

POLICY AND PROCEDURES MANUAL

VoxUkraine Mission

VoxUkraine is an independent analytical platform founded in 2014, after the Revolution of Dignity, by a team of highly experienced economists and lawyers based in Ukraine and abroad.

“In 2014, many world-class economists wanted to help Ukraine. But it soon became evident that neither the Government nor the Verkhovna Rada needed an expert opinion by Nobel laureates themselves. Then we decided to choose a longer but a fundamental way and increase the level of education and economic debate in Ukraine. Thus, in September of 2014, we launched VoxUkraine.org, a blog for economists,” says Tymofiy Mylovanov, a VoxUkraine co-founder and professor at the University of Pittsburgh.

Today, VoxUkraine engages in a variety of research and economic activities, publishes an online magazine on economics, and develops a number of educational programs. VoxUkraine is not related to any Ukrainian political party or movement in Ukraine or abroad. Our work is not affected by Bbusinessmen, government officials, or politicians have no impact on our work.

Our mission is to raise the level of the economic debate in Ukraine. We believe this will improve the quality of economic decisions in Ukraine and have a positive impact on the welfare of millions of our compatriots. We plan to will achieve this through a quality economic debate, economic policy analysis, independent evaluation of economic reforms, and Ukraine’s integration into the global network of economists and political leaders.

Currently, VoxUkraine focuses on three main areas.

Research: we discover what is really happening in Ukraine. VoxUkraine uses a scientific methods of analysis to make an unbiased assessment of major economic and political processes and decisions in Ukraine. Key projects by the VoxUkraine team include iMoRe, a unique quantitative index evaluating the pace of economic reforms; a periodical publication that rates the efficiency of ministries; DataVox, a project that studies the activity of Verkhovna Rada representatives using statistical mathematical methods and numerical data. VoxUkraine is also in the process of developing VoxCheck, a fact-checking project service and the first publication of its type in modern Ukraine.

Media: we perform a quality analysis of economic processes and the most important developments in and around Ukraine. VoxUkraine creates quality content on economics and relatednear-economic topics. All articles (with rare exceptions) and papers published on VoxUkraine undergo an editorial review process wherein two VoxUkraine editors check the data, facts, and logic of the article. Vox materials are reposted by leading Ukrainian media, including Ukrayinska Pravda, Liga.net, Novoye Vremya, and others, and the world media, including The New York Times, Washington Post, Financial Times and others.

Education: we increase the level of economic knowledge. VoxUkraine conducts educational seminars and lectures on a regular basis.

We try to bring the best world experts to the discussion on around issues important for Ukraine. Since VoxUkraine was founded, more than 300 authors have published articles on our platform, among them Nobel laureate Roger Myerson, head of the London School of Economics Erik Berglof, and others.

VoxUkraine functions according to the principle of an open blog to which anyone can submit an article on Economics and Law. If it passes our review procedure (two independent editors check the quality of the material), it is published.

VoxUkraine is a non-profit organization. Our activity is funded by the donations of hundreds of people concerned with the future of Ukraine, as well as by grants provided by donor organizations. TTF, NED, PACT, US Embassy and Renaissance foundations provided VoxUkraine with substantial support. Funding wasn’t the only kind of support we have received. Dozens of volunteers have helped us to create VoxUkraine through preparing content, organizing events and other activitiesetc.

This Policy and Procedures Manual describes the basic policies of VoxUkraine for administration and operations, editorial process, employment, fundraising and public relations, finance, travel and

procurement. All employees of VoxUkraine are subject to the policies and procedures set forth in this Manual. Each employee is encouraged to consult with the CEO or a project manager for additional information regarding the policies, procedures and benefits described in this Manual. This Manual is not contractual in nature and does not guarantee any continuation of employment or benefits.

VoxUkraine Management and Operational Principles

Legal Entity NGO Voxukraine was founded on 16 November 2015. Current (Jun 2017) organizational structure is shown on the diagram below.

