

05.11.2025 Kyiv № 1/2025-κ

CODE OF ETHICS

Members of the Public Association

"UKRAINIAN DUAL-USE TECHNOLOGY CLUSTER"

(UADUT Cluster)

This Code of Ethics is aimed at creating an environment of integrity and responsibility, in which all participants can and want to develop successfully and achieve their personal and shared goals ethically.

This Code of Ethics is a system of rules and standards of behavior that must be followed by all members, experts, mentors, investors, and entrepreneurs who are part of the Public Association.

The purpose of this CODE OF ETHICS is to consolidate efforts and ensure effective interaction among all members of the Public Association, aimed at building a productive and successful cooperation.

To obtain the status of "Member of UADUT Cluster," it is mandatory to read this Code of Ethics and provide written consent to its content.

1. General Provisions All individuals and organizations that are members of the Public Association "Ukrainian Dual-Use Technology Cluster" (hereinafter – UADUT Cluster), its governing bodies, employees, and invited experts are obliged to familiarize themselves with and comply with the provisions of this Code of Ethics.

The Code of Ethics establishes general principles and rules of ethical partnership and business conduct, which all UADUT Cluster members must follow in their internal and external relationships and cooperation.

The Code is a system of moral and professional values and rules of organizations that have united in the UADUT Cluster and their personnel, who voluntarily commit to adhering to these rules in their professional activities and interactions both within the Cluster and with the external environment.

All members, governing bodies, and employees agree that:

- The principles and rules of this Code apply to communications with partners, clients, beneficiaries, and other stakeholders;
- Communications with these parties, including media and social networks, must positively influence the image and reputation of the UADUT Cluster and its members, and comply





The priority of this Code is to focus on relationships that are not otherwise legally regulated or specifically formulated.

2. UADUT Cluster Values

- 2.1. UADUT Cluster values shape and reflect the internal culture of its founders and all members.
- 2.2. These values represent a shared position and define principles for internal interactions and building external relations.
- 2.3. Values uniting all participants:
 - Humanity
 - Mutual Respect
 - Mutual Support
 - Integrity
 - Ethics
 - Trust
 - Professionalism
 - Cooperation
 - Result Orientation

3. Principles of Interaction

- 3.1. Win-Win: Members cooperate respectfully and mutually beneficially, striving for at least a minimally acceptable outcome for all parties.
- 3.2. *Honesty:* Members always act honestly, provide accurate information, and avoid misleading others or using manipulative tactics.
- 3.3. *Transparency:* Members act openly with each other and provide timely, truthful information to all stakeholders.
- 3.4. *Responsibility:* Each member is responsible for their words, actions, and consequences. Mistakes are acknowledged and corrected.
- 3.5. Care for Others and the Environment: Members minimize harm, act with social responsibility, and provide quality services, technologies, and opportunities.





- 3.6. Respect and Understanding: Members respect differing views, foster mutual understanding, and base interactions on constructive dialogue.
- 3.7. Fairness: Members build long-term, mutually beneficial relationships and treat others fairly and humanely.
- 3.8. *Confidentiality:* Members protect confidential information acquired within the Cluster and avoid disclosing it in ways that could harm others, the Cluster, or its partners.
- 3.9. *Conflict of Interest Prevention:* Members declare and take measures to minimize potential conflicts. The Cluster handles conflicts as described in Section 5.
- 3.10. *Ethical Conduct:* Members compete fairly, avoid unethical practices, and prevent professional conflicts with other members and stakeholders.
- 3.11. *Political and Religious Neutrality:* Members focus on the Cluster's mission, vision, and goals without influence from political or religious affiliations. Activities serve public good without bias.

4. Ethical Conduct

4.1. Integrity Compliance:

- Impartiality: All actions and decisions must be fair and unbiased.
- *Openness:* Members are open to feedback, discussion, and dialogue.
- *Reliability:* Members fulfill commitments and notify partners of any changes promptly.

4.2. Criteria of Ethical Conduct:

- Fulfilling Obligations: Commitments are upheld unless jointly revised.
- Accountability: Members accept obligations they are able to fulfill and understand the consequences of failure.
- Anti-Corruption: All forms of fraud and secret deals are rejected.
- *Professional Competence:* Members constantly improve and share knowledge.
- Respect for Intellectual Contributions: All members' input is acknowledged.





4.3. Ethics Commission:

- *Structure:* The commission consists of five elected members from different organizations, respected and trusted. May be expanded.
- *Mandate:* One-year term, re-election possible. Replacements occur as needed.
- *Responsibilities:* Investigate violations, mediate conflicts, issue disciplinary measures.

5. Conflict Resolution Procedures

- 5.1. Complaint Submission: Any member may submit a written or electronic complaint.
- 5.2. *Investigation*: The commission reviews evidence, hears parties, and may sanction violations.
- 5.3. Assessment: Conflicts are evaluated per the Code.
- 5.4. *Decision:* Actions include warnings, recommendations, suspension, or expulsion. Public disclosure only after internal review and General Assembly approval.
- 5.5. Appeal: Decisions may be appealed within 30 days and reviewed by the General Assembly.

6. Final Provisions

- 6.1. The Code enters into force upon approval by the General Assembly.
- 6.2. Amendments can only be made by the General Assembly.
- 6.3. Members are encouraged to promote these ethical norms in their networks and communication.

The Code fosters trust and mutual understanding within the UADUT Cluster and contributes to the growth and success of every Person and Organization.

Acting in accordance with this CODE OF ETHICS makes a positive contribution to the development of the UADUT Cluster, the region, the country, the world, and each other.

Be ethical — and join UADUT Cluster!

Approved by the General Assembly. November 5, 2024.

