

**NATIONAL ACADEMY OF SCIENCES OF UKRAINE
GENERAL ENERGY INSTITUTE
(GEI of the NAS of Ukraine)**

APPROVE

Director of the GEI of the NAS of
Ukraine

Academician of the NAS of Ukraine


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**BUSINESS ETHICS AND CODE OF CONDUCT
of the General Energy Institute of the NAS of Ukraine**

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1. GENERAL PROVISIONS

1.1. Purpose

This Code sets out the core principles of business ethics, integrity, transparency, impartiality, and responsible conduct for employees of the General Energy Institute of the National Academy of Sciences of Ukraine (the “Institute”) in the performance of official, scientific, administrative, contractual, and operational duties.

1.2. Scope

This Code applies to all Institute personnel, including management, researchers, administrative staff, temporary performers, consultants, interns, and any person acting on behalf of the Institute in connection with contracts, grants, projects, procurement, and third-party cooperation.

1.3. Legal Basis

This Code is based on Ukrainian law, the Institute’s founding documents, academic integrity principles, and applicable contract requirements, including contracts containing FAR 52.203-13 and related business ethics and conduct requirements.

1.4. Institutional Character

The Institute is a public scientific institution that carries out independent scientific work and does not operate for the purpose of distributing profits among employees or management. All decisions must serve the scientific mission of the Institute, the public interest, and the state.

2. CORE PRINCIPLES

Institute personnel shall:

- 2.1. act honestly, diligently, impartially, and professionally;
- 2.2. comply with Ukrainian law, contractual terms, internal rules, and Institute policies;
- 2.3. avoid any act that may be regarded as corruption, fraud, collusion, abuse of authority, misappropriation, forgery, conflict of interest, or other improper conduct;
- 2.4. protect the reputation of the Institute and preserve trust in its scientific results and decisions;
- 2.5. respect human rights, academic freedom, equality, and non-discrimination.

3. ANTI-CORRUPTION AND IMPROPER ADVANTAGE

3.1. Any form of offering, giving, requesting, promising, or receiving an improper advantage is prohibited.

3.2. Personnel shall not directly or indirectly use their official position for personal, property, or non-property gain for themselves, relatives, related persons, or third parties.

3.3. Gifts, hospitality, entertainment, or other courtesies are allowed only to the extent permitted by law and internal rules and only where they cannot influence impartiality.

3.4. Personnel must refuse any conduct that may create the appearance of dependence, bias, or influence-peddling.

4. CONFLICT OF INTEREST

4.1. Personnel shall avoid actual, potential, or apparent conflicts of interest.

4.2. If a conflict of interest arises, the employee shall promptly notify the direct supervisor and the authorized anti-corruption officer.

4.3. The employee shall not participate in the preparation, discussion, approval, or implementation of a decision where a conflict of interest may exist, unless and until the matter is formally resolved.

4.4. Particular attention must be paid to conflicts of interest in publications, expert reviews, procurement, grants, tenders, contractor selection, staffing, and allocation of resources.

5. INTEGRITY IN SCIENTIFIC ACTIVITY

5.1. The Institute supports the independence of scientific conclusions, data objectivity, reproducibility of results, and openness to verification.

5.2. Fabrication, falsification, plagiarism, data manipulation, concealment of material findings, and false authorship are prohibited.

5.3. Scientific results, expert opinions, and analytical materials shall be prepared free from improper external pressure. For commissioned work, the distinction between scientific assessment and the customer's position must remain clear.

5.4. Participation in external commissions, reviews, editorial boards, advisory bodies, and projects is allowed only where no unresolved conflict of interest exists.

6. PROCUREMENT, CONTRACTS, GRANTS, AND FUNDS

6.1. All procurement, contracting, grant spending, and contract performance shall be transparent, properly documented, and lawful.

6.2. Forgery, overstatement of costs, unjustified acceptance of work, double-charging of the same expense, and similar abuses are prohibited.

6.3. Personnel shall maintain accurate records of time, resources, deliverables, expenditures, and reporting data within their authority.

6.4. The Institute shall conduct appropriate due diligence on counterparties and engaged persons to identify risk of misconduct.

7. REPORTING MISCONDUCT

7.1. Every employee must promptly report known or reasonably suspected violations of this Code, corruption, fraud, forgery, conflicts of interest, embezzlement, abuse, or other improper acts.

7.2. Reports may be submitted to the direct supervisor, the authorized anti-corruption officer, internal control function, or any other designated channel.

7.3. Where permitted by internal procedures, reports may be made confidentially or anonymously.

7.4. The Institute shall review reports, document outcomes, and implement corrective actions.

8. WHISTLEBLOWER PROTECTION AND NON-RETALIATION

8.1. Retaliation, pressure, discrimination, dismissal, adverse change in working conditions, or any negative consequence for a good-faith report is prohibited.

8.2. Persons who report in good faith are protected to the extent provided by Ukrainian law and internal Institute procedures.

8.3. Abuse of the reporting mechanism, knowingly false reports, or deliberate deception may result in disciplinary action.

9. INTERNAL CONTROL, TRAINING, AND MONITORING

9.1. The Institute shall maintain an internal control system proportionate to its size, structure, and activity profile.

9.2. The internal control system shall include:

- a) responsibility assigned at an appropriate level;
- b) periodic reviews and risk assessment;
- c) reporting mechanisms;
- d) recordkeeping and retention;
- e) disciplinary and corrective measures.

9.3. The Institute shall provide regular training on ethics, anti-corruption, conflict of interest, integrity, data protection, information security, and proper documentation.

9.4. Heads of units must support a culture of integrity by personal example.

10. INFORMATION HANDLING AND CONFIDENTIALITY

10.1. Personnel shall protect official, scientific, commercial, personal, and other confidential information.

10.2. Disclosure is permitted only on lawful grounds, on a need-to-know basis, or with written authorization from an authorized person.

10.3. Institute information may not be used for private gain, insider advantage, or improper influence on third parties.

11. RELATIONS WITH CONTRACTORS, PARTNERS, AND THIRD PARTIES

11.1. The Institute expects counterparties and partners to comply with the law, honesty, integrity, and anti-corruption requirements.

11.2. The Institute may include ethical conduct, conflict-of-interest, audit, reporting, and termination provisions in contracts where appropriate.

11.3. Persons engaged to act on behalf of the Institute under contracts or projects shall be informed of this Code and must comply with it to the extent applicable to their activities.

12. DISCIPLINARY CONSEQUENCES

12.1. Violation of this Code may lead to disciplinary, administrative, civil, or other measures under applicable law.

12.2. The response shall depend on the nature of the violation, its consequences, intent, repetition, and the degree of harm to the Institute.

12.3. A valid report of misconduct does not exempt any person from responsibility for their own improper acts.

13. FINAL PROVISIONS

13.1. This Code is binding on all persons within its scope.

13.2. Each employee shall acknowledge receipt and review of this Code in writing or electronically.

13.3. The Code shall be reviewed periodically and updated as needed to reflect changes in law, contract requirements, practice, and institutional risk.

13.4. In case of any conflict between this Code and the law, the law shall prevail.