

Brussels, 17 February 2026

## Code of Ethics

The non-profit Association (*association sans but lucratif* – ASBL) Board of Directors adopted the Ukraine Cultural Heritage Fund (UCHF) Code of Ethics on XX February 2026.

### I. Issues

The Association Board provides the UCHF with a Code of Ethics to address three issues:

- the necessary development of a culture of integrity within the Association, in all its aspects, i.e. individual and collective behavior that respects both values that are universally accepted, such as those of the Charter of the United Nations, Universal Declaration of Human Rights, and the principles of ethics set out in this Code;
- the desire to contribute, via the day-to-day activities of the UCHF and the partnerships it develops, to the preservation, protection and restoration of cultural heritage, as well as to the development and promotion of culture in Ukraine, in accordance with its educational, cultural and scientific mission;
- the wish to guarantee trust from all of its partners, be they donors or beneficiaries, via its ambitious activities and the respect of ethical principles, thus guaranteeing the Association's standing and sustainability as well.

### II. Field of application

Within the scope of their function in the Association, the members of the Board, the General Assembly, the Expert Committee, the Audit Committee, the Ethics and Governance Committee, and any other committees, and those of the General Secretariat, as well as any third parties mandated by the Association or its representatives, will ensure that they respect this Code of Ethics.

The Association will also ensure that it promotes this Code within the scope of its partnerships with donors, suppliers and beneficiaries of its grants and activities, as well as the public authorities, states or and local authorities with which it develops relationships.

The term "member" in the present Code designates the individuals participating in the various UCHF bodies.

### III. Rights, principles and values

#### 1. Respect of rights

The UCHF is a non-profit Association (*association sans but lucratif* – ASBL) created under Belgian law and established in accordance with Article 1:2 of the Belgian Code of Companies and Associations (*Code des sociétés et des associations*), registered with the Registry of the Enterprise Court (*greffe du tribunal de l'entreprise*) and entered in the Crossroads Bank for Enterprises (CBE). It is a legal entity under Belgian private law.

UCHF conducts its activities in accordance with the resolutions of the United Nations, in particular, Security Council Resolution 2347 of 24 March 2017.

The Association ensures that its activities conform with the international conventions relating to heritage, in particular:

- the Convention for the Protection of Cultural Property in the Event of Armed Conflict (Convention of The Hague and first protocol, 1954, and second protocol, 1999);
- the Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transport of Ownership of Cultural Property (UNESCO, 1970);
- the UNIDROIT Convention on Stolen or Illegally Exported Cultural Property (UNIRIGHT, 1995);
- the Convention on the Protection of the Underwater Cultural Heritage (UNESCO, 2001);
- the Convention for the Safeguarding of the Intangible Cultural Heritage (UNESCO, 2003).
- the Convention on the Protection and Promotion of the Diversity of Cultural Expressions (UNESCO, 2005);
- the Recommendation concerning the Status of the Artist (UNESCO, 1980);

- the International Covenant on Economic, Social and Cultural Rights, notably Article 15 (ICESCR, 1966);
- the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS Agreement, WTO, 1994);
- WIPO Copyright Treaties (1996).

The UCHF also respects the laws of the countries in which its activities, and in particular, the projects which it supports, are undertaken.

The UCHF conducts its activities in full respect of Ukraine's national sovereignty and territorial integrity, as recognised by international law, and ensures that its approach to cultural heritage is guided by respect for cultural integrity.

## **2. Implementation of principles**

### **a. Objective**

Based on its Statutes, the Association is a non-profit organization with an educational, cultural and scientific aim.

Its objective, as a multi-donor platform for international support, is to attract, leverage, manage, and invest financial and other resources for the implementation of programmes and projects supporting the preservation, protection, and restoration of cultural heritage, as well as the development and promotion of culture and creative industries in Ukraine.

The Association pursues a strictly non-profit purpose. Its activities may be carried out anywhere in the world, in accordance with its Statutes and applicable law.

The cultural property falling within the scope of the activities of the Association are those defined as such by Article 1 of the Convention for the Protection of Cultural Property in the Event of Armed Conflict, signed in The Hague on 14 May 1954.

