**Rosatom Central Europe Kft.**

**ORDER**

25.10.2021 No. 338/HU-01.02/36

Budapest

On approval of the Code of Ethics and Business Conduct of Employees of Rosatom Central Europe Kft.

In order to prevent risks arising from violation of the law and ethical principles of employee conduct adopted by Rosatom Central Europe Kft., Pursuant to Clause 5 of Order of State Corporation Rosatom No. 1/129-P dated 18.02.2016 and business conduct of employees of State Corporation Rosatom

IT IS HEREBY ORDERED AS FOLLOWS:

1. To approve the Code of Ethics and Business Conduct for employees of Private institution RAIN in Rosatom Central Europe Kft. (Appendix No. 1).
2. L.A. Derzhine-Koval, Chief Specialist of the Department of Operations, shall familiarize employees of Rosatom Central Europe Kft. with the Order and the Code of Ethics and Business Conduct.
3. I shall personally supervise the execution of this order.

Managing Director */signature/* Sergey Margelov

L.A. Derzhine-Koval

00 361 2011828

Appendix No. 1

to the Order of Rosatom Central Europe Kft. dated 25.10.2021

No. 338/Ni-01.02/36

CODE

of Ethics and Business Conduct of Employees

Rosatom Central Europe Kft.

Table of Contents

[**ORDER** 12](#_Toc256000000)

[25.10.2021 No. 338/HU-01.02/36 12](#_Toc256000001)

[1. Introduction 3](#_Toc256000002)

[2. Main Terms and Abbreviations 3](#_Toc256000003)

[3. Values of RCE 4](#_Toc256000004)

[Responsibility for Result 5](#_Toc256000005)

[4. Ethical conduct principles of the RCE employees 5](#_Toc256000006)

[4.1. General ethical conduct principles of the RCE employees: 5](#_Toc256000007)

[4.2. Relationship with the state 6](#_Toc256000008)

[4.3. Relationship with founders (members) of organizations and investors 6](#_Toc256000009)

[4.4. Relationship with employees 6](#_Toc256000010)

[4.5. Relationship with society and public organizations 7](#_Toc256000011)

[4.6. Relationship with counterparties and business partners 7](#_Toc256000012)

[4.7. Relations with mass media 8](#_Toc256000013)

[5. Rules of Conduct for the RCE Employees 8](#_Toc256000014)

[5.1. Anti-corruption rules 8](#_Toc256000015)

[5.2. Preservation of resources and property 9](#_Toc256000016)

[5.3. Information security 9](#_Toc256000017)

[5.4. Conflict of Interests 9](#_Toc256000018)

[Employees of RCE: 9](#_Toc256000019)

[5.5. Receiving and giving gifts, hospitality 9](#_Toc256000020)

[5.7. Labor protection, environment, nuclear, radiation and industrial safety 10](#_Toc256000021)

[5.8. Conflict situations within RCE 11](#_Toc256000022)

[5.9. Corporate image 11](#_Toc256000023)

[6. Application of the Code of Ethics 11](#_Toc256000024)

1. Introduction
   1. The Code of Ethics and Business Conduct of Employees of Rosatom Central Europe Kft. (hereinafter - the "Code of Ethics") is a document that conveys the values ​​of Rosatom Central Europe Kft. (hereinafter - "RCE"), defines the ethical principles and rules of conduct for employees based thereon, including the standards established in the applicable local regulatory acts of RCE. This Code of Ethics is not an exhaustive set of rules.
   2. The Code of Ethics aims to facilitate:

prevention of risks arising in connection with violation of legislation and ethical principles of conduct adopted in the Institution;

strengthening the business reputation of RCE and the implementation of the RCE values.

* 1. The Code of Ethics is based on the provisions of the following documents:

Federal Law No. 317-FZ dated 01.12.2007 "On State Atomic Energy Corporation Rosatom"

Federal Law of the Russian Federation No. 273-FZ dated 25.12.2008 "On Countering Corruption".

