

Appendix No. 1

APPROVED BY  
Order of ROSATOM  
No. 1/403-II dated 05.03.2024

UNIFIED INDUSTRY CODE  
of Ethics and Business Conduct for the employees  
of Rosatom State Corporation and its organizations

## Table of Contents

1. Purpose and scope .....	3
2. Abbreviations .....	3
3. Values of the Corporation and its organizations .....	6
4. The Corporation and its organizations as an employer.....	6
5. Ethical conflicts and reporting of violations .....	9
6. The main types of ethical dilemmas (ethical choice situations) and ways to resolve them.....	10
7. Safety and environmental care .....	11
8. Information security .....	12
9. Preservation of resources and property.....	13
10. E-mail, Internet and information systems .....	13
11. Compliance with corporate image and style .....	14
12. Culture of communication and conduct at the workplace.....	14
13. Stakeholder interfaces.....	15
14. Compliance with the Code.....	17
15. Reports on violations.....	17
16. Regulatory references.....	18

## 1. Purpose and scope

1.1. The Unified Industry Code of Ethics and Business Conduct for Employees of Rosatom State Corporation and its Organizations (hereinafter referred to as the Code) has been developed as a follow-up to the provisions of Article 13.3 of Federal Law No. 273-FZ dated December 25, 2008 “On anti-corruption enforcement” [16.7] and to establish uniform ethical standards and regulations of business conduct in Rosatom State Corporation (hereinafter referred to as the Corporation) and its organizations, that are mandatory for application within all process groups of the management process model of the civil part of the industry.

1.2. The Code establishes the requirements of business conduct and ethics when interacting within the Corporation and its organizations, as well as with external stakeholders, including government authorities, suppliers, partners, and society.

1.3. The Code has been developed for the purpose of:

- strengthening the business reputation of the Corporation and its organizations;
- establishing rules of conduct for employees of the Corporation and its organizations, honest and fair treatment of employees, suppliers, partners in the regions and territories where the Corporation and its organizations operate, while maintaining commitment to the values of the Corporation and its organizations;
- prevention and minimization of risks associated with violations of business conduct and ethics accepted in the Corporation and its organizations;
- preventive measures to prevent possible legislation violations and conflict situations, solutions for ethical dilemmas situations (situations of ethical choice).

1.4. Compliance with the Code is mandatory for employees of the Corporation and its organizations.

1.5. When concluding works performance contracts/rendering services to suppliers, contractors, and interested third parties it is recommended to propose to comply with the requirements of this Code.

1.6. Organizations of the Corporation operating abroad may develop codes of ethics based on the provisions of this Code, the applicable legislation of foreign countries, taking into account their customs and cultures. If there are contradictions between the provisions of the Code and the applicable legislation of foreign countries, the provisions of the legislation of such foreign countries shall apply.

1.7. The Deputy General Director for Personnel is responsible for updating the Code and monitoring its implementation.

## 2. Abbreviations

Acronyms used for the purpose of this document and their expansions:

Abbreviations	Interpretation
Anti-Corruption Policy	An industry regulatory document defining common principles, methodological approaches, and anti-corruption tools (i.1.1 of the Anti-Corruption Policy [16.7])
Hot line	Conventional name of communication channels specially equipped to ensure confidential information of the Corporation on violations and protection of personal data of applicants, including directly in the Corporation: e-mail

Abbreviations	Interpretation
	<a href="mailto:0707@rosatom.ru">0707@rosatom.ru</a> ; telephone-answering system for oral messages: 8(800) 100-07-07 (24/7, toll free).
Business ethics	A set of rules, ethical standards and values that determine a person's behavior in the corporate environment and beyond.
Business conduct	The system of actions of employees of the Corporation and its organizations related to the implementation of the business interests of the Corporation and its organizations, which is implemented through business communication, establishing relationships with customers, partners, subordinates, managers, colleagues, other stakeholders and making decisions that contribute to success.
Stakeholders	Individual or organization who can influence the activity implementation or decision-making, be subject to their influence or perceive themselves as the latter.
Conflict of interests	A situation in which the personal interest (direct or indirect) of a person filling a position, which provides for an obligation to take measures to prevent and resolve a conflict of interest, affects or may affect a proper, objective and impartial performance of his official duties (exercise of powers).
Information secrecy	Binding requirement for the person who gained admission to certain information, not to transfer such information to third parties without the consent of its owner.
Ethics Committee	A permanent body, established and operating for an ethical assessment of the actions of the employees of the Corporation and its organizations in terms of their meeting the requirements of the Code.
Indigenous peoples	Indigenous small-numbered peoples of the Russian Federation are peoples living in the territories of the traditional settlement of their ancestors, preserving traditional lifestyles, economic activities and crafts, numbering less than 50 thousand people in the Russian Federation and recognizing themselves as independent ethnic communities. If there are similar population groups in the regions and territories where the Corporation and its organizations operate, the legislation of these regions and territories should be followed.
Corporate image	The image of the Corporation and its organizations formed in the public consciousness
Corruption	Abuse of official position, giving a bribe, receiving a bribe, abuse of authorities, commercial bribery or other illegal use by an individual of his/her official position contrary to the legitimate interests of society and the state in order to obtain

