



Media Outlet  
 Legal Entity  
 Date of first publication  
 Date of Latest Change

**Poltavska Khvyliia**

**7/27/23**  
**7/27/23**



**The following is our Transparency Report as participants in the Journalism Trust Initiative (JTI).** It is automatically generated and based on a questionnaire provided by the JTI. The answers you see here have been given by us to our best knowledge. They have NOT been reviewed or independently audited by a third party yet. JTI is a normative, machine-readable and certifiable list of criteria for trustworthy journalism, which was initiated by Reporters Without Borders (RSF) and published by the European Committee for Standardization (CEN) in December 2019. The publication of the original CEN Workshop agreement no. 17493 can be accessed **here**. More information on the JTI can be found **here** online.

<https://www.jti-app.com/report/My1Dn8LdP3LNa9oq>

# TRANSPARENCY REPORT

## SECTION A: IDENTITY AND TRANSPARENCY

Basic Requirements on Media's Identity

Editorial Mission

Public Service Media

Disclosure of Type of Ownership

Requirements on Owners' Identity

Disclosure of Identity of the Management Team and its Location

Disclosure of Editorial Contact Details

Disclosure of Revenue Sources and Data Collection

## SECTION B: PROFESSIONALISM AND ACCOUNTABILITY

Accountability for Journalism Principles

Accuracy

Responsibility for Content Provided by the General Public

Responsibility for Sources

Professionalism for Affiliations

Internal Accountability

External Accountability

Professionalism in the Media Outlet

Training

Publication of Self-Assessment





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Date of first publication  
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# 1. BASIC REQUIREMENTS ON MEDIA'S IDENTITY

## 1.1 LEGAL ENTITY NAME

The Media Outlet, as Conforming Entity, shall provide the name designating the Legal Entity or entities under which it is conducting business. In some cases, this will be the company or public entity (branch of government, parliament, legally authorised state institution, etc.) that has ultimate legal ownership of the Media Outlet. This usually is the body that would be held liable in a court case. It is the body that enters into transactions such as paying employees and suppliers or receiving funds from readers, viewers, customers, advertisers and other sources of funding.

### What is the Legal Entity Name?

Ulybin Vitaly Anatoliyovych

## 1.2 CONTACT DETAILS AND IDENTIFIERS

The contact details that shall be provided are the postal address and both a general telephone number and email address for the Legal Entity or entities designated in clause 1.1 "Legal Entity Name", as well as existing identifiers. *Clarification: This should be the contact details for the Legal Entity. Elsewhere in this document, means of contact for reader, viewer or listener enquiries, editorial input and other purposes are required.*

### What is the postal address for the Legal Entity?

Teatral'na St 4/6  
apartment 59  
36003 Poltava

### What is the general telephone number for the Legal Entity?

+380 97 801 8018

### What is the email address for the Legal Entity?

info@poltavawave.com.ua

### Is the Legal Entity required to have a Tax ID, a Registration ID, a DUNS number and/or other identifiers?

Yes

### What are these IDs for the Legal Entity?

3300714834

### Are there any other governmental or other identifiers that a certification body could use to verify the identity of the Legal Entity?

Yes

### What are those identifiers?

Youcontrol/Opendatabot

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### 1.3 DESCRIPTION OF MEDIA OUTLET

The Conforming Entity shall list all brand names, titles, publication names, etc. under which its Content is published, broadcast, printed or otherwise disseminated to the public or customers. These will be known for this document and this process collectively as the Media Outlet. It is that Media Outlet that will conform with this Journalism Trust Initiative Standard. This is the Conforming Entity. These include all names used on website URLs and on social media accounts, etc.

#### What Brand Name(s), titles, publication names, etc. do you use to publish Content?

Poltava Wave

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### 1.4 DISTRIBUTION CHANNELS AND URLS

The Media Outlet shall list all URLs on which it publishes. If broadcast or audiovisual, the Media Outlet shall list all terrestrial frequencies, satellite, cable, streaming and other platforms on which it is distributed.

#### Does the Media Outlet publish on any URLs?

Yes

#### 8.a On what URLs do you publish?

<https://poltavawave.com.ua/>

#### Does the Media Outlet publish any content on any social media?

Yes

#### 9.a What are the social media URLs, handles, addresses or names that you use to publish?

<https://t.me/poltavawave>

<https://www.facebook.com/poltavaswavenews>

<https://www.youtube.com/channel/UCHGZaJWGZxYbjElqCfBOhpA>

<https://www.instagram.com/poltavaswavenews/>

#### Does the Media Outlet publish any content by broadcasting and/or streaming?

No

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### 1.5 SAFETY CONCERNS

The Media Outlet shall at all times keep the safety (including digital safety and cybersecurity) of staff, contributors and owners as a primary concern. If full transparency of contact details or other information might endanger individuals, the Media Outlet shall describe what it can about the legitimate reasons for a lack of disclosure or use of pseudonyms for that purpose. Safety concerns shall not be misused to refrain from disclosure.

#### Do the Media Outlet's Editorial Guidelines state that the safety of all journalists shall be treated as a primary concern?

Yes

#### If you want to publish additional information, please provide it here.

Unanswered

#### Are there any reasons that the Media Outlet has for withholding information on any of the questions as part of this JTI Standard process?