VoxUkraine organizational diagram



The Annual Meeting of VoxUkraine members defines and revises VoxUkraine strategic goals and priorities, approves organizational strategy for the next 3 years, forms governing bodies, approves annual reports of governing bodies. VoxUkraine governing bodies are Editorial Board, Supervisory Board, Finance Committee, Hiring Committee and Executive Board.

Editorial board is responsible for the quality of content published on the blog VoxUkraine.org. Its members define content priorities, review articles, write editorial articles, support development of VoxUkraine. Every article submitted to the publication on VoxUkraine.org is peer reviewed by at least two editorial board members to ensure quality of the argument and to improve the writing. Editorial board reports to the Annual Meeting and currently it consists of 15 members.

Supervisory board makes strategic decisions, including launching new projects, approving the annual budget, etc. It develops the VoxUkraine strategy and presents it at the Annual Meeting for approval. The decisions of the board are made by the simple majority.

Finance committee approves annual budget, budgets of the projects, defines salaries of the editorial office members, approves large payments (>50k UAH). Finance committee is formed by the Annual Meeting for 3 years and reports to the Annual Meeting.

Hiring Committee makes decisions of hiring and dismissal of the Editorial Office members - finance officer, project managers, project and office staff. Hiring committee is formed by the Annual Meeting for 3 years and reports to the Annual Meeting.

Executive Board maintains operational activity and management of the Editorial Office. Executive Board is formed by the Annual Meeting for 2 years and reports to the Annual Meeting.

Editorial Office manages and implements VoxUkraine projects, maintains VoxUkraine.org blog. Finance officer prepares annual budget for approval of Finance committee.

Advisory Board provides strategic advice and oversees ethical issues.

Recruitment and HR Policy

VoxUkraine has founded a hiring committee (HC) to manage HR direction. HC consists of 6 members which are elected at the General Meeting.

HIRING PROCESS

1) HC is fully responsible for hiring of senior full-time staff, including CEO, CFO and project managers.

2) Seniors (CEO, CFO and project managers) are responsible for hiring middle and low-level staff, such as analysts for particular projects, assistants, researchers, accountants etc. A senior can and is encouraged to seek advice from HC committee if she/he hesitates when choosing among candidates or if he/she cannot properly assess knowledge and skills of a candidate.

3) All hiring is based on open competition with job announcement posted in media. Two EB members, one of them from HC, are to sign off a job announcement

4) An offer to a selected candidate is to be approved by HC before being sent to the candidate. The offer must include job description, specific responsibilities, KPIs and compensation range.

5) If a candidate is strong and potentially eligible for compensation exceeding the specified range, this should be approved by HC.

6) All newly hired employees are subject to 3-months trial. Following the trial, a senior assesses the work of an employee and makes a recommendation to HC in written form whether to keep the employee or not. HC is to make a decision.

7) Job descriptions for each employee are fixed in the corresponding contracts in accordance with the local legal requirements.

8) Employees. VoxUkraine employees can be officially employed, working on the basis of a labour contract and implementing their activities full-time under the civil contracts signed with VoxUkraine. Full-time employees are expected to work 40 hours per five- day week.

9) Independent Contractors/Consultants. Independent contractors / consultants sign formal agreements with VoxUkraine to assist in developing as well as implementing specific projects of a limited duration. Extension of a consultancy contract for any reason does not constitute a change in the consultant's employment status. Independent contractors rely on their own expertise and resources and work independently with broad oversight from VoxUkraine.

10) Interns and Trainees. Students and other individuals may from time to time work for VoxUkraine to gain office and program experience. All interns and trainees sign agreements stipulating their rights and responsibilities while working at VoxUkraine. Depending on financial resources and contract specifications, they may receive compensation.

11) VoxUkraine Editorial office members and employees should not be members of any parties. During the interview stage candidates are asked about their political past of present and those, who are involved into political activities in formal (as members of parties) or informal way, as well as advocacies, should not be hired.