Methodological recommendations for the development and adoption by organizations of measures to prevent and combat corruption (Ministry of Labor of Russia, November 8, 2013).

IAEA Recommendations "Nuclear Law References" IAEA 2006, 2010

“Safety Guide. No. 08-(G3.5 "IAEA, 2014.

Unified Industry-Specific Anti-Corruption Policy of the State Atomic Energy Corporation Rosatom and its Companies, approved by Order of the State Corporation Rosatom No. 1/364-P dated April 14, 2015.

1. Main Terms and Abbreviations

For the purposes of this Code of Ethics, the following terms and abbreviations shall be used:

**Anti-Corruption Policy** shall mean a local regulation of RCE the mainly aimed to determine the anti-corruption principles.

**Confidentiality of Information** shall mean a mandatory requirement for a person who has gained access to certain information not to transfer such information to third parties without the consent of its owner.

**Conflict of Interest** shall refer to a situation in which the personal interest (direct or indirect) of an employee of RCE, who holds a position requiring him/her to take measures to prevent or resolve a conflict of interest, affects or may affect the proper, objective and impartial performance of official duties (exercising of powers).

**Corporation** shall mean the State Atomic Energy Corporation Rosatom.

**KPI** shall mean a key performance indicator.

**Personal Interest** shall refer, in relation to the term "conflict of interest", to the possibility of obtaining income in the monetary form, other property, including property rights, property services, deliverables or any benefits (advantages) by an employee of RCE holding the position which provides for the obligation to take measures to prevent or resolve a conflict of interest, and/or persons who are closely related or related to him/her (parents, spouses, children, brothers, sisters, as well as siblings, parents, children of spouses and spouses of children), citizens or organizations with which the specified employee and/or persons closely related or related to him/her have property or corporate or other close relations.

**Company** shall refer to a subsidiary of RCE established and registered in accordance with the laws of the country of registration

**Rotation** shall refer to a permanent or temporary change in the work function of an employee while continuing employment with the same employer, as well as the transfer of an employee to another job to another employer. It shall be carried out in the form of temporary relocation and in the form of an appointment.

**Mass Media** shall mean mass communication media

**Ethics Board** shall mean a permanent body of RCE, the main purpose of which is the assessment of the actions of the RCE employees for compliance with the provisions of the Code of Ethics.

**RCE** shall mean Rosatom Central Europe Kft.

**Ethics** shall mean a system of moral principles, norms and values ​​that

determine a person's behavior, and also offers positive or negative assessment of his/her actions, thoughts, actions.

**Ethical Assessment** shall mean the interpretation of actions/omission of the RCE employees in terms of compliance of their behavior with the standards and rules described in the Code of Ethics.

**Ethical Principles** shall mean principles, standards of business ethics and rules of business conduct described in the Code of Ethics.

1. Values of RCE

The Institution has the following values:

**One step ahead**

It is our ambition to become the leader on global markets. We are always one step ahead in technology, knowledge and qualifications of our employees. We anticipate what will happen tomorrow, and ready to face it today. We never stop developing and learning. We try to work better than we did the day before.

Responsibility for Result

Each of us bears personal responsibility for his/her deliverables and performance to the country, industry, colleagues and customers. We hold ourselves to the highest standards in our work. We do not evaluate the effort expended, but the result achieved. Successful result supports our further achievements.

**Efficiency**

We always find the best solutions. We are efficient in anything we do. To achieve the set goals, we use the company resources in the most efficient ways and keep improving work processes. Nothing can prevent us from finding the best solutions.

**Teamwork**

We are Rosatom. We have common goals.

Teamwork brings unique results. As a team, we are stronger and are able to achieve the most ambitious goals. Success of the employees is the success of the company.

**Respect**

We respect our customers, partners and suppliers. We always listen carefully and consider each other's opinion regardless of the position and place of work. We respect the industry's background and traditions. The past achievements inspire us to new victories.

**Safety**

Safety is the top priority. In our work, we first and foremost ensure absolute safety and environment security. Safety is a thing where everything is important. We know and observe safety rules, preventing any violations.