No

#### What are the reasons?

Unanswered

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## 1.6 LOCATION

The Media Outlet shall provide the physical address of the headquarters of the legal entity referred to above in 1.1 Legal Entity Name. *Clarification: This is necessary in cases where the address listed in the Contact Details clause (1.2) does not specify a physical location, or where the location designated by the contact details referred to in 1.2 is not the same location as the headquarters. Clause 1.5, Safety Concerns, may be applied.*

**Is the physical address of the Legal Entity different from the postal address according to question no. 2?**

No

**Do you have a safety-related reason for not providing it?**

No

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## 1.7 FOUNDING DATE

The founding date of the Legal Entity referred to in clause 1.1 "Legal Entity Name" shall be specified. If the Media Outlet designated in clause 1.3 "Media Outlet" has a different founding date, the history of former legal entities and their founding dates shall be listed.

**What is the founding date of the Legal Entity?**

January/2020

**If you want to publish additional information on the founding history, please provide it here.**

Unanswered

**Is the founding date of the Media Outlet (as in clause 1.3. question no. 7) different from that of the Legal Entity (as in clause 1.1. question no. 1)?**

No



Media Outlet  
 Legal Entity  
 Date of first publication  
 Date of Latest Change

**Poltavska Khvyliia**  
**7/27/23**  
**7/27/23**

## 2. EDITORIAL MISSION

### 2.1 EDITORIAL MISSION STATEMENT

The Media Outlet shall disclose its editorial mission statement which shall be consistent with the fundamental ethical principles of trustworthy journalism, and, as described in the Preamble, should incorporate principles of: ethical practice, good governance, self-regulation and Engagement with the public. A Media Outlet shall set out how it proposes to uphold these journalism principles through its Editorial Guidelines and processes which shall include arrangements in relation to internal accountability and of appropriate external accountability (see clauses 9 – 15). Best practice is to have these arrangements codified and made available publicly.

**Does your Media Outlet have an editorial mission statement, or stated set of principles or editorial values?**

Yes

**Provide that statement here.**

We, the "Poltava Wave" team, defend the fundamental principles of journalism and journalistic ethics. In our work, we are guided exclusively by the principles of impartiality of conflicts, objective presentation of information and fact-checking, serving public interests, justice and inviolability of private life.

We recognize the need to provide news promptly, but in conflict situations we will give priority to quality material preparation. We reserve the right to refuse advertising that violates our ethical and editorial principles. "Poltava Wave" is a collective of journalists, media workers and editors united by the common idea of returning a socially oriented face to journalism and reviving the level of people's trust in the profession and the means of mass communication in general.

Every day we inform you about the news of Poltava and the settlements of the region, create interesting videos and infographics, conduct journalistic investigations, interview leaders of public opinion and give an opportunity to everyone who has important information and wants to share it.

**Is that statement posted online?**

Yes

**What is the URL where it is published?**

<https://poltavawave.com.ua/about>



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

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**7/27/23**  
**7/27/23**

---

## 3. PUBLIC SERVICE MEDIA

### 3.1 PUBLIC SERVICE MEDIA MISSION, GOVERNANCE AND INDEPENDENCE

The Media Outlet shall describe its public service mission and the legal instrument on which it is based. It shall describe its governance structure, including the role of all relevant governance bodies or organisations (for example, regulator, supervisory board, government/parliament role). It shall state how its financial income is generated and what proportion of its financial resources are totally or partially provided by public funds. It shall state if both external and internal governance measures guarantee its editorial independence.

#### Is the Media Outlet a Public Service Media?

No



Media Outlet  
 Legal Entity  
 Date of first publication  
 Date of Latest Change

**Poltavska Khvyliia**  
 7/27/23  
 7/27/23

## 4. DISCLOSURE OF TYPE OF OWNERSHIP

### 4.1 PRIVATELY HELD

The Media Outlet shall declare its legal status clarifying what type of company it is registered as. For example, if it is a limited or incorporated company. It should use the legal definition used in its country of registration and provide the relevant registration information.

**Is the Media Outlet or the Legal Entity privately owned?**

Yes

**What is the form and status of the Media Outlet or Legal Entity according to the legal definition in the country of registration?**

Poltava Wave is registered as an individual entrepreneur. At the same time, we also have a separate structural unit - the Public Organization "Institute for the Development and Protection of Democracy," which manages projects and grant programs.

### 4.2 STATE OR PUBLICLY OWNED

The Media Outlet shall state clearly if it is fully or partly owned by the government, a state institution, or other public body, providing information on the specific department, entity, or body that exercises that ownership and its relationship with the government.

**Is the Media Outlet or the Legal Entity owned by the state, a unit of the government or any other public entity?**

No

### 4.3 PUBLICLY TRADED COMPANY

The Media Outlet shall indicate if it is a publicly traded company and where it is legally registered and where its shares are traded. The company shall also provide its share name and indicate what proportion of its ownership is publicly traded.

**Is the Media Outlet or the Legal Entity publicly traded?**

No

### 4.4 OTHER

If the ownership of the Media Outlet is different from the above, for example if the organisation is a co-operative or member-owned, the Media Outlet shall indicate its form of ownership and provide links to local legal definitions of the type of ownership. If the ownership of the Media Outlet is made up of a combination of the above types of ownership, then it shall provide a breakdown of the ownership indicating clearly which share is which ownership type.