COMPENSATION

1) CEO (Borys Davydenko at the moment) together with CFO (Anna Karplyuk at the moment) is to design compensation ranges for employees of different levels. Finance Committee checks and approves the amounts of compensation. CEO and CFO are to make sure that all employees of the same level receive compensation within the respective range.

2) Compensation level is confidential information and is prohibited from being disclosed by full-time or part-time employees.

3) Independent Contractors' compensations (such as translators, IT specialists etc.) can be calculated based on the timesheets that have to be submitted in electronic form on a monthly basis and should include the period from the 26th date of a previous month to the 25th date of a month when a compensation payment is performed. The timesheets have to be collected on the 26th date of a month of payment as the latest. Accurately recording time of service rendering / number of symbols (for translators) / problems solved (for IT specialists) is the responsibility of the staff. Time-keeping database is available from CFO. It is the employee's responsibility to complete his or her time sheet, which is provided to CFO, on a monthly basis. The supervisor will review and approve the timesheet before submitting it to the CFO.

HUMAN RESOURCES AND CAPACITY DEVELOPMENT

VoxUkraine recognizes that the skills and knowledge of its staff are critical to the success of the organization. Staff is encouraged to improve their professional qualifications and skills. VoxUkraine provides time off for employees to attend work related conferences and training sessions. Payment or reimbursement for training and development expenses requires advance approval from CEO. Employees may be requested to make a presentation to other staff members upon completing the conference or training session.

Procurement Policy

1. purchases are processed in accordance with the requirements fixed at the corresponding grant agreements and following passing the respective approval chain.
2. Where appropriate, particularly for items that cost more than UAH 50,000, an analysis must be made of lease and purchase alternatives to determine which type of procurement would be the most economical and practical. The purchases for the amount over UAH 50,000 are a subject to review and approval of the Financial Committee.
3. Tender procedure can be applied for large purchases if required by a donor's guidelines.
4. Price analysis may be accomplished by obtaining verbal quotations by telephone, conducting web searches, comparing catalogue prices, comparing advertised specials, and inviting written bids.
5. The purchaser must write a brief description of the product or service, the preferred brand and model number, quantity, the name and address of the vendor, and the account to which the purchase is to be charged. All the necessary documentation still needs to be obtained and delivered to the Finance Department by the purchaser.
6. The requisitions are given to CFO, who confirms the price with the vendor, documents delivery and other pertinent information, places the order and requests an invoice from the vendor. The received invoice should be sent by email to the accountant with the corresponding payment request, describing a subject to be paid and a source of the payment. Each payment has to be approved by a respective person - a CEO (B.Davydenko at the moment) or a respective member of a Finance Committee (N. Shapoval at the moment).
7. The payment can be provided based on the invoice received by fax/email. The original copy of the invoice should be submitted to the accountant by the end of a month when such a payment was processed.

Fundraising Policy

VoxUkraine raises funds from donors and private individuals only for goals registered in the Charter and only for goals that do not contradict VoxUkraine's mission.

Limitations. Vox Ukraine aims at diversifying its fundraising sources.

- Funding from a single entity or the size of a single grant should not be greater than 33% of organization's annual budget. Funding from a single private individual should not be greater than 10% of organization's annual budget.
- Deviations are permitted subject to the decision of the Financial Committee. Status quo must be restored no later than in two years.

Rules for raising funds.

VoxUkraine uses the following fundraising sources:

- Donor grants. VoxUkraine raises project-aimed and institutional funds from donor organizations if funding conditions and potential projects help to implement VoxUkraine's mission, which is to raise the level of economic discussion in Ukraine.
- The majority of financial committee members must approve the grant application submission
- VoxUkraine rejects or returns funds to donors (including those raised from both entities and private individuals) if such decision is made by the majority of financial committee members.
- If donor (private individual or entity), who financially supported VoxUkraine did not state the preference for anonymity, his name (or name of the entity) would be stated in the VoxUkraine's annual financial report.
- If donor stated the preference for anonymity or did not want to reveal the amount of money donated, VoxUkraine would not disclose such information.

