementation in the Program;
- the identification, based on the results of monitoring or evaluation of the Program's implementation, of shortcomings or insufficient effectiveness of the measures provided for therein;
- the identification of new corruption risks or a significant change in the level or sources of previously identified corruption risks;
- the need to take into account the results of an additional assessment of corruption risks;
- the NACP's refusal to approve the Program or the need to take into account proposals provided by the NACP;
- in other cases where amendments are necessary to ensure the Program's relevance and effectiveness.

2. Civil servants of the Agency for Restoration, as well as other internal and external stakeholders, may submit proposals to the Agency for Restoration regarding the revision of the Program.

If circumstances arise that may warrant a revision of the Program, the Sector analyzes their impact on the Program's provisions and, if necessary, submits a proposal for revision to the Head of the Agency for Restoration.

A review of the Program may be preceded by an additional assessment of corruption risks in accordance with the Methodology.

3. Based on the results of the review, changes may be made to the Program and its annexes, including, in particular:

- the inclusion of new measures, or the modification or exclusion of measures provided for in the Program;
- clarification of the content of measures, their implementation deadlines, responsible parties, and performance indicators;
- making changes to the Register of Corruption Risks;
- updating other provisions of the Program and its annexes.

4. Draft amendments to the Program are prepared by the Sector with the involvement, as necessary, of the Working Group, relevant structural units of the Agency for Restoration, and other interested parties.

Amendments to the Program are approved by order of the Agency for Restoration, submitted to the National Agency on Corruption Prevention (NACP) for approval in the cases and in the manner prescribed by law, and published on the Agency for Restoration's official website.

Head of the Sector
for Corruption Prevention and Detection **Olga PERMINOVA**