**Is the ownership of the Media Outlet or the Legal Entity different from the three previous clauses in this section? For example, is it a co-operative or member-owned?**

No





Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**  
**7/27/23**  
**7/27/23**

## 5. REQUIREMENTS ON OWNERS' IDENTITY

### 5.1 NAMES OF OWNERS AND BOARD MEMBERS

The names of direct, indirect, controlling or beneficial owners shall be disclosed. If any of these is also the beneficial owner of another company, the name and main activities of that company shall be clearly stated. The business sectors in which these other companies are operating shall also be indicated. The names of the members of supervisory structures, like the board, shall also be disclosed. If any of these persons is an active member of a political party or movement, holder of an elected office, or a candidate to a political election, the name of that party or movement shall be clearly stated.

#### **What are the names of all direct, indirect or beneficial owners?**

Vitaliy Anatoliyovych Ulybin, an individual entrepreneur who manages these projects, was registered in February 2022. Before that, we managed projects without official registration because this was not required by law.

#### **Are the names of the owners in the previous question available online?**

Yes

#### **What is the URL that contains the names of the owners, or, if not available online, please indicate where that information can be obtained?**

<https://poltavawave.com.ua/about>

#### **What are the names of the members of supervisory boards?**

Kateryna Tkachenko, Vitaly Ulybin, Roman Pavlyuk, Valery Lytvyn, Stanislav Panteley, Egor Rud, Victoria Miroshnichenko, Bohdan Globa

#### **Are the names of the members of the supervisory board members in the previous question available online?**

No

#### **Are the listed owners also founders or owners of other companies?**

Yes

#### **State here the names and main activities of those companies.**

Sil Media, online media, <https://sil.media/>

#### **What are the business sectors for the companies listed in the previous question?**

Media and Information sector

#### **Are any of the owners active members of a political party or movement or candidates in a political election or current office holders?**

No

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## 5.2 CONTACT DETAILS OF DIRECT AND INDIRECT OWNERS

The contact details of direct and indirect owners shall be disclosed, preferably online, along with the contact details of the members of the board of directors.

### What is the contact information for all direct and indirect owners?

Vitaly Anatoliyovych Ulybin (chairman of the board, editor-in-chief, founder) - +380660671520, poltavawave@proton.me, editor@sil.media

### Is the contact information in the previous question available online?

Yes

### What is the URL with the contact information from the previous question?

<https://poltavawave.com.ua/authors>

### What is the contact information for the members of the board of directors?

Vitaly Anatoliyovych Ulybin (chairman of the board, editor-in-chief, founder) - +380660671520, poltavawave@proton.me, editor@sil.media

### Is the contact information in the previous question available online?

Yes

### What is the URL with the contact information from the previous question?

<https://poltavawave.com.ua/authors>

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## 5.3 NAMES OF SHAREHOLDERS

The names of direct and beneficial majority or controlling shareholders shall be disclosed. If the shareholder is a company, the name and main activities of that company shall be clearly stated. The business sector in which this company is operating shall also be indicated.

### What are the names of the direct, majority or controlling shareholders? (If shareholders are companies, list the main activity and business sector of that company along with the name.)

N/A

### If you want to publish additional information, please provide it here.

Unanswered

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## 5.4 PERCENTAGE OF SHAREHOLDINGS

The percentage of the controlling shareholdings should be disclosed, regardless of the percentage.

### List the shareholders and the percentage of the holdings.

N/A

### If you want to publish additional information, please provide it here.

Unanswered

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## 5.5 EXCEPTION FOR MEMBER-OWNED MEDIA OUTLETS

The names and contact information for all owners is not required to be disclosed, but it is required for the leadership, e. g. the Board of Directors according to clauses 5.1 and 5.2.

### Is the Media Outlet member-owned?

No



Media Outlet  
 Legal Entity  
 Date of first publication  
 Date of Latest Change

**Poltavska Khvyliia**

**7/27/23**  
**7/27/23**

## 6. DISCLOSURE OF IDENTITY OF THE MANAGEMENT TEAM AND ITS LOCATION

### 6.1 MANAGEMENT DIRECTORY

Chief executive officer, managing director, directors, all the people holding responsibility in the company shall clearly be identified. Their name, position and professional contact details shall be disclosed.

#### **What are the names, positions, and contact details of all members of management for the Media Outlet?**

Vitaly Ulybin, Editor in Chief, editor@sil.media  
 Kateryna Tkachenko, Editor, tkachenko@sil.media

#### **If you want to publish additional information, please provide it here.**

Unanswered

### 6.2 LOCATION OF BRANCHES AND OFFICES

The location of the headquarters, main branches and offices of the Media Outlet shall be disclosed, including the full address, a contact phone number and email address.

#### **What is the physical address, phone number and email address of the headquarters of the Media Outlet?**

Vitaly Ulybin, Editor in Chief, editor@sil.media  
 Kateryna Tkachenko, Editor, tkachenko@sil.media

#### **Does the Media Outlet have other main branches and offices?**

No

#### **Do you have a safety-related reason for not providing it?**

No



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**  
**7/27/23**  
**7/27/23**

## 7. DISCLOSURE OF EDITORIAL CONTACT DETAILS

### 7.1 SOCIAL MEDIA

The Media Outlet shall provide the contact details of the professional social media accounts of those responsible for interacting with and responding to public queries about the organisation's editorial content. This can be management, senior editorial staff, the ombudsperson, readers editor or equivalent.