Donors and editorial policy

- No donor shall intervene in the VoxUkraine editorial policy or influence VoxUkraine content in any way.
- If donor tries to influence VoxUkraine content or its other activities, members of Editorial Board must be notified.
- If the majority of editorial board members think that a donor has an undue influence on the editorial process, any member of editorial board or management of VoxUkraine, they shall consult Ethical Committee, who would make a decision on this matter.

Budgeting Policy and Reporting Procedure

FINANCIAL RESPONSIBILITIES

It is the responsibility of the Governing Board to formulate financial policies and review operations and activities on a periodic basis.

The Board delegates this oversight responsibility to the Finance Committee. This responsibility is shared through delegation with VoxUkraine CEO and CFO, who acts as the agent, implementing all financial policies and procedures.

CEO, with oversight of The Finance Committee is responsible for coordination of the following:

- approving revenue and expenditure objectives in accordance with the Board approved long-term plans,
- selection of the outside auditors,

CFO, with oversight by the Finance Committee has the day-to-day operations responsibility for:

- financial planning for the organization,
- assistance in budgeting for new projects,
- assistance in applications for grants and development of new projects,
- working with the Board and CEO on VoxUkraine financial model,
- financial reporting: internally on the quarterly basis and to the donors as needed,
- contract management: development and analysis of contracts with donors, contracts with employees, development of compensation schemes,
- work with the legal documents of the NGO VoxUkraine: organization of Board meetings, preparation of protocols, checking compliance of organization activities with Statutory requirements,
- coordination of work of the accountant,
- keeping databases and registers of legal and financial information,

- ensuring the accuracy of the accounting records, internal controls, financial objectives and policies,
- bank reconciliation review,
- annual budget presentation,
- management of the received funding.

The accountant is directly supervised by CFO and is responsible for the reporting formats, accounts payable processing, Payroll input and Payroll processing, cash receipts input, journal entries for General Ledger in accordance with the local Chart of Accounts, as well as bank reconciliations.

BUDGETING PROCESS VoxUkraine CFO shall be responsible for presenting to the Finance Committee and other Board Committees an annual operating budget draft sixty (60) days prior to the end of the fiscal year and thirty (30) days prior to its submission to the Governing Board. The Finance Committee shall review and approve the recommended fiscal year budget revenues, expenditures and cash flow, and submit it for approval to the Governing Board. The budget shall contain revenues and expenses forecasted by month. A chart describing monthly cash flow shall be included.

The entire Board must approve the budget. In accordance with p. 4.29 of the NGO's Charter, a decision of the governing bodies on issues related to their competence may be approved by the method of questioning without actually convening meetings. The decision taken by the survey method has the legal force of the decision of the relevant governing body.

A fund of one-quarter to one-third of the NGO's annual operating expenses shall be maintained. When the fund balance falls below this minimum, the Finance Committee and the Board shall develop a fundraising plan for rebuilding it.

AUDIT VoxUkraine will have an audit of its financial statements annually. The audit shall be completed by a firm of Independent Certified Public Accountants. The NGO CEO and CFO shall have direct responsibility in overseeing the implementation of the Annual Financial Audit.

VoxUkraine CEO and CFO shall recommend to the Finance Committee for approval, the selection of a firm to perform the annual audit. In addition, the Finance Committee shall assist when necessary in the audit preparation, and report the final results to the Governing Board. A representative of the audit firm shall be invited to attend the annual presentation to the Finance Committee, and shall be required to make a presentation to the Board if the audit report is other than unqualified, or if the auditors report material weaknesses in internal controls or reportable conditions.

