



# UKRAINIAN PRIVATE MILITARY COMPANY

[www.upmc.com.ua](http://www.upmc.com.ua)

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Ukrainian Private Military Company seeks to operate exclusively in a lawful manner and comply with the applicable legislation, undertaken contractual, moral and ethical obligations. We respect our partners, promote mutual trust, provide quality professional services, ensuring complete confidentiality and avoiding conflicts of interest. Our Company continuously and effectively evaluates monitors and controls the activity of its personnel, conducting continuous training and creating harmonious comradely environment. The Company prohibits any discrimination and guarantees the compliance with the gender equality.

In order to comply with the abovementioned principles and commitments, the Ukrainian Private Military Company have established appropriate conditions and procedures that allow its personnel, other stakeholders and third parties to report any potential violations of the rules and regulations of the International Code of Conduct for Private Security Providers (ICoC), international or Ukrainian legislation, regulatory documents of the Ukrainian Private Military Company etc. Any alleged violations and notices can be received and registered by calling at +380 97 195 02 32 or by e-mailing to [appeal@upmc.com.ua](mailto:appeal@upmc.com.ua).

All calls and emails can be received 24 hours a day and this will be treated as sensitive information and may be anonymous. The applicant's identity cannot be disclosed of without his/her consent. The acknowledgement of the alleged violations and notices shall be submitted to the applicant within 24 hours, and an official response - within 30 days.

The Ukrainian Private Military Company is committed to:

- Immediately and impartially investigate into the alleged violations and notices in compliance with the requirements of the Ukrainian legislation on the protection of personal data;
- Register any received alleged violations and complaints, indicating the responsible person for the investigation and applied disciplinary measures;
- Cooperate at any time with official law enforcement and investigating authorities and assist in providing testimony by the Company's personnel;
- Apply all appropriate disciplinary measures, including discharge, in the event of detection of violations of the rules and regulations of the International Code of Conduct for Private Security Providers (ICoC), international or Ukrainian legislation, regulatory documents of the Ukrainian Private Military Company etc.;
- Exclude any coercion or repressions against any person who reported the violations of the rules and regulations of the International Code of Conduct for Private Security Providers (ICoC), international or Ukrainian legislation, regulatory documents of the Ukrainian Private Military Company etc.

The Ukrainian Private Military Company will conduct appropriate checks of all alleged violations and complaints in compliance with the Ukrainian and international legislation, and immediately notify the relevant authorities of any violations of the criminal law by the Company's personnel.

In addition, any complaints and notices of illegal actions by the personnel of the Ukrainian Private Military Company can be sent directly to the International Code of Conduct Association for Private Security Providers (ICoCA).