**Does the Media Outlet have social media accounts for the public to use to make queries or respond to Content?**

Yes

**What are the URLs or other identification of all social media accounts used by members of the public to contact the Media Outlet?**

<https://t.me/poltavawave>  
<https://www.facebook.com/poltavaswavenews>  
<https://www.youtube.com/channel/UCHGZaJWVGZxYbjElqCfBOhpA>  
<https://www.instagram.com/poltavaswavenews/>

### 7.2 NEWSROOM CONTACT DETAILS

The Media Outlet shall provide public contact details that will facilitate communication with the newsroom(s). The editorial staff, when informed of the public's queries, should be able to communicate back to the public.

**Does the Media Outlet have a person responsible for dealing with communication from the public regarding the Content?**

Yes

**Is the method for contacting that person or others at the Media Outlet clearly visible to the public?**

Yes

**In what ways does the staff of the Media Outlet responsible for the Content communicate back to the public results of queries, concerns, etc.?**

We are open to communication with readers and viewers. On the website, the profile of each author contains a personal email address, as well as links to social networks. We are also currently working on creating a followers club. Within this club, we plan not only to provide exclusive materials but also to hold open meetings with readers and viewers to get to know each other better and better understand the needs of our audience.

### 7.3 CUSTOMER SERVICE CONTACT DETAILS

The Media Outlet shall provide all available contact details: telephone numbers, email addresses, and correspondence address of its customer service. If the organisation does not have a department, a contact should be provided for readers or other stakeholders to be able to get in touch with the Media Outlet.

**Does the Media Outlet have a department or a single person who is responsible for customer service?**

No



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**  
**7/27/23**  
**7/27/23**

## 8. DISCLOSURE OF REVENUE SOURCES AND DATA COLLECTION

### 8.1 SOURCES OF REVENUE

The Media Outlet shall disclose a list of its sources of revenue, ranked from largest to smallest. These may include subscriptions, advertising, major donors and donations, subsidies, fees, sales, memberships, sponsorships, events, etc. Organisations obliged to publish or make public their financial information shall provide a reference to the source where the data is accessible. The Media Outlet may disclose its revenue and/or the categories of its sources of revenue, including the respective ratios. A Media Outlet owned by the state or the government, or financed with public money, shall disclose the nature of its source(s) of revenue: license fees, government budget, partnerships, public subscriptions, grants, commercial advertising, or other. Where a media entity deems itself precluded from disclosure of information due to safety and security concerns as outlined in the Terms and Definitions section, these shall be explained.

**What are the categories of sources of revenue for the Media Outlet, ranked from largest to smallest? These may include subscriptions, advertising, major donors, donations, subsidies, fees, sales, memberships, sponsorships, events, etc.**

If we talk about the current state of affairs (i.e., after the full-scale invasion of Ukraine), the largest category of income is currently partners and donor organizations (such as the Prague Civil Society Center (Czech Republic), the People in Need Charity Fund (Czech Republic), the German Marshall Fund, Institute of Mass Information (Ukraine). In second place is income from commercial advertising, which we are slowly but managing to recover. We are also currently developing a closed membership club with access to exclusive materials for subscribers.

**Is the Media Outlet required to make financial disclosures?**

No

**What is the revenue of the Media Outlet?**

Unanswered

**What is the ratio of the categories of revenue sources (as in question no. 46)?**

The largest category of income is partners and donor organizations (such as the "Prague Center for Civil Society" (Czech Republic), the Charitable Foundation "People in Need" (Czech Republic), the German Marshall Fund, and the Institute of Mass Information (Ukraine). Also in second place is income from commercial advertising, which we are quite slowly managing to recover. Currently, we are also engaged in the development of a closed membership club with access to exclusive materials for subscribers.

**Is there any reason for safety and security that you have given incomplete data in this section?**

No

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## 8.2 DATA COLLECTION DISCLOSURE

Where a Media Outlet processes personal data from its audiences, on its own or by engaging with third parties, that shall be disclosed. The Media Outlet shall describe what personal data is processed, by which methods and for what purpose.

### **Does your Media Outlet process any personal information from online visitors on its own or with third parties?**

Yes

### **What information is processed?**

By using the "Poltava Wave" website, the visitor gives his consent to the processing of his personal data, such as:

age  
sex  
region of residence  
the device from which you are visiting the site  
your browser type  
operating system type  
data about visited pages, viewed information  
time spent on the site  
other statistical data

### **What is the purpose for gathering that information?**

We collect cookies in order to measure and define a general profile of our audience, which is primarily geographical and demographic, as well as the areas of interest of our readers and viewers. We need it in order to respond to challenges and create interesting and useful content for our readers and viewers.

### **By what methods is the information processed?**

This is information collected by the Google Analytics website about the demographics of readers.