The Association also supports cultural and creative industries, in line with the Convention on the Protection and Promotion of the Diversity of Cultural Expressions (UNESCO, 2005), including the creation, production, dissemination, and access to cultural expressions, as well as the protection of artists and cultural professionals.

### **b. Guiding principles**

In all the activities it undertakes and in all programmes and projects it supports or finances, the Association shall ensure that:

- a. priority is given to the preservation, protection, restoration, rehabilitation, and sustainable use of cultural heritage and cultural activities in line with its statutory purpose;
- b. actions are conducted in compliance with applicable laws and with due respect for the cultural, institutional, and social contexts in which they take place;
- c. the principles of respect for national sovereignty and territorial integrity of Ukraine as recognised by the United Nations, adherence to provenance, preservation of cultural integrity, application of decolonisation approaches, and compliance with applicable international legal frameworks, including relevant sanctions measures, are upheld;
- d. whenever relevant, the major competent international organizations, including UNESCO, are informed;
- e. actions are consistent with the principles of transparency, non-discrimination and effectiveness;
- f. actions encourage cooperation, partnership, and, where appropriate, the involvement of relevant local stakeholders and communities;
- g. all actions are designed and carried out in accordance with recognized professional, technical and scientific standards;
- h. actions are designed and implemented with due regard to environmental sustainability and climate considerations, in a manner proportionate to the scale, nature and context of the intervention;
- i. relevant safeguards and professional standards applicable to the protection of cultural heritage are respected;

- j. the resources entrusted to the Association are used responsibly and exclusively for the purposes for which they are allocated.

### 3. Promotion of values

The UCHF promotes the following values:

- the protection of heritage
- respect for the national sovereignty and territorial integrity as recognised by the United Nations
- peace and reconciliation
- rejection of armed aggression, of its justification and denial
- international solidarity
- cultural and religious diversity
- education and capacity building
- social cohesion and peaceful coexistence
- contribution to sustainable local development
- gender equality

## IV. Fundamental duties

### 1. Respect of business ethics

The members of the Association Board, the General Assembly, the Expert Committee, the Audit Committee, the Ethics and Governance Committee, and any other relevant committees that may consult on the UCHF's operations, as well as of the General Secretariat will, in particular, commit to:

**a. point out any conflicts of interest**, i.e. any situation of interference between a public interest and public or private interests that might influence or be viewed as influencing the independent, impartial and objective execution of their function, **and refrain from taking illegal interests**;

**b. not instigate or fall prey to corruption**, corruption being criminal behavior on the part of the corrupt individual, who either solicits, agrees to or accepts a donation, offer or promise, gifts, or any other advantages with a view to carrying out, delaying or failing to accomplish an act which is a direct or indirect part of their functions;

**c. not accept gifts, favors, loans or other personal advantages which might be offered to them considering their position**. Occasionally, professional courtesy may lead to offering and receiving gifts. As such, gifts of a value of less than EUR 100 or invitations related to a function (meals, cultural events, conferences etc.) may be accepted. In case of doubt, for members of the General Secretariat, the decision shall be taken by the Managing Director; for the Managing Director, the decision shall be taken by the Chair of the Board; for members of the Board, including the Chair, the decision shall be taken by the Board, without the participation of the person concerned;

**d. in the case of employees of the General Secretariat, not have other jobs or activities, or accept outside commissions** which conflict or appear to conflict with the interests of the UCHF.

### 2. Respect of work ethics

The members of the Association Board, the General Assembly, the Expert Committee, the Audit Committee, the Ethics and Governance Committee, and any other relevant committees that may consult on the UCHF's operations, as well as of the General Secretariat will, in particular, commit to:

**a. the promotion of diversity and equality, especially between women and men, and the fight against discrimination**, be it within the General Secretariat, the General Assembly, the Board or the committees of the UCHF;

**b. political, scientific and technical impartiality**, in particular, in the treatment of requests for financial aid throughout the project selection;

**c. act with loyalty and good faith towards the Association, its governing bodies and its representatives**, in order to contribute to the effective and lawful achievements of its objectives;

**d. exemplarity and moderation in external communication and public statements**, in particular with regard to international organizations, governmental authorities, and those representing the economic sector and civil society;

**e. a duty of discretion** regarding all non-public information obtained in the course of activities within the Association, and respect the confidentiality of such information, in accordance with the law applicable to the Association;

**f. the respect of the environment**, for example via an energy-saving policy in the UCHF's offices and the reduction of its carbon footprint by rationalizing meetings and travel.