Abbreviations	Interpretation
	benefits in the form of money, valuables, other property or monetizable services, other property rights for himself/herself/itself or for third parties, or the illegal provision of such benefits to the specified person by other individuals. Corruption is also the commission of the listed acts on behalf of or in the interests of a legal entity.
Personal interest	Possibility of income generation in the form of money, other property, including property rights, services associated with property, the results of performed work or some benefits (advantages), by the employee of the Corporation or its organization filling a position, which provides for an obligation to take measures to prevent or resolve a conflict of interest, and/or by persons who are closely related to him/her (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and the spouses of children), citizens or organizations, with which the specified employee and/or persons closely related to him/her are connected through property, corporate or other close relationships.
IRD	Internal Regulatory Document
IAEA	International Atomic Energy Agency
MTS	Material and Technical Support
Relatives	Spouse, parents, children, adoptive parents, adopted children, full- and half-siblings, grandfathers, grandmothers, grandchildren.
In-laws	Individuals who are not related by blood, but joined the family as a result of marriage: father-in-law and mother-in-law, brothers and sisters of one of the spouses in relation to the other spouse, parents of the spouses among themselves.
Human Resources Management Department	The structural subdivision of the management company, the HR Department and NWC Organizational Development (for NWC organizations), the structural subdivision in the Rosatom State Corporation and its organizations responsible for the personnel management function.
MM	Mass media
Co-working relatives (in-laws)	A situation in which close relatives or relatives work in the same organization.
HRMD	Human Resources Management Department
Favoritism	Biased attitude and patronage.
Values of the Corporation and its organizations	The basic moral and personal attitudes of employees of the Corporation and its organizations, adopted as the main guidelines for decision-making in situations where there are no clear instructions and prescribed regulations.

Abbreviations	Interpretation
Ethical issue	A question concerning the requirements described in the Code.
Ethical dilemma (ethical choice situation)	A situation in which an employee of a Corporation and its organization is confronted with a choice of two or more possible options. An ethical dilemma may include a situation in which the personal interests of an employee of a Corporation and its organization may influence (violate or contradict) the performance of their job duties.
Ethical conclusion	Conclusion/list of conclusions made based on the results of the ethical examination of the Ethics Committee.
Ethical conflict	A situation in which there is a contradiction between the standards of business ethics and the circumstances that have developed in the course of work. The subject of the conflict is the deviation of one of the relationship subjects from the established standards of business ethics, or the orientation of the subjects of the relationship to different standards of conduct.
Ethical assessment	Interpretation of actions/inaction of employees of the Corporation and its organizations in terms of compliance of their conduct with the requirements described in the Code, as well as verification of documents and facts conducted by the Ethics Committee.
Ethical practice	Management practice (regulation of activities) based on ethical principles.
NWC	Nuclear Weapons Complex

### 3. Values of the Corporation and its organizations

Employees of the Corporation and its organizations, when making decisions in situations where there are no regulatory requirements, shall rely on the basic moral and personal attitudes - the values of the Corporation and its organizations.

The Corporation and its organizations have developed a model of corporate values, which includes such values as “Safety”, “One step ahead”, “Responsibility for results”, “Efficiency”, “United team”, “Respect”, and behavioral indicators for each of them. [16.13]

### 4. The Corporation and its organizations as an employer

4.1. The Corporation and its organizations strive to become the best at unlocking the potential of employees.

The Corporation and its organizations create an environment in which every employee can fulfill his/her potential, regardless of the region of residence, gender, age, employment form, physical abilities and state.

The Corporation and its organizations build an open culture of trust, respect, horizontal interaction without barriers, provide access to the best technologies and open direct communications that stimulate initiative and use of employee talents.

#### 4.2. Respect for human rights and working environment

The Corporation and its organizations implement international projects in different countries and continents, bring together employees from different regions, with different cultural experiences, world outlook and religious beliefs. The Corporation and its organizations respect cultural diversity and individual differences.

The Corporation and its organizations confirm their responsibility for the observance of human rights defined by the legislation of the Russian Federation, the Universal Declaration of Human Rights adopted by the United Nations General Assembly, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the United Nations Declaration on the Rights of Indigenous Peoples, the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work, Conventions of the International Labor Organization, The United Nations Global Compact.