Media Outlet  
 Legal Entity  
 Date of first publication  
 Date of Latest Change

**Poltavska Khvyliia**  
 7/27/23  
 7/27/23

## 9. ACCOUNTABILITY FOR JOURNALISM PRINCIPLES

### 9.1 EDITORIAL GUIDELINES

A Media Outlet shall produce a set of Editorial Guidelines or adhere to an external set of guidelines (for example the Model Editorial Guidelines provided as a reference document to this Standard), to which its journalistic operations comply. They should govern meaningful principles of journalistic content, dissemination and conduct. These guidelines, and the identity of the person or group of persons with ultimate responsibility for them within its organisation, shall be made available to the public in a readily accessible and understandable form. Best practice is to have these guidelines available publicly rather than on request.

**Does your Media Outlet have a set of guidelines, or adhere to an external set of guidelines, for journalistic content, distribution and conduct to which its journalistic operations comply?**

Yes

**Are they made available to the public in a readily accessible form?**

Yes

**What is the URL?**

<https://poltavawave.com.ua/about>

**Is there a person or a group of persons responsible for these guidelines clearly identified?**

Yes

**Is that identification visible on the page with the guidelines?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

### 9.2 PURPOSE OF GUIDELINES

A Media Outlet shall ensure that these Editorial Guidelines set clear expectations of the behaviour it requires from its own staff, its contractors and from all other contributors to its editorial content. It should also set out the structure of responsibility within the organisation, making sure it is clear who is accountable for each stage of the process that leads to publication.

**Do the guidelines referred to in the section on Editorial Guidelines set clear expectations for the behaviour for all the contributors, including editorial staff (journalists, editors) and all other contributors?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do the guidelines referred to in the section on Editorial Guidelines make clear the structure of editorial responsibility for each stage of the publication process within the organisation?**

No

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## 9.3 GUIDELINES AND JOURNALISM PRINCIPLES

A Media Outlet shall ensure that these Editorial Guidelines embody the core ethical principles of journalism. The Editorial Guidelines may impose specific requirements in addition to these core ethical principles; but any additional requirements shall not compromise these core ethical principles as described in the Preamble of this document.

**Do your Editorial Guidelines include requirements for Accuracy (as prescribed in the Preamble) in your output?**

Yes

**What is the URL?**

Unanswered

**Do they include requirements for Independence (as prescribed in the Preamble) of editorial decision making?**

Yes

**What is the URL?**

Unanswered

**Do they include requirements of Fairness (as prescribed in the Preamble) in the practice of journalism?**

Yes

**What is the URL?**

Unanswered

**Do they include requirements for Accountability (as prescribed in the Preamble) in the practice of its journalism?**

Yes

**What is the URL?**

Unanswered



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## 9.4 CONFLICTS OF INTEREST

Editorial Guidelines shall ensure that there are no conflicts of interests – real, potential or perceived – damaging the integrity of the story or the editorial independence of those working on it. They should have guidance on how to deal with conflicts related to political, business and personal interests. Editorial structures should protect the journalism from any undue influence by the Media Outlet’s executive management or ownership authorities outside the formal editorial process and from any external interests, commercial, social or political.

**Do your Editorial Guidelines include protections against real, potential, or perceived conflicts of interest?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do the guidelines include guidance on how to deal with conflicts related to business?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do the guidelines include guidance on how to deal with conflicts related to political interests?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do the guidelines include guidance on how to deal with conflicts related to personal interests?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Does the Media Outlet’s structure protect the editorial processes from any undue influence from within or without?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered



## 10. ACCURACY

### 10.1 PROCESSES FOR ENSURING ACCURACY

The Media Outlet shall have internal rules with a systematic editorial process to make sure that the content is accurate and the Editorial Guidelines are adhered to. This may include the verification process for the content and the role of editorial oversight.

**Do you have internal rules and a systematic editorial process to ensure the accuracy of your content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do you have internal rules and a systematic editorial process to ensure that the Editorial Guidelines are adhered to?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do you have a verification process for content and the role of editorial oversight?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

### 10.2 PROCESS REVIEW

There shall be a mechanism for the periodic review of the editorial processes to ensure that they are in compliance with the Editorial Guidelines and that the accountability processes are effective and being used to support them.

**Do you have a mechanism for periodic review of the effectiveness of the implementation of your Editorial Guidelines in your editorial processes?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Is your accountability mechanism (internal or external) subject to periodic review?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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### 10.3 STATISTICS AND EXTERNAL CONTENT

Statistics and external photographs/video/audio content should be sourced and verified.

**Do your Editorial Guidelines require that statistics should be sourced and verified?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do your Editorial Guidelines require that external photographs/video/audio content should be sourced and verified?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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### 10.4 IDENTIFICATION OF JOURNALISTS, AGENCIES

Principle and secondary authors should be identified, or if not, then recorded via publishing mechanisms, so that this information can be accessed if there is a query. This includes any news agency material subscribed to by the Media Outlet. Any details of individuals should be subject to the legal requirements of data protection and security considerations.

**Are the Individual Journalists (including external sources) identified, for example through a byline, or recorded in publishing mechanism so that this information can be accessed?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Is all News Agency material used by the Media Outlet recorded and tracked?**

Yes

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### 10.5 LOCATION REPORTING

In news reporting, it should be clear to any reader or audience where a report is being written from, and if it includes location reporting. Where location reporting is constrained due to the mechanism or conditions of the facilitation this should be identified, e.g. an embed with an official army or independent travel with local militias. This may also include occasions where the reporting has been facilitated by a commercial, NGO or governmental organisation and labelling is necessary for transparency.

