

State Enterprise
«National Nuclear Energy Generating Company «Energoatom»
SE «NNEGC «ENERGOATOM»

APPROVED:
President of SE «NNEGC
«Energoatom»
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ANTI-CORRUPTION PROGRAMME
of SE «NNEGC «ENERGOATOM»

ПМ-Д.0.34.621-23 [PM-D.0.34.621-23]

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TERMS AND DEFINITIONS

The following terms and definitions referred to in the Anti-Corruption Programme are used only in that Programme and for the purpose thereof.

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| Business relations | relations between the Company and a business partner associated with business, professional or economic activities of the Company arising on the basis of a legal transaction or other activities of the Company and providing for the continuing existence after their establishment |
| Business hospitality | representative events (e.g. business breakfasts, lunches, dinners, buffet receptions, tastings), other events (conferences, cultural and sporting events), reimbursement of travel, accommodation and other types of expenses incurred by or in relation to the Company for the purpose of establishing or establishing business relations or for any other purpose related to the Company's activities |
| Business partners | legal entities and/or individuals with whom the Company maintains, enters into or intends to enter into business relations |
| Incentive payments | unofficial and illegal payments to officials to facilitate/accelerate/simplify or, in certain cases, properly perform statutory procedures that the Company is legally entitled to receive without making such payments |
| Anti-Corruption Commissioner | an official of the Company in the current structure and staffing table, who is responsible for implementation of the Anti-Corruption Programme of SE «NNEGC «Energoatom» and is appointed to the position according to the Part 1 of Article 64 of the Law of Ukraine «On Prevention of Corruption». |
| Corruption risk | a probability of an event of corruption or a corruption-related offense, other violation of the Law of Ukraine «On Prevention of Corruption» that will have negative impact in the Company's performance |
| Unlawful benefit | money or other property, benefits, privileges, services, intangible assets, any other benefits of an intangible or non-monetary nature that are offered, promised, provided or received without legal grounds |
| Zero tolerance to corruption | zero tolerance for corruption in any of its manifestations |

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Public official

a person authorised to perform the functions of the state or local self-government, in accordance with clause 1 of Part 1 of Article 3 of the Law of Ukraine «On Prevention of Corruption»;

a person who is equated to persons authorised to perform the functions of the state or local self-government in accordance with clause 2 of Part 1 of Article 3 of the Law of Ukraine «On Prevention of Corruption»;

an executive support service employee in accordance with Article 92 of the Law of Ukraine “On Public Service”;

a candidate for President of Ukraine and a candidate for a people’s deputy of Ukraine registered in line with the procedure established by law;

an executive, other official of a economic company in which the state or municipal share exceeds 50 per cent;

an official of a foreign state (a person holding a position in a legislative, executive or judicial body of a foreign state, including jurors, other persons performing state functions for a foreign state, in particular for a state authority or state enterprise);

a foreign arbitrator, a person authorised to resolve civil, commercial or labour disputes in a foreign country in a procedure alternative to a court;

an official of an international organization (an employee of an international organization or another person authorized by such organization to act on its behalf);

a member of the international parliamentary assembly, to which Ukraine is a participant;

a judge and an official of an international court

Unit (responsible person) for the prevention and countering of corruption of a Company’s Separate Subdivision (SS)

a structural unit or an employee of a SS of the Company that ensure taking measures to prevent and combat corruption at a SS

Company’s officials

President, First Vice President–Technical Director, vice Presidents, Inspector General-Director for Safety, Chief Accountant, Directors General/Directors of SS and their deputies, Anti-Corruption Commissioner, and other employees of the Company who are defined as officials according to the Company’s Charter

Representative of a Company

a person authorised in accordance with the established procedure to act on behalf of or in the interests of the in the relationship with third parties

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PREAMBLE

Being aware of the responsibility to promote the values of the rule of law and integrity, striving to ensure its sustainable development, taking care of its own business reputation, to encourage the use of fair commercial practices, the State Enterprise «The National Nuclear Energy Generating Company «Energoatom» (hereafter SE «NNEGС «Energoatom», Company) proclaims by this Anti-Corruption Programme that Company's officials and employees are governed by the principle of zero tolerance for the corruption in any of its forms and manifestations and take (will take) any measures to prevent, reveal and combat corruption as envisaged by law and this Anti-Corruption Programme in their activities, as well as in legal relations with business partners, public authorities, local governments, other legal entities and individuals.

The Company declares its principled position and condemns corruption as an illegal and unethical way of doing business.

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1 GENERAL PROVISIONS

1.1 This Anti-Corruption Programme of SE «NNEGC «Energoatom» ПМ-Д.0.34.621-23 was developed to substitute the Anti-Corruption Programme of SE «NNEGC «Energoatom» ПМ-Д.0.34.621-20 to ensure functioning of the effective system of corruption prevention and combatting, compliance of the Company's activity with the anti-corruption legislation in view of the best international practices.

1.2 This Anti-Corruption Programme is a document of the management system of SE «NNEGC «Energoatom», which covers the focus area «Anti-Corruption Activity», Code: 1.10.50 as per classification of the enterprise standard SOU NNEGC 180:2020 «Organization of management processes. Classifier of focus areas of SE «NNEGC «Energoatom» activities».

1.3 This Anti-Corruption Programme is a set of measures (rules, standards and procedures) for prevention, detection, and combatting of corruption within the Company's activity.