**g. respect for national for national sovereignty and territorial integrity of Ukraine** as recognised by the United Nations, and adherence to international law; in this context, cooperation with individuals or entities whose actions or positions are incompatible with these principles is considered inconsistent with the Association's mission and ethical framework.

### **3. Respect of the ethics of activities**

Through its activities and partnerships, the UCHF must contribute to promoting its values. In particular, the Association must make every effort to:

**a. develop an open and constructive dialogue with all potential partners**, be they international organizations, states, local authorities, or those representing the economic sector and civil society. In this respect, refrain from entering into or maintaining relationships with political groups, public authorities, or other entities where such relationships would be incompatible with the Association's mission or with the legal and compliance obligations applicable to its activities;

**b. promote, through its partnerships and funding agreements, respect for ethical principles by entities benefitting from the Association's support**, including internationally accepted human rights and labour standards relating to working conditions and the prohibition of child labour;

**c. contribute to the respect, by its partners, for international, regional and national legal frameworks applicable to the protection of cultural property and the fight against looting and illicit trafficking**, in particular through the provisions of its funding and partnership agreements;

**d. gain support from public and private donors whose mission and values align with those of the UCHF**. To this end, the Association shall take all necessary measures to prevent any involvement in money laundering or other illicit activities and shall comply with all applicable Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) obligations;

**e. promote, via its action and support, the development and dissemination of internationally recognized standards and good practices** contributing to the protection of heritage in conflict, post-conflict and crisis areas, including in the field of data collection for documentation and cataloguing purposes;

**f. avoid spreading rumors or false information** which could be particularly harmful in the areas where it is active. The UCHF will therefore ensure that it properly coordinates its communication, especially during times of crisis or in regard to these areas;

**g. uphold through its activities and partnerships, respect for national sovereignty and territorial integrity of Ukraine as recognised by international law**, and adhere to principles of international law, including the non-use of force, by refraining from any conduct or association involving the justification, denial, or legitimisation of military aggression.

## **V. Implementation**

### **1. General principle**

The present Code is not intended to exhaustively list all situations in which questions of ethics may arise. Each person should draw inspiration from the principles set out in this Code to determine the most appropriate behavior in circumstances other than those described herein.

### **2. Awareness**

The UCHF will ensure that it creates awareness among the employees of the General Secretariat, the members of its Board, its General Assembly and of its various Committees, the third parties working on its behalf and its partners, of the rules set out in the present Code, in particular, by publishing and promoting it.

**3. Monitoring**

Upon referral by the Board, the General Assembly, a Committee, the General Secretariat, an individual or legal entity, or at its own initiative, the Ethics and Governance Committee may review cases of proven violations of this Code brought to its attention. It will formulate recommendations to the Association Board, which will decide on the consequences.

**4. Sanctions**

Based on these recommendations and following an adversary proceeding, the Association Board may adopt disciplinary sanctions towards an employee of the General Secretariat or recuse one of its members, one of the members of one of the UCHF Committees, or a member of the General Assembly, for non-respect of the present Code.

**VI. Final provisions**

**1. Hierarchy of standards**

The rules set out in the present Code, in particular, Section V. Implementation, are without prejudice to any complementary or more specific measures defined by the Association's Statutes and Rules of Procedure.

**2. Revision**

Upon proposal from the General Secretariat and following consultation with the Ethics and Governance Committee, the Board may amend or supplement the present Code at any time.

**3. Entry into force**

The present Code of Ethics will enter into force upon its approval by the Association Board and shall be communicated to the General Assembly.