**Is location reporting identified in your content?**

N/A

**Do your Editorial Guidelines ensure that any constraint on location reporting be explained in the report or in the context of its publication?**

N/A

**Do your Editorial Guidelines require transparency where a location report has been facilitated by an external body?**

N/A

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### 10.6 AUTOMATICALLY GENERATED CONTENT

News content generated, wholly or partly, automatically by means of algorithmic processes (such as but not limited to text generating systems, bots or artificial intelligence) shall be clearly indicated.

**Do you publish any content that is automatically generated?**

No

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## 10.7 ALGORITHMIC DISSEMINATION AND CURATION

A Media Outlet shall indicate its policy on the use of algorithms for news content dissemination or curation and its adherence to best practice requirements from regulatory or advisory bodies.

**Do you use any algorithms for the dissemination or curation of content?**

Yes

**Do you clearly indicate your policy on your use of algorithms for the dissemination and curation of news content?**

No

**Does the Media Outlet adhere to best practice requirements from a regulatory or advisory body?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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## 10.8 TREATMENT OF EXPLICIT CONTENT

Editorial processes shall ensure the ethically appropriate treatment of violent and explicit content, of content which features children or other vulnerable people, and of live content.

**Do your Editorial Guidelines ensure the ethically appropriate treatment of violent and explicit content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do your Editorial Guidelines ensure the ethically appropriate treatment of content which features children or other vulnerable people?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do your Editorial Guidelines ensure the ethically appropriate handling of live content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**

**7/27/23**  
**7/27/23**

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## 11. RESPONSIBILITY FOR CONTENT PROVIDED BY THE GENERAL PUBLIC

### 11.1 USER GENERATED CONTENT/EYEWITNESS NEWS

A Media Outlet shall ensure that the same principles of checking for accuracy, legal, and ethical compliance are applied to journalistic content sourced from the general public (UGC or Eyewitness News content) as with all content it publishes.

**Does your Media Outlet publish any content that comes not from staff or freelancers but from external sources such as readers/viewers?**

No

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### 11.2 EDITORIAL GUIDELINES FOR UGC/EYEWITNESS NEWS

No answer is needed here because of your answer to the previous question.

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## 11.3 OPINION GUIDELINES

In relation to opinion or comment pieces the guidelines should set clear requirements of the ethical principles expected which may include but is not limited to prohibition of comment due to defamation, privacy, hate speech and harassment. The Media Outlet should make clear its policy on the moderation of such content, whether it is pre or post publication, and its policy on take-down, notice and appeal provisions.

**Do your Editorial Guidelines also include provision for ensuring comment material is free from defamation?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do your Editorial Guidelines also include provision for ensuring comment material is free from invasions of privacy?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do your Editorial Guidelines also include provision for ensuring comment material is free from hate speech?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do your Editorial Guidelines also include provision for ensuring comment material is free from harassment?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Is it clear to the public whether your Media Outlet's moderation of such comment is pre- or post-publication?**

Yes

**Does this policy allow for the removal of offending material?**

Yes



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## 12. RESPONSIBILITY FOR SOURCES

### 12.1 ANONYMITY

The procedures for granting anonymity to sources shall be covered by the Editorial Guidelines. The reason for anonymity should be clarified for the public.

**Are there guidelines on the procedures to be followed for granting anonymity to sources?**

Yes

**Are the reasons for granting anonymity made clear to the public?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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### 12.2 PRIVACY RIGHTS

Editorial guidelines should protect the privacy rights of individuals and their safety.

**Are there guidelines to ensure that the privacy rights and safety of individuals are protected in your journalistic activity?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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### 12.3 INDEPENDENCE AND SOURCES

There should be guidelines on establishing relations with sources which protect the independence of the journalism.

**Are there guidelines to ensure the independence of journalism relative to the sources for content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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### 12.4 DIVERSITY OF SOURCES

Editorial guidelines should ensure that a diversity of sources are consulted in producing journalistic content with adequate time for response.

**Do the guidelines ensure that a diversity of sources is used in the production of your journalistic content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**  
**7/27/23**  
**7/27/23**

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## 13. PROFESSIONALISM FOR AFFILIATIONS

### 13.1 SPONSORED CONTENT POLICIES

Professional journalism principles shall have clear and distinct editorial practices in distinguishing advertising and sponsored content, commercial or commissioned, from editorial content independently produced by the Media Outlet.

**Do your Editorial Guidelines have specific policies for distinguishing commercial or sponsored content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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### 13.2 SPONSORED CONTENT INDICATORS

In Media Outlets, sponsored content shall be clearly identified with the words content 'sponsored by', 'paid by' or other explicit and easy to understand terms. Particular care should be taken in distinguishing so called 'native' content (where the item is sponsored but is published or broadcast next to ordinary editorial content) from its surrounding material.