Should the legislation be amended, this Anti-Corruption Programme will apply to the extent permitted by applicable laws.

In the event of organizational changes in the Company, the Anti-Corruption Programme will apply having regard to organizational & administrative documents identifying the name and re-distribution of functions and powers among officials and structural units within the Company's Head Office and its separated subdivisions.

1.4 This Anti-Corruption Programme is developed with taking into account of the requirements set forth by:

- Law of Ukraine No.1700-VI «On Prevention of Corruption», dated 14.10.2014;
- Standard Anti-Corruption Programme of a Legal Entity approved by Order No.794/21 dated 10.12.2021 of the National Agency on Corruption Prevention and registered under No. 1702/37324 with the Ministry of Justice of Ukraine on 31.12.2021;
- International Standard ISO 37001:2018 «Anti-bribery Management Systems – Requirements with Guidance for Use»;
- Compliance Policy of SE «NNEGC «Energoatom»;
- Code of Corporate Ethics of SE «NNEGC «Energoatom».

1.5 The Anti-Corruption Programme shall be binding upon officials, employees, representatives of the Company and persons, who are trained by the Company or perform certain work under civil law contracts concluded with the Company.

1.6 The Anti-Corruption Programme shall be applied in all areas of the Company's activity, including in relations with business partners, public officials, governmental authorities and local self-government bodies, other legal entities and individuals.

1.7 Provisions for mandatory compliance with the Anti-Corruption Programme are included in employment contracts and internal labour regulations of the Company's Head Office and SS, and may be included in the contracts concluded by the Company.

1.8 After the Anti-Corruption Programme has been discussed with the Company's employees, it is approved by the President of the Company and shall be put into effect by his order.

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1.9 The text of this Anti-Corruption Programme shall be made publically accessible on the Company's official website in subsection «Corruption Prevention» of the section «About us».

1.10 The Anti-Corruption Commissioner shall be responsible for maintaining this Anti-Corruption Programme.

1.11 The Anti-Corruption Programme shall be kept in the Production Document Fund of the Head Office (original counterpart) and in the Company's SS (controlled copy).

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2 LEADERSHIP, BUSINESS REPUTATION AND INTEGRITY

2.1 The Company's management and officials at all levels performing management functions in the Company shall undertake to set a personal example of ethical behaviour and to promote zero tolerance to corruption among the Company's employees, which is the basis of the business culture, day-to-day business practice and business reputation of the Company.

2.2 The President of the Company shall undertake to demonstrate his leadership and responsibility for:

- 1) compliance with the anti-corruption legislation;
- 2) ensuring proper implementation, efficient performance, periodic analysis, timely review and improvement of the corruption prevention and anti-corruption system within the Company to properly respond to the corruption risks in the Company's activities;
- 3) promoting the culture of «zero tolerance» to corruption manifestations across all areas of the Company's operation;
- 4) appointment of the Anti-Corruption Commissioner to the position, ensuring his/her appropriate material and organization work conditions, facilitating the performance of his/her tasks and functions provided for in the Law of Ukraine «On Prevention of Corruption» and in the Anti-Corruption Programme, ensuring independence of the Anti-Corruption Commissioner's activity;
- 5) incentivizing all-level officials to demonstrate their leadership in preventing and countering corruption, within the area of their competence;
- 6) encouraging the employees to support the Company's anti-corruption policy and personally contribute to the performance of the system of corruption prevention and countering;
- 7) informing of the policy on prevention and countering of corruption both in the Company at large and in its relationships with business partners, public officials, state government authorities, local self-governments, and other legal entities and individuals;
- 8) ensuring, in compliance with the Law of Ukraine «On Prevention of Corruption», of conditions for reporting on the possible facts of corruption or corruption-related offences and other violations of the Law of Ukraine «On Prevention of Corruption»;
- 9) observance of rights and guarantees of protection of whistleblowers envisaged by the Law of Ukraine «On Prevention of Corruption»;
- 10) timely and proper response in line with applicable law to the fact of commission (possible commission) of corruption or corruption-related offences by the officials at all levels and by the employees of the Company.

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3 STANDARDS OF PROFESSIONAL ETHICS

3.1 When performing their functional (representative) powers, the Company's management, officials, employees, representatives and the Anti-Corruption Commissioner shall:

- 1) strictly comply with generally recognized ethical standards of conduct, the requirements of the Code of Corporate Ethics and the Compliance Policy of the Company;
- 2) be tolerant and respectful of the political views, ideological and religious beliefs of other persons;
- 3) act, regardless of personal interests, personal attitude towards any persons, their political, ideological, religious or other personal views or beliefs;
- 4) not disclose or use confidential information that became known to them in connection with the performance of their functional duties, except in cases established by law;
- 5) competently, timely, efficiently and responsibly fulfill their functional duties, decisions and instructions of the bodies and officials to whom they are subordinate, accountable or controlled, and do not allow abuse and inefficient use of the Company's funds and property.

3.2 The Company's management, officials, employees, representatives and the Anti-Corruption Commissioner shall refrain from explicitly criminal actions, decisions and instructions and take measures to cancel such decisions or instructions.

3.3 The Company's management, officials, employees, representatives and the Anti-Corruption Commissioner shall refrain from carrying out explicitly criminal decisions or orders of management.