In the absence of relevant standards established by local acts of RCE, decisions shall guided by the RCE values.

1. Ethical conduct principles of the RCE employees
   1. General ethical conduct principles of the RCE employees:

compliance with the legislation of the Russian Federation, Hungary, the Czech Republic and Slovakia;

zero tolerance for violations of occupational safety and nuclear safety rules;

inadmissibility of humiliation of honor and dignity of individuals;

intolerance for corruption;

intolerance for favoritism and discrimination related to race, skin color, nationality, ethnicity, sex, age, religion and religious convictions, property, social, official, marital status, political position, membership in public associations, physical capabilities and other similar characteristics;

intolerance for any form of coercion and harassment;

inadmissibility of dissemination of deliberately false information, which discredits the honor and dignity of employees and partners or undermines their reputation.

* 1. Relationship with the state

Employees of RCE:

seek to be exemplary in the exercise of their powers to secure the interests of the state;

in their activities, they are guided by the generally recognized principles and standards of international law;

interact with public authorities and local self-government bodies, being guided by the principles of responsibility, integrity and independence;

not use their official position to influence the actions of state bodies, organizations, officials, civil servants or citizens when solving personal issues;

exercise courtesy and consideration in dealing with citizens and officials;

refrain from public statements, judgments or assessments on behalf of RCE in relation to the activities of state bodies or local self-government bodies, their leaders, unless this is a part of the official duties of employees.

* 1. Relationship with founders (members) of organizations and investors

RCE strives to increase its own investment attractiveness and strengthen its reputation in the eyes of investors. Transparency and openness are the basis for the trust in the Institution.

RCE respects the rights of all founders (members) of organizations and investors and guarantees the respect for the rights established by the legislation of the Russian Federation and local regulations of RCE.

**Employees of RCE:**

timely and in full provide the interested parties with essential information about the business of RCE through public disclosure in the prescribed manner, with the exception of restricted information.

* 1. Relationship with employees

The professionalism and involvement of the staff members are the basis for the development of RCE. RCE contributes to the prestige of work in the industry. RCE supervisors create a team environment that fosters the potential of employees.

RCE recognizes labor rights as an integral part of human rights, observes the principles of social partnership in accordance with the provisions of the RCE social policy.

**In order to develop career, the RCE employees shall:**

comply with industry values;

meet individual KPIs of 100% or higher;

be ready for rotation within RCE or between Companies, for additional workloads and work in the face of changes;

be ready to move to other regions.

* 1. Relationship with society and public organizations

The activities of RCE affect the inhabitants of the regions of its operation. RCE shall be guided by the principle of social responsibility when adopting resolutions that affect the interests of the locals.

**Employees of RCE:**

exercise tolerance and respect for the customs and traditions of peoples in the regions of RCE operation, take into account cultural and other peculiarities of various ethnic, social groups and confessions, promote inter-ethnic and inter-confessional harmony;

observe neutrality, which excludes the influence on their official activities by decisions of political parties or other public associations;

refrain from actions that could cause doubts about the objective performance by the RCE employees of their official duties or could cause conflicts damaging their reputation and the authority of RCE;

do not give preference to any professional and social groups and organizations, and remain independent from individual citizens, professional or social groups and organizations;

contribute to the development of the regions, participating in solving current issues and implementing projects for the development of the regions of the RCE operation.

* 1. Relationship with counterparties and business partners

RCE builds interaction with counterparties and business partners on an open and mutually beneficial basis, by fulfilling its obligations in full. RCE also sets high requirements to the quality of the goods and services provided, to the reliability of counterparties and business partners, and to their compliance with the rules of the business community, including anti-corruption rules.

**Employees of RCE:**

take into account the attitude of counterparties and business partners to the ethical conduct of the RCE employees;

carefully consider and promptly respond to any complaints, applications and proposals submitted to RCE and related to interaction with counterparties and business partners.