**Do you publish any sponsored content?**

Yes

**Do your Editorial Guidelines require all sponsored content to be clearly labelled or otherwise made clear?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do your Editorial Guidelines require sponsored content to be labelled and made clearly distinguishable from your own content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered



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### 13.3 SEPARATION OF NEWS AND OPINION

Editorial Guidelines shall ensure that there is a clear distinction between news content and opinion and between news content and other content provided by an external non-journalistic body by requiring labelling or an equivalent mechanism.

**Do your Editorial Guidelines require a clear distinction to be made between news content and opinion content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do your Editorial Guidelines require a clear distinction to be made between news content and commercial content?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do you in editorial practice or in Editorial Guidelines require a clear distinction to be made between news content and content supplied by an external non-journalistic body?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

Poltavska Khvyliia  
7/27/23  
7/27/23

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## 14. INTERNAL ACCOUNTABILITY

### 14.1 DEALING WITH INACCURACIES

There shall be a systematic editorial structure in the Media Outlet to ensure that any inaccuracies in its content are corrected in a timely and transparent manner. This shall include a clear process to allow potential errors to be communicated to the Media Outlet by the public and those with knowledge of the story and for assessing and dealing with the claims.

**Do you have a clear process to allow potential errors to be communicated to the Media Outlet by the public?**

Yes

**Do you publish that process?**

Yes

**What is the URL where it can be seen? Or, where is it seen next to each bit of Content?**

<https://poltavawave.com.ua/p/na-poltavshchini-rozshukuiut-bezvisno-zniklogo-17-richnogo-iunaka-794611>

<https://poltavawave.com.ua/p/rosiiski-viiska-zalishili-novu-kakhovku----genshtab-788277>

**Do you have a clear process to allow potential errors to be communicated to the Media Outlet by those with direct involvement in the story?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do you have a clear process for assessing and dealing with the claims?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Is there a systematic editorial structure in the Media Outlet to ensure that any inaccuracies in its content are corrected in a timely and transparent manner?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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### 14.2 PUBLISHING CORRECTIONS

In particular, in relation to inaccuracies, a Media Outlet shall adopt good practice for correcting inaccuracies, such as making a clear indication of the correction in a similarly prominent place and manner as the original version, such as the same URL or in similar time and format of broadcast.

**Does your Media Outlet guarantee the publication of the correction of all significant inaccuracies and errors in a similar place and manner as the original version, such as the same URL or in similar time and format of broadcast?**

Yes

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### 14.3 CONTACT AND PROCESS FOR COMPLAINTS

A Media Outlet shall have a designated person and/or contact information in place for complaints. A process shall exist for members of the public to open a dialogue with the organisation in the event of potential breaches of its journalism principles or Editorial Guidelines. This information shall be easily available.

**Does your organisation have a designated contact in the event of complaints about potential breaches of its journalism principles or Editorial Guidelines?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Does your organisation have a designated process for the public to open a dialogue with you regarding potential breaches of its journalism principles or Editorial Guidelines? (These may follow the Uniform Correction or Clarification act adopted by most U.S. States.)**

Yes

**Is that information clearly available?**

No

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### 14.4 INTERNAL PROCESS FOR COMPLAINTS

The Media Outlet shall have a clear procedure in place to ensure that all staff are aware of the process that must be followed when such a complaint is received. For example in larger Media Outlets, it must be known and accepted that the creator of a piece of journalism that is subject to such a complaint must escalate the issue to a designated third person. A Media Outlet shall ensure that complaints are addressed within the Media Outlet in a fair, reasonable and timely manner.

**Are your staff (Employees and Freelance) aware of the process that must be followed in the event of such complaints?**

Yes

**Are they aware that all such complaints must be brought to the attention of a senior member of staff (of organisations large enough to have a staff) not directly connected with the creation of the story?**

Yes

**Is your Media Outlet committed to the resolution of any such complaints in a fair, reasonable and timely manner?**

Yes

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### 14.5 INDEPENDENCE OF OMBUDSPERSON

Where a Media Outlet's internal accountability mechanism takes the form of an ombudsperson, that person may be appointed by the Media Outlet; but in this case there shall be a transparent process for his/her appointment and the ombudsperson's independence shall be protected to ensure that he/she cannot be removed from the position simply for challenging journalistic or editorial decisions or actions.

**Does the Media Outlet have an Ombudsperson?**

N/A

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### 14.6 POWERS OF OMBUDSPERSON



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**  
**7/27/23**  
**7/27/23**

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## 15. EXTERNAL ACCOUNTABILITY

### 15.1 EXTERNAL OVERSIGHT

Trust in the Media Outlet is enhanced if it is subject to a form of external accountability that is effective and independent. To this end where appropriate, a Media Outlet may wish to commit to an independent and effective form of external accountability for its journalism principles, which may take the form of an external ombudsperson, press or media council or statutory regulator.

**Have you committed to a system or systems of external accountability for your editorial content?**

No

### 15.2 COMPLIANCE WITH EXTERNAL ACCOUNTABILITY

Where a Media Outlet commits to a form of external accountability, it shall comply with any guidance, structures or best practice directions issued by that body.

**Is your Media Outlet committed to comply with any directions or guidance issued by the external accountability body to which you subscribe?**

N/A

### 15.3 ABSENCE OF EXTERNAL OVERSIGHT

External accountability is not always possible due to the absence of such mechanisms in many countries or a lack of confidence in the efficacy, independence or trustworthiness of existing mechanisms. Where this is the case it may be helpful for the Media Outlet to state the reasons for non-compliance, taking into account the legal requirements applicable to particular media. The Media Outlet may in certain cases align with other media entities to participate in a more appropriate mechanism.