EXPENDITURES PROCEDURES All expenditures shall be approved by VoxUkraine CEO or a responsible member of the Finance Committee. A funding source shall be pointed for each expense prior a payment processing.

Invoices shall be approved by either the NGO's CEO or a responsible member of the Finance Committee. The paid invoices shall be filed and kept in accordance with the local legal regulations rules and the respective donor's requirements.

COMPENSATION AND PAYROLL The compensation level for the staff members shall be determined by the Governing Board and is based on a board-approved process. No staff member of the NGO may be compensated outside of the approved range, without the approval of the Governing Board.

Monthly payroll expenses with the corresponding specification shall be provided to the accountant from CFO's side on a monthly basis (by the 30th date of a month) with pointing the details as follow:

- a list of staff members to be paid in a current month,
- the compensation rate for each staff member,

- the additional amounts (reimbursements, overtimes, etc.) to be paid, with the corresponding comments / calculations,
- a calculation of the corresponding taxes,
- pointing of a funding source for each amount to be paid with the corresponding distribution.

Money transfers will be provided to each staff member by the accountant. The consolidated monthly payroll shall be approved by either the NGO's CEO or a responsible member of the Finance Committee prior to the payment processing.

BANK RECONCILIATIONS Bank reconciliations shall be completed monthly by the accountant and cross-referenced with the cash and receipts logs. The actual data from the bank statement for a month that is closing shall be added to the corresponding Cash Flow projection by CFO. The Statements shall be then reviewed by the VoxUkraine CEO and presented to the Finance Committee.

8. **CONFIDENTIALITY AND RECORDS SECURITY** Financial records are restricted materials with limited access. Only CEO, members of the Finance Committee, CFO, and accountant (or others so authorized) shall have access to financial records (vendor files, checks, journals, payroll, etc.).

Policy for content quality

I Procedures of Peer review and quality control

The quality of our articles is one of the main values of VoxUkraine. To reach the best quality, we always follow these practices.

1. Each article must meet our standards that are published on our site in the section "To authors"
2. All articles must pass the peer review process. It means that an article can only be published after two members of the Editorial Board have signed edited it.
 - Each article is submitted to voxukraine@gmail.com and is randomly received by one of the receiving editors (two people based in the West)
 - The receiving editor assigns an article to one of the managing editors (a member of the editorial board)
 - The managing editor decides whether to reject, accept or ask to revise the article
 - The managing editor may seek comments of independent referees
 - After the managing editor accepts the article, another editor who has not participated in the revision is required to confirm the acceptance
 - In exceptional cases, VoxUkraine may publish articles that did not pass the review process, in which case this is explicitly indicated
 - The managing editors or authors do NOT determine the media outlet to which VoxUkraine might choose to submit the article
 - Normally, authors' affiliations are provided with the articles
3. ME chooses reviewers based on the expertise of the editors. If no member of the Editorial Board has an appropriate expertise, the ME may ask outside experts to review the submission. While doing this, ME ensures the absence of the conflict of interest of an external reviewer.
4. Each long term project (VoxCheck, VoxConnector, iMoRre) must have its own editorial board, which provides control of quality and intellectual support
5. An article content can be corrected after publication if there was a factual mistake found and double-checked by the editorial board of VoxUkraine or project boards. A correction must be highlighted and easily seen by the readers.

II Quality of editorial articles

1. Editorial articles are the result of collective work of the Editorial Board
2. Only members of the Editorial Board can propose a theme and write an editorial article
3. Editorial article may be published only after all members of the Editorial Board signed off this article

Policies to Mitigate Conflicts of Interest

- • Every publication under review is available for comments to every Editorial Board member
- • Editors do not handle topics in the immediate area of the conflict of interest

(e.g. T.Mylovanov, O. Zholud and I.Sologoub do not participate in reviewing any content related to the NBU)