* 1. Relations with mass media

RCE constantly interacts with mass media on the principles of openness and transparency. RCE interacts with mass media through structural unit and/or duly authorized employees. Only authorized officials of RCE shall be entitled to speak to mass media and at media events.

**The RCE employees shall observe the following rules in their relations with mass media:**

not use any statements not agreed with the authorized structural unit of RCE, which can be perceived as the official position of RCE;

not transmit information or documents about the business of RCE to mass media without the consent of the authorized structural unit of RCE;

in case of speaking at a public event attended by federal or regional media, the RCE employees coordinate this speech with the authorized structural unit of RCE authorized to interact with mass media;

forward, without comment or misrepresentation, any request (information) from mass media representatives to the RCE structural units and/or employees authorized to interact with mass media;

when preparing public presentations aimed at an external audience, they abide by the Corporation rules for the preparation and design of presentations.

1. Rules of Conduct for the RCE Employees
   1. Anti-corruption rules

Anti-corruption rules in the Institution shall be implemented in accordance with the Anti-Corruption Policy.

The Institution has created and maintained an atmosphere of zero tolerance to corrupt behavior. Any corruption-related offenses shall be condemned as they threaten the fundamentals of security and efficiency.

**The Heads of RCE** shall act as guarantors of the implementation of anti-corruption rules and procedures, exemplify compliance with the anti-corruption rules and shall be personally liable for the failure to comply with the Anti-Corruption Policy in the Institution.

**Employees of RCE:**

not allow corruption or other offenses in the interests of or on behalf of RCE;

refrain from actions that could be interpreted by others as attempted commitment or participation in corruption offense in the interests of or on behalf of RCE.

* 1. Preservation of resources and property

Careful handling of property, using it only for its intended purpose, economical use of resources is an important prerequisite for the effectiveness and stability of RCE business.

**Employees of RCE:**

when planning and using resources, they choose the option that would entail minimum costs, unless this affects safety, quality and timing;

use the resources and property of RCE (including tools and equipment, vehicles and various types of communications) only for the performance of their job duties.

* 1. Information security

Violation of the confidentiality of information or violation of the procedure for handling documents containing proprietary information may damage the Institution. RCE imposes restrictions on processing such information in accordance with the law. These restrictions enable reasonable balance between transparency and respect for the business and economic interests of RCE.

**Employees of RCE:**

comply with the provisions of the documents regulating the procedure for processing restricted information, personal data of employees;

transfer proprietary information to third parties in accordance with the legislation and local regulations of RCE issued in furtherance of legislation.

* 1. Conflict of Interests

Employees of RCE:

avoid situations that lead to conflicts of interest or have signs of such conflicts;

take measures provided for by law to prevent a conflict of interest and to resolve conflicts of interest that have arisen.

* 1. Receiving and giving gifts, hospitality

Receiving and giving gifts, exercising hospitality are the signs of courtesy and respect that contribute to good business relationships, provided that they are symbolic, not intended to influence decision-making and do not give reason to see such influence.

**Employees of RCE:**

are guided by special requirements for the receipt, giving of gifts and exercise of hospitality in accordance with the legislation and the local regulations of RCE issued for such purpose.

* 1. **Work of relatives of the RCE employees**

RCE encourages the intent of the RCE employees' relatives to work in the industry. In this case, all candidates shall participate in the procedures for filling vacant positions on a general basis and shall not be given an advantage or special rights during the employment.

**Employees of RCE:**

do not influence the career decisions of their relatives working in the Institution;

do not use family ties to influence decision-making in the course of their official duties.

* 1. Labor protection, environment, nuclear, radiation and industrial safety

The protection and preservation of the environment are priority environmental objectives for RCE.

RCE implements a responsible environmental policy based on the principles of environmental management, preservation of the natural environment in areas of industrial activity and improvement of radiation monitoring systems.

RCE shall ensure safe working environment. All job-related injuries, incidents and accidents and their prerequisites shall be subject to investigation. Results of investigations shall imply decisions that exclude the recurrence of such events.