**Is your Media Outlet subject to an external regulatory mechanism for content that you find it not possible to comply with?**

No

### 15.4 CONTACT DETAILS OF EXTERNAL ACCOUNTABILITY BODIES

Where a Media Outlet commits to a form of external accountability, it shall publicise the process by which the public can contact that body to complain about potential breaches of its Editorial Guidelines in a manner that is easily accessible for all.

**Are the mechanisms for the public to complain about breaches of your Editorial Guidelines to an external body publicly available?**

N/A

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## 15.5 OTHER ASSOCIATIONS

The Media Outlet may publicly list its membership of all bodies that require members to adhere to published guidelines, standards or norms to maintain status in that organisation. Best practice is to publish which groups a Media Outlet is a member of, listing the names and contact details.

**Do you belong to any other bodies that require members to adhere to published guidelines, standards or norms to maintain status in that organisation?**

No



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**  
**7/27/23**  
**7/27/23**

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## 16. PROFESSIONALISM IN THE MEDIA OUTLET

### 16.1 RECRUITMENT AND TRAINING

There shall be professional guidelines for the recruitment and training of editorial staff. This includes responsibilities for implementing diversity policy and staff welfare. Recruitment policy, (use of open competition etc.) and staff welfare principles should be publicly available.

**Do you have guidelines for the recruitment and training of editorial staff?**

Yes

**Do those guidelines contain a diversity policy?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do those guidelines cover staff welfare?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Are they publicly available?**

No

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## 16.2 WORKING CONDITIONS, CONTRACT POLICY AND LABOUR RELATIONS

Journalistic principles and practice should be supported by the organisational environment including protection for journalistic integrity through adherence to labour laws and regulations, transparency of contract policy and freedom to organise. The duration or nature of the contract should not inhibit a journalist from operating in an ethical manner and the organisation structure should protect that principle.

**Do the regulations and guidelines for the employment of staff and engagement of contract journalists protect their editorial independence?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Are your employees (including freelance) covered by legal contracts and insurance?**

Yes

**Does your staff have the freedom to organise?**

N/A

**Do you have an existing structure for social dialogue including a collective bargaining arrangement with appropriate trade unions?**

N/A

**Are there guidelines for contracts of engagement with freelance journalists?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Do these guidelines ensure the ability of freelancers to adhere to the editorial principles?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

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## 16.3 STAFF WELFARE

Responsibility for the welfare of staff and those contracted on a freelance basis should be an important part of a Media Outlet's role. Organisational Editorial Guidelines should be protective against any form of discrimination and supportive of equality of opportunity. It should ensure safety at work and in the working environment (including remote and online) and have guidelines, which support staff who have been exposed to material of a sensitive or upsetting nature or have suffered physical or psychological harm in the course of their work.

**Does your Media Outlet's rules and procedures protect against discrimination in the workplace?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Does your Media Outlet's rules and procedures support equality of opportunity?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Does your Media Outlet have a safety at work policy, which includes specific protection for journalists working in hostile environments?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Does your Media Outlet have guidelines to support editorial staff who have been exposed to material of a sensitive or upsetting nature?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered

**Does your Media Outlet have guidelines to support editorial staff who suffered physical or psychological harm in the course of their work?**

Yes

**If you want to publish additional information, please provide it here.**

Unanswered





Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**

**7/27/23**  
**7/27/23**

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## 17. TRAINING

### 17.1 TRAINING IN EDITORIAL GUIDELINES

A Media Outlet should have a structured mechanism to ensure that its employees or operators have full training in journalism principles, Editorial Guidelines and the demands laid down by legal and ethical compliance.

**Does your Media Outlet have a training programme for editorial staff that includes sections on the Editorial Guidelines and other legal and ethical issues?**

Yes

**Is there refresher training available for significant changes in the law or guidelines?**

Yes

**Does your staff have expert advice available for consultation when dealing with legal and compliance issues?**

Yes



Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**

**7/27/23**  
**7/27/23**

---

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Media Outlet  
Legal Entity  
Date of first publication  
Date of Latest Change

**Poltavska Khvyliia**  
**7/27/23**  
**7/27/23**

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## 18. PUBLICATION OF SELF-ASSESSMENT

### 18.1 GENERAL PUBLIC

After conducting a self-assessment according to this Standard, a Media Outlet should publish the results in ways visible to the public, preferably online. Best practice is to publish the full text of the questions and answers on an “about” or similar page on the website of the Media Outlet.

**Does your Media Outlet publish your answers to this self-assessment based on the JTI Standard?**

Yes

**Is it available to readers?**

Yes

**What is the URL?**

Unanswered

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### 18.2 MACHINE-READABILITY

A Media Outlet should publish the answers from the self-assessment in a format making it easily visible to machine readers employed by advertisers, social media and related platforms, researchers and others.

**Does your Media Outlet publish your answers in a machine-readable format?**

Yes

**What is the URL?**

<https://www.jti-app.com/report/My1Dn8LdP3LNa9oq>