The principles of the Corporation and its organizations in the field of human rights and the mechanisms for their implementation in cooperation with employees of the Corporation and its organizations, as well as other stakeholders, are defined in the Unified Industry Human Rights Policy. [16.23] Human rights are respected by employees of the Corporation and its organizations in any regions and in any territories where the Corporation and its organizations operate, in any cultures and under any circumstances.

The Corporation and its organizations recognize labor rights as an integral part of human rights, comply with the principles of social partnership, the terms of the effective Industry Agreement on Nuclear Power, Industry and Science, collective agreements.

The Corporation and its organizations support industry veterans in accordance with the provisions of the Unified Industry Social Policy of Rosatom State Corporation and its organizations. [16.18]

The Corporation and its organizations ensure the equality of employees and exclude favoritism. All employees are guaranteed equal opportunities at employment, determining remuneration, providing access to training and development, career advancement, dismissal, retirement, fulfilling one's potential, career growth and development, regardless of race, skin color, nationality, ethnicity, origin and place of birth, gender, age, religion and religious beliefs, property, social, official, marital status, political convictions, membership in public associations, physical abilities of a person.

The Corporation and its organizations completely exclude forms of coerced and forced labor, child labor; threats of physical, sexual or other violence, verbal insults and any form of humiliation of honor and human dignity are unacceptable.

The basis of the relationship between employees is the values of the Corporation and its organizations. In the Corporation and its organizations, every employee has the opportunity to freely express ideas aimed at improving the effectiveness and efficiency of organizations, learning lessons.

The Corporation and its organizations strictly comply with the labor legislation of the regions and territories where the Corporation and its organizations operate, advocate

for a reasonable balance between work and personal life of employees, and respect their interests outside of work.

Working time standards are established in accordance with the legislation of the states of the Corporation's presence, for Russia it is the Labor Code of the Russian Federation. [16.1]

The Corporation and its organizations welcome working labor dynasties, passing down the skills through the generations. At the same time, relatives of employees do not receive additional benefits when applying for a job. Protectionism in any form, including nepotism-based protectionism, is unacceptable for a Corporation and its organizations.

#### 4.3. Business conduct of employees of the Corporation and its organizations

In their daily work, employees are guided by the values of the Corporation and its organizations, the standards and rules of conduct given in this section:

show zero tolerance to OHS violations, violations of fire safety rules, safety in the field of information use, information security;

do not allow insults to the honor and dignity of people;

do not allow acts of corruption;

do not allow favoritism and discrimination related to race, skin color, nationality, ethnicity, gender, age, religion and religious beliefs, property, social, official, marital status, political convictions, membership in public associations permitted on the territory of the Russian Federation, human physical abilities and other similar characteristics;

do not allow coercion and harassment in any form;

do not allow the spreading knowingly false information tarnishing the honor and dignity of employees and partners, and damaging their reputation;

respect human rights, treat their work colleagues, clients and partners with respect;

handle information responsibly and do not disclose confidential information;

avoid conflicts of interest;

promptly notify their direct manager of the appeals of any persons in order to induce them to commit actions leading to violations of business conduct and ethics, the requirements for which are described in this Code.

#### 4.4. Rules of business conduct for the heads of the Corporation and its organizations

The heads of the Corporation and its organizations assume responsibility both for compliance with the Code and for creating and maintaining a culture of trust and openness in which employees freely inform managers about their doubts and problems.

Heads of the Corporation and its organizations:

act as guarantors of compliance with the requirements of business conduct and ethics, demonstrate by personal example their commitment to business conduct and ethics, as well as the requirements of Human Rights Policy, Anti-Corruption Policy, and security policy;

do not allow any form of discrimination, favoritism and protectionism, harassment and violence in their management activities, as well as the use of methods that harm the personal dignity of employees, making unreasonable, illegal or unfair decisions. The relationship between the heads and employees is based on respect, trust, mutual responsibility and full respect for human rights;



give instructions that comply with the requirements of the legislation, this Code, and other IRD of the Corporation or its organization;

take immediate measures to eliminate violations of legislation, local regulations of the Corporation or organization, including this Code;

give briefings to subordinate employees on application of the Code, provide support to employees who initiate discussion on ethical issues;

take into account the commitment of subordinate employees to the values of the Corporation and its organizations, compliance of employee conduct with the standards of business conduct and ethics set forth in this Code, during annual assessment, awarding the Corporation awards, nomination of candidates to the managerial candidate pool, making decisions on appointment to a higher position, rotation, referral to training and development programs;

are attentive to ensuring the working conditions and needs of subordinate employees, providing them with opportunities for career growth and development;

create an environment in teams that contributes to actualization of employees potential, encourage teamwork, exchange of experience and knowledge;

show leadership in the development of a safety culture.