Violation of the requirements of labor protection, the environment, nuclear, radiation and industrial safety entails liability of employees in accordance with the legislation of the Russian Federation and the countries of the RCE operation.

**Employees of RCE:**

taking into account the responsibility to future generations, they find a balance between economic initiatives and vital environmental issues;

in addition to mandatory preventive measures that eliminate the risk to the population and the environment, they contribute to reduction of the adverse impact on nature, by applying their own scientific and technical developments and the best world practices in this area;

know and comply with the legislation of the Russian Federation, local regulations of RCE in the field of labor protection;

immediately stop performing any work if it may pose danger to their own life or safety of others;

start (allow other workers) to perform work only if they have appropriate job qualifications, are trained and have no medical contraindications;

provide information, provide other assistance in the investigation of job-related accidents and their prerequisites;

are disallowed from work in a state of alcoholic, drug or other intoxication, carrying, storing or distributing in any RCE premises or facilities of drugs or other substances the circulation of which is prohibited by law;

do not smoke in the RCE premises or facilities, except for specially designated areas;

immediately notify the authorized structural unit or the official of RCE about possible and existing violations of occupational safety and environmental protection rules;

have the right to the protection of confidentiality of information about the occurrence and content of such notification;

involve public environmental organizations in the discussion of planned activities in the field of nuclear energy, in terms of environmental protection and environmental safety;

promote the environmental culture, environmental education, upbringing, and the RCE employees and public awareness of the location of nuclear facilities.

* 1. Conflict situations within RCE

RCE shall take the necessary actions to reduce the risks of conflicts and disputes between the employees of RCE.

RCE recognizes the importance of pre-trial settlement of internal conflicts and seeks to resolve all disputes through negotiations with employees.

When a conflict situation arises or appears within the framework of RCE, the RCE employees shall contact the immediate supervisor or the HR Unit.

* 1. Corporate image

Each employee contributes to the corporate image of RCE. An employee's appearance and behavior influences the perception of the industry by public.

**Employees of RCE:**

when interacting with representatives of stakeholders, they observe generally accepted rules of politeness and business communication;

when representing RCE, they refrain from behavior and statements that damage the public image of RCE;

when choosing clothes, they are guided by the generally accepted rules of a business dress code based on the principles of restraint, grooming and cleanliness.

1. Application of the Code of Ethics

This Code of Ethics shall apply to all activities of RCE. All internal regulatory documents shall be developed taking into account the provisions of the Code of Ethics.

The head of the Human Resources Department of RCE shall be responsible for updating the Code of Ethics and monitoring its implementation. All amendments shall be made in accordance with the procedure established in the Institution.

Adherence to the provisions of the Code of Ethics does not replace the need to compliance with the legislation of the Russian Federation and Hungary where RCE operates. In the event of a conflict between the Code of Ethics and the law, the requirements of the law shall prevail.

The most important tool for ensuring the compliance with the Code of Ethics is the employee's internal self-assessment, moral evaluation on the part of his/her manager and colleagues. The Institution has no hierarchical barriers when it comes to violations of legal and ethical standards.

When formulating complaints about violations of the provisions of the Code of Ethics, the RCE employees shall follow the following procedure:

remind the violator that violation of the provisions of the Code of Ethics is unacceptable and require him or her to stop these actions;

in case of no effect, report the violation to their immediate supervisor;

if the immediate supervisor is involved in the violation or takes no measures to suppress the violation, report the violation of the provisions of the Code of Ethics by contacting the Ethics Board.

The Ethics Board shall be governed by the Regulations approved by the Order of the RCE President.

The Institution prohibits prosecution or punishment of employees for complains related to violations of this Code of Ethics by other employees.

For failure to comply with this Code of Ethics, the RCE employees may be brought to disciplinary and other legal liability in cases of violation of the requirements stipulated in accordance with this Code of Ethics by local regulations of RCE.

For information on application of this Code of Ethics, an employee may contact the Human Resources Department of RCE.