- • All editors and board members are required to disclose any potential conflict of interest
- • All complaints are investigated
- • Editorial Board does not receive funding from VoxUkraine.
- • The identities of the managing editors are concealed from funders and the public
- • No funding from donors is received under any conditions on editorial policies
- • Each article contains a disclaimer that describes possible conflict of interest or absence of such

Policies to Minimize Pressure on Authors

VoxUkraine front editors (e.g., people with public profiles) aggressively defend authors and protect them for any pressure, public and private, after the publication

- VoxUkraine informally tracks concerns about authors and phases out interaction with authors with suspicious reputation. At the same time VoxUkraine offers a chance to publish to everyone, regardless of their position.
- Diversity of opinion is an important objective for VoxUkraine. Sometimes, in the interest of diversity, VoxUkraine can choose to publish an article that does not pass the editorial standards, in which case VoxUkraine publishes the appropriate disclaimer
- VoxUkraine requires authors to disclose any potential conflicts of interest
- There is no way for donors to get in touch with authors or editors through VoxUkraine
- VoxUkraine research projects are conducted under a methodology that is developed before the results of research is known. That is, VoxUkraine does not change the methodology if the editorial board disagrees with the results of the research (e.g., on quality grounds). However, VoxUkraine can choose to adjust methodology for future projects in response to critique and feedback

Communication Policy

The purpose of VoxUkraine Communication Policy is to share our values with Ukrainian and international community. We are constantly working to control and improve communications of the platform in an effective way.

We believe in the free flow of information. Therefore we use a Creative Commons Attribution NoDerivatives license, so anyone can republish our articles for free, online or in print. We have only two conditions:

- one can republish our article only entirely, without any changes;
- publication must include a reference to the original source (VoxUkraine).

If some media needs to use our content in a different way, it should first receive our consent.

Media contact is limited to the Editor-In-Chief, Editorial Board members, Strategic Communications Advisor, Social & Community Editor, and project managers. No other employee is authorized to make press statements (without permission of Editor-in-Chief or Project Leaders) .

Employees who are approached with questions should record the inquirer's name, company, and phone number and inform the inquirer that an appropriate representative from VoxUkraine will contact them. Following such contact, the employee should immediately provide the Editor-In-Chief, Social & Community Editor or one of the Editorial Board members with such information.

For media, VoxUkraine provides an opportunity to get comments from authors of articles and researches published in the blog. Important organizational issues are covered in open letters which are published on our site, social media resources and send by e-mail to the bigger Ukrainian media.

Public communications of the analytical platform are provided through such channels:

- blog
- weekly newsletters
- accounts in the social networks (Facebook, Twitter, Telegram, YouTube)
- personal conversation.

Travel Policy

Only trips that are related to defined projects and work at VoxUkraine are eligible. Business trip on behalf of VoxUkraine is only eligible after Director's permission.

Employees should provide detailed information about their trip to CFO, providing full contact and schedule information.

Since we are a non-partisan and non-profit organization, we should always be cautious with the costs. When it comes to travelling, Economy Class or equivalent should be chosen; we also adopt a similar approach with the regards to hotel costs and other expenses.

The person submitting reimbursement claims is responsible for their correctness.

In case a person is rendering services to VoxUkraine based on a civil contract, his/her travel expenses can be reimbursed in a payment at the end of a month, when such expenses were carried, in case of delivery of the respective supporting documents to CFO and receiving the approvals for the reimbursement from CEO and Finance Committee members. Employees are responsible for coordinating booking of their tickets with CFO well in advance to assure low prices.

VoxUkraine only reimburses actual and reasonable single occupancy accommodation costs (i.e. standard room in a three-star hotel). Any stay over the length of the business trip (plus an extra night before and at the end of the trip) will be charged to employees or deducted from their service fees.

Vox in its discretion may amend, suspend, or terminate the provisions of this Manual, in whole or in part, at any time, retroactively or otherwise, with or without notice. The Director or his designee is responsible for implementing the policies and procedures set forth in this Manual. Director approves significant revisions to the policies and procedures with Editorial Board.