## **5. Ethical conflicts and reporting of violations**

5.1. If there are doubts about what to do in a particular situation, the employee should ask himself the following questions.

Does my decision, action or inaction comply with the legislation of the Russian Federation, the values of the Corporation and its organizations, the Code, and other IRD of the Corporation and its organizations? How justified is my decision, action or inaction from the point of view of the interests of the Corporation and its organizations?

Have I taken into account the possible risks and interests of all persons who may be affected by it?

Am I sure that this decision, action/inaction will not have a negative effect on the reputation of the Corporation and its organizations?

If other people find out about what I did, will I still think that I had acted correctly?

5.2. In case of a negative answer to any of the questions specified in i. 5.1 of this Code, as well as in case of uncertainty about the correctness of his choice, the employee shall seek advice from his direct manager, superior manager or employees of the HRMD.

5.3. If the employee believes that the manager is involved in activities that violate the requirements of the Code, the employee shall contact a higher-level manager, or address his questions and information via the channels specified in section 15 of this Code.

5.4 Information received from an employee about violations of business conduct and ethics and (or) signs of violations in compliance with confidentiality requirements is reviewed and verified in accordance with the procedure established by the Corporation and its organizations.

5.5. Violations that must be reported immediately:

offering and receiving a bribe, an agreement to give a bribe, to pay for assistance;

conflict of interests;

inducement to commit corruption and other offenses;

receiving a gift and other signs of business hospitality, except for the case specified in the first paragraph of i. 6.4, related to the official position and/or performance of official duties;

fraud, actions that lead to accounting misstatements of a Corporation or its organizations;

circumstances threatening the safety, life and health of employees and other stakeholders;

violation of the requirements of business conduct and ethics, as a result of which an employee or a Corporation and its organizations have suffered reputational damage or there is a threat of causing it;

violation of the secrecy and information security requirements.

## **6. The main types of ethical dilemmas (ethical choice situations) and ways to resolve them**

### 6.1. Conflict of interests

Employees of the Corporation and its organizations avoid situations that lead to a conflict of interest or have signs of it, take the prescribed measures to prevent the occurrence of a conflict of interest and resolve the conflicts of interest that have arisen.

The actions of an employee of a Corporation or its organization in the event of a conflict of interest or the possibility of a conflict of interest are defined in the IRD approved by the Corporation and its organizations, which establish the procedure for taking measures to prevent any possibility of a conflict of interest (informing the employer's employees about the personal interest that leads or may lead to a conflict of interest).

### 6.2. Co-working relatives

Employment (work) of the relatives or in-laws on the terms of direct subordination or supervision of one of them over another, if one of them holds/replaces the position of head, deputy head, chief accountant of a Corporation or its organization is not allowed.

It is necessary to avoid the employment (work) of relatives or in-laws on the terms of direct subordination or supervision of one of them over another, if one of them holds /replaces the position of a middle or junior level manager with organizational and administrative authority. In exceptional cases, such employment (work) is possible provided that these employees take measures to prevent any possibility of a conflict of interest.

Personnel decisions, including hiring, transfer, appointment to a higher position, enrollment in the candidates pool, in the Corporation and its organizations, are made based on an objective assessment of candidates, their professionalism and compliance with the values of the Corporation and its organizations.

Employees of the Corporation and its organizations do not influence decisions on career advancement of their relatives/in-laws working in the Corporation and its organizations, nor do they use kinship ties to facilitate other decisions.

### 6.3. Prevention of corruption

An atmosphere of intolerance towards corrupt conduct has been created and maintained in the Corporation and its organizations.

Prevention of corruption in the Corporation and its organizations is implemented in accordance with the Anti-Corruption Policy. [16.7]

The heads of the Corporation and its organizations act to guarantee the implementation of anti-corruption rules and procedures, demonstrate a personal example of following anti-corruption standards of conduct and bear personal responsibility for non-compliance with the principles of Anti-Corruption Policy.

#### 6.4. Receiving and giving gifts, exercise of hospitality

Receiving and giving gifts, exercise of hospitality related to protocol events, business trips and other official events are a sign of politeness and respect, promote good business relations, provided that they are symbolic in nature, are not intended to influence decision-making and do not give rise to perceiving such influence.

Employees of the Corporation and its organizations, when receiving a gift in connection with protocol events, business trips and other official events, act in accordance with local regulations of the Corporation or its organizations.

In the situation of making a decision on giving/receiving a gift, employees of the Corporation and its organizations shall take into account that, in accordance with the legislation of the Russian Federation, in particular, donation is not allowed, except for ordinary gifts, the value of which does not exceed three thousand rubles:

Persons holding official positions of the Russian Federation, official positions of subjects of the Russian Federation, municipal positions, government employee, municipal employees, employees of the Bank of Russia, employees holding positions in state corporations, state-run non-profit companies, the Pension and Social Insurance Fund of the Russian Federation, the Federal Mandatory Health Insurance Fund, other organizations established by the Russian Federation on the basis of federal laws, organizations created to perform tasks, assigned to federal state bodies in connection with their official position or in connection with the performance of their official duties<sup>1</sup>;

in relations between commercial organizations.

