

American Chamber of Commerce in Ukraine Code of Conduct

As Members of the American Chamber of Commerce, the goal is to operate and conduct business in accordance with the law of the land and to accept certain guiding principles based on U.S. and Western business practices as a preferred code of conduct. Without attempting to draw up detailed guidelines to govern every situation that might arise in the course of diverse and complex business activity in Ukraine, the American Chamber of Commerce has established these basic principles only as general operating guidelines that all Members are expected to follow:

- Members will make every effort to comply with the laws of Ukraine to which they are subject
- Members will avoid knowingly assisting any third party in violating any law of Ukraine
- Members will not knowingly pay or receive bribes or participate in any other unethical, fraudulent, or corrupt practice
- Members will endeavor to honor all business obligations and commitments that they undertake with professionalism and integrity
- Members will keep business records in a manner that properly reflects the true nature of their business transactions and activities
- Members will ensure that their management and supervisors are familiar with applicable labor laws and corporate policies and will take responsibility for preventing and detecting violations in the course of their business operations
- Members will not be engaged into any concerted competitive behaviour (action or inaction) with other business entities, such behaviour being qualified as anti-competitive concerted actions under Ukrainian law, unless such behaviour has been duly approved by the Antimonopoly Committee of Ukraine or other competent state body in advance, as the case may be
- Members will not directly or indirectly offer, pay, receive or authorise any third parties to offer, pay or receive without justification advantages of any kind (bribes) or participate in any other unethical, fraudulent, or corrupt practices

The principles outlined here are not intended to preclude business or professional relationships that are recognized as both legal and acceptable under applicable law and custom, and that would not cause embarrassment to any party involved, if publicly known.