Gifts that employees give inside the organization (to colleagues) shall be exclusively symbolic.

If an employee doubts what to do when receiving a gift or in connection with the desire to present a gift, then he addresses the department or to the official responsible for prevention of corruption and other offenses.

## **7. Safety and environmental care**

### 7.1. Safety of life and health of employees

Ensuring the safety, preservation of the life and health of employees in the course of their work performance is a priority in the activities of managers and other officials of the Corporation and its organizations.

The Corporation and its organizations follow the standards of Russian environmental legislation and the requirements of recognized international safety standards.

---

<sup>1</sup> In relation to this category, donation is allowed in connection with protocol events, business trips and other official events

The activities of employees comply with the goals and principles of safety defined by the Unified Industry Safety Culture Policy of Rosatom State Corporation and its organizations. [16.21]

The Corporation and its organizations monitor the activities of contractors and the fulfillment of safety requirements in the contractual relations system, provide the necessary training and information to contractors in accordance with the goals and principles of safety of the Corporation and its organizations.

The Corporation and its organizations provide employees with safe working conditions. In the Corporation and its organizations, without exception, all injuries, incidents and accidents at work, as well as their background, are subject to investigation in accordance with regulatory documents on OHS. [16.25] Based on the results of investigations, measures are being taken to prevent the recurrence of such events.

Employees of the Corporation and its organizations adhere to the basic principles of safety culture in accordance with the Unified Industry Safety Culture Policy of Rosatom State Corporation and its organizations in the field of OHS. [16.25]

All employees of the Corporation and its organizations work to prevent accidents by analyzing possible risks, dangerous actions, learning lessons from negative events that have occurred, and also carry out prevention of their occurrence.

#### 7.2. Environmental care

The Corporation and its organizations comply with the principles of environmental policy established in the Unified Industry Environmental Policy of the Rosatom State Corporation. [16.16]

### **8. Information security**

8.1. An employee of the Corporation and its organizations shall comply with the requirements of the legislation of the regions and territories where the Corporation and its organizations operate, the requirements of local regulations of the Corporation and its organizations in the field of information security. [16.24]

Violation of the rules for handling confidential information, its ill-considered dissemination to third parties may cause damage to the Corporation and its organizations, as well as lead to personal liability for violation - from disciplinary to criminal.

Employees of the Corporation and its organizations ensure the integrity, accessibility and confidentiality of information.

The principles in the field of security of information constituting a commercial secret are established in the Unified Industry Policy on Protection of Information Constituting Commercial Secret. [16.11]

8.2. When handling personal data, each employee is responsible for compliance with the following requirements:

- data processing shall be legal, acceptable and transparent;

- data processing shall be carried out on the basis of a specific, objective, informed, conscious and unambiguous consent of the person and in accordance with pre-determined legitimate goals;

- processing, including the collection of data unnecessary for the performance of work duties, is prohibited;

- the data shall be accurate and up-to-date;

the storage period of the collected data shall be limited;  
the security and protection of personal data shall be ensured.

### **9. Preservation of resources and property**

The property and resources of the Corporation and its organizations are used only for their intended purpose.

Employees of the Corporation and its organizations:

handle property carefully, economically spend the resources of the Corporation and its organizations and do not use them for personal purposes;

when planning and using resources, choose an option where it is possible to incur minimum costs unless it affects safety, quality and timing;

use the resources and property of the Corporation (including tools and equipment, vehicles and various types of communications) only for their intended purpose and to perform work duties only;

carry out business trips to fulfill their goals and objectives, taking into account the standards and limits established in local regulations of the Corporation and its organizations on registration and payment of employees business trips;

protect property and resources, including intellectual property, from loss, theft, misuse, illegal or inefficient use;

warn colleagues against negligent and wasteful treatment of property and resources.

If there are doubts about the legality of the use of property and resources, employees shall contact their direct manager or send an e-mail message: [0707@rosatom.ru](mailto:0707@rosatom.ru).

### **10. E-mail, Internet and information systems**

The information systems of the Corporation and its organizations are provided to employees to perform their work duties. Employees use these systems in accordance with local regulations on information security of the Corporation or its organizations.

Employees of the Corporation and its organizations:

responsibly use the e-mail and accounts of the Corporation and its organizations on the Internet telecommunications network;

comply with the provisions of the documents regulating the procedure for handling information of limited access, employees' personal data;

transfer information of limited access to third parties in accordance with the legislation and Corporation local regulations, issued pursuant to the legislation;

not express a personal opinion on behalf of the Corporation or its organizations, unless otherwise established by the IRD of the Corporation or organization;

not distribute or discuss information related to the activities of the Corporation and its organizations, clients, customers, employees of the Corporation and its organizations or other interested parties on public Internet resources without the consent of the Corporation and its organizations;

not post photos and video images that are not consistent with the reality and/or discredit the business reputation of the Corporation and its organizations.

## **11. Compliance with corporate image and style**

Each employee contributes to the creation of a corporate image.

When interacting with stakeholders, including when performing activities jointly within the organization, employees comply with the requirements of business conduct and ethics, avoiding actions that may damage the corporate image.

Such actions include, for example, negative statements and publications about the activities of the Corporation and its organizations, inappropriate behavior at events where employees represent the interests of the employer.

Choosing clothes, the employee shall be guided by the following basic rules:

moderation;  
cared-for look;  
cleanliness;  
functionality.

At production sites, special clothing that meets the functions performed and the requirements for ensuring safety at work is mandatory.

When participating in business events both inside and outside the industry, the obligatory items of office workers' clothing are a business suit/dress, closed shoes of classic style.

A free style of dress that does not contradict generally accepted standards of business conduct and ethics is acceptable if there are no events that require personal presence joint with other employees in the office or outside it.

When choosing clothes, it is necessary to take into account the customs of the regions and territories where the Corporation and its organizations are present, to show respect for the cultural and national characteristics of countries, standards and rules of behavior accepted in society. If there are no indications of the style of clothing, it is necessary to adhere to the traditional business style.

## **12. Culture of communication and conduct at the workplace**

Requirements for workplace behavior are established by the rules of the internal labor regulations of the Corporation or its organizations, compliance with which is mandatory for all employees of the Corporation and its organizations.

Actions that endanger or encroach on life, health, sanitary and epidemiological well-being, public morality, sexual inviolability and sexual freedom are unacceptable [16.2, 16.3].

It is unacceptable to make decisions on employment or job promotion based on the consent or refusal of the candidate for employment/employee with the behavior of the employer or his representative, which can be regarded as an encroachment on sexual freedom and (or) inviolability.

Harassment, intimidation, and the creation of a hostile or offensive atmosphere in the workplace against employees who have reported violations of sexual freedom and (or) inviolability are prohibited.

As an encroachment on the life, health, sanitary and epidemiological well-being of employees, work under the influence of alcohol, drugs or substances (including medicines that are controlled on the territory of the Russian Federation or abroad), the presence of

an employee with him, sale, use, transfer or distribution of drugs or substances can be considered controlled and other actions prohibited by law.

Actions and conduct that belittles human dignity or are a manifestation of hostility or intimidation are unacceptable. Such conduct may also include direct or indirect verbal insults or threats, unfriendly and dismissing remarks, rude jokes, unwanted letters or calls, the display of offensive or humiliating photographs and images, inappropriate physical touching that goes beyond the limits established by the requirements of business conduct and ethics or industrial necessity, physical assault or other similar actions that cause emotional and/or physical discomfort to another person.

### **13. Stakeholder interfaces**

#### 13.1. Interaction with state authorities

Managers and employees of the Corporation and its organizations:

recognize their liability towards the state related to significance and specifics of their activities;

strictly follow the requirements of the legislation of the Russian Federation, strive to be a model in fulfilling legal and ethical obligations towards states;

build stable and constructive relationships with state authorities and local self-government, based on the principles of responsibility and good faith;

in their activities, shall be guided by the legislation of the Russian Federation and the regulations of international law;

make no use of their official position to influence the activities of state bodies, organizations, officials, civil servants and citizens while dealing with personal matters;

show civility and consideration in dealing with citizens and officials;

refrain from public statements, judgments and assessments on behalf of the Corporation and its organizations, including on the Internet, in relation to the activities of state and local government bodies, their heads, if this is not part of employees' official duties.

#### 13.2. Interfaces with shareholders, members and investors

The Corporation and its organizations take care of increasing their own investment attractiveness and strengthening their business reputation.

Transparency and openness are the basis for showing trust in a Corporation and its organizations.

The Corporation and its organizations promptly and fully inform shareholders, members and investors of essential information about their activities by publicly disclosing it in accordance with the law, exception for disclosing information about which is a state secret or other information of limited distribution.

The Corporation and its organizations respect the rights of shareholders, members and investors, ensuring that they comply with the interests established by the legislation of the Russian Federation, the Corporation's IRD and other documents regulating the interfaces.

#### 13.3. Interfaces with clients, customers, contractors, business partners and suppliers

The Corporation and its organizations build interaction with contractors and business partners on an open and mutually beneficial basis, fully fulfilling their

obligations. At the same time, the Corporation and its organizations impose high requirements to the quality of goods, works and services provided, to the reliability of contractors and business partners, to their compliance with the requirements of business conduct and ethics, and anti-corruption requirements. [16.7]

Employees of the Corporation and its organizations:

shall consider carefully and respond timely to complaints, applications and proposals received by the Corporation and its organizations, on issues of interaction with contractors and business partners.

#### 13.4. Interfaces with public and public organizations

The activities of the Corporation and its organizations affect residents of the regions and territories where the Corporation and its organizations operate. Realizing the importance of their activities, the Corporation and its organizations adhere to the rules of social accountability to their employees and their family members, to industry veterans, and to society as a whole.

The Corporation and its organizations strive to contribute to the development of the regions and territories where the Corporation and its organizations operate by participating in solving various tasks and implementing development-related projects.

Employees of the Corporation and its organizations:

show respect for the customs and traditions of peoples in the regions and territories where the Corporation and its organizations operate (including small peoples), take into account the cultural and other characteristics of various ethnic, social groups and faiths;

observe neutrality preventing the eventual influence of political parties, other public associations' decisions on their official business;

exclude actions that could cast doubt on the objective performance by employees of the Corporation and its organizations of their duties, as well as prevent conflict situations that could damage their reputation and the authority of the Corporation and its organizations;

give no preference to any professional or social groups or organizations, remain independent from the influence of individual citizens, professional or social groups and organizations;

can contribute to the development of the regions and territories where the Corporation and its organizations operate by participating in volunteer and social projects.

#### 13.5. Interfaces with the mass media

The Corporation and its organizations interact with the mass media in accordance with the Uniform Industry Procedural Instructions on the Rules for Information Disclosure and Communication of Rosatom State Corporation Employees and Organizations with Mass Media [16.20] through structural subdivisions and/or employees with appropriate authority, taking into account the openness and transparency of information. Only authorized officials of the Corporation and its organizations can speak in the media, as well as at events with the participation of the media.

The Corporation and its organizations comply with the following rules in their interfaces with the mass media:

use only statements or statements agreed with the authorized structural subdivision of the Corporation or its organizations that can be perceived as the official position of the Corporation or its organization;



submit to the mass media only information and documents on the activities of the Corporation or its organization agreed with the authorized structural subdivision of the Corporation or its organizations;

agree the performance of an employee of a Corporation or its organization at a public event with the participation of federal and regional media with the structural subdivision of the Corporation or its organization authorized for interaction with the mass media;

send, without comment or distortion, appeals (information) from mass media representatives to structural subdivisions and/or employees of the Corporation or its organization who are authorized to interact with the mass media;

when preparing public presentations aimed at an external audience, Corporation's IRD are used to create and design presentations.

#### **14. Compliance with the Code**

14.1. This Code shall apply to all areas of activity of the Corporation and its organizations. All IRD of the Corporation and its organizations are developed taking into account the provisions of the Code.

14.2. Employees of the Corporation and its organizations, in case of detection of signs of unethical behavior, may:

report the violation to their direct manager;

if the direct manager is involved in the violation or does not take measures to prevent the violation, report the violation via the communication channels specified in section 15 of this Code and (or) to the Ethics and Human Rights Committee.

14.3. The activities of the Ethics Committees are regulated by the relevant IRD approved by the order of the Rosatom State Corporation or the heads of the Corporation's organizations.

14.4. The Corporation and its organizations support employees who promptly inform about cases of non-compliance/violation of the Code.

14.5. Conduct that does not comply with the provisions of this Code entails liability in cases established by law and (or) the IRD of the Corporation or its organizations.

14.6. On issues related to the application of this Code, an employee may contact the HRMD.

#### **15. Reports on violations**

The Corporation and its organizations create conditions for informing about non-compliance with the provisions of this Code, as well as protecting the rights and legitimate interests of employees who have reported violations.

Employees and representatives of other interested parties can contact via the following channels:

regarding corruption, conflict of interest, involvement of a manager or other employee in activities that violate the standards of the Code, the legality of the use of property and resources: e-mail [0707@rosatom.ru](mailto:0707@rosatom.ru), toll-free phone number 8 800 100-0707; correspondence address: 24 Bolshaya Ordynka street, Moscow, 119017, or Moscow, 119017, p/o box 226, Assets Protection Department;

regarding information security issues: to the GosSOPKA Corporate Center at the e-mail address [soc@greenatom.ru](mailto:soc@greenatom.ru) , phone number +74994919 (ext. 4747) or to the Information Security Division of the Corporation;

in all other cases: by e-mail [info@rosatom.ru](mailto:info@rosatom.ru); correspondence address: 24 Bolshaya Ordynka street, Moscow, 119017, specifying the addressee “Ethics and Human Rights Committee”;

in cases of violation of human rights, including the labor rights of employees: to the Ethics and Human Rights Committee of Rosatom State Corporation, Ethics and Human Rights Committees of specific organizations of the Corporation.

## **16. Regulatory references**

- 16.1. Labor Code of the Russian Federation.
- 16.2. The Administrative Offences Code of the Russian Federation.
- 16.3. Criminal Code of the Russian Federation.
- 16.4. Federal Law No. 149-FZ "On Information, Information Technologies and the Protection of Information" dated July 27, 2006;
- 16.5. Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006.
- 16.6. Federal Law No. 317-FZ “On Rosatom State Corporation for Atomic Energy” dated December 1, 2007.
- 16.7. Federal Law No. 273-FZ “On corruption combating” dated December 25, 2008.
- 16.8. Methodological Recommendations for Development and Implementation of Corruption Prevention and Combating Measures by Organizations (the Russian Ministry of Labor, December 19, 2018).
- 16.9. Order of Rosatom State Corporation dated April 14, 2015 No. 1/364-P “On Approval of the Uniform Industry Anti-Corruption Policy of Rosatom State Corporation and its Organizations and of the Uniform Industry Guidelines for Assessing Corruption Risks at the Organizations of Rosatom State Corporation.
- 16.10. Order of Rosatom No. 1/534 P dated June 5, 2015 “On Approval of the Unified Industry Guidelines on the Definition and Application of Measures of Enforcement against Employees of the Organizations of Rosatom for Violation of Executive Discipline”.
- 16.11. Order of Rosatom State Corporation No. 1/1065-P dated November 11, 2015 "On approval of Uniform Industry Policy of Protection of Information Constituting a Commercial Secret in Rosatom State Corporation and its Organizations".
- 16.12. Order of Rosatom State Corporation No. 1/1393-P dated December 30, 2016 "On approval of Unified Industry Human Resources Policy of Rosatom State Corporation and Its Organizations".
- 16.13. Order of Rosatom State Corporation No. 1/184-P dated March 01, 2017 "On approval of Uniform Industry Procedure for the "Activity Efficiency Management" process of the employees of Rosatom State Corporation and its organizations".
- 16.14. Order of Rosatom State Corporation No. 1/778-P dated August 15, 2017 "On Approval of the Unified Industry Procedure for Personnel Recruitment, Employment and Adaptation in Rosatom State Corporation and its Organizations".
- 16.15. Order of Rosatom State Corporation No. 1/1144-P dated November 17, 2017

"On approval of the Uniform Industry-Specific Methodological Guidelines for Processing of Appeals from Individuals in Rosatom State Corporation and its Organizations".

16.16. Order of Rosatom State Corporation No. 1/1232-P dated December 05, 2017 "On approval of Unified Industry Environmental Policy of Rosatom State Corporation and Its Organizations".

16.17. Order of Rosatom State Corporation No. 1/186-P dated February 20, 2018 "On Approval of the Unified Industry Procedure for Handling Hotline Messages in Rosatom State Corporation and its Organizations".

16.18. Order of Rosatom State Corporation No. 1/504-P dated May 18, 2018 "On approval of Unified Industry Social Policy of Rosatom State Corporation and Its Organizations".

16.19. Order of Rosatom No. 1/1251-P dated November 06, 2018 "On Approval of the Unified Industry Guidelines for the Organization of the Industrial Safety Management System in the Organizations of Rosatom State Corporation".

16.20. Order of Rosatom State Corporation No. 1/1301-P dated November 27, 2019 "On approval of Unified Industry Guidelines about the Rules of Information Disclosure and Interaction of Employees of the Rosatom State Corporation and its Organizations with the Mass Media".

16.21. Order of Rosatom State Corporation dated July 27, 2020 No. 1/800-P "On approval of the Unified Industry Policy of Rosatom State Corporation and its organizations in the field of sustainable development".

16.22. Order of Rosatom State Corporation No. 1/884-P dated July 19, 2021 "On approval of Unified Industry Safety Culture Policy of Rosatom State Corporation and Its Organizations".

16.23. Order of Rosatom State Corporation No. 1/729-P dated June 15, 2022 "On Approval of Unified Industry Human Rights Policy of Rosatom State Corporation and Its Organizations".

16.24. Order of Rosatom State Corporation No. 1/1292-P dated September 30, 2022 "On approval of Unified Industry Information Security Policy of Rosatom State Corporation and Its Organizations".

16.25. Order of Rosatom State Corporation No. 1/1064-P dated June 13, 2023 "On Approval of Unified Industry Labor Protection Policy of Rosatom State Corporation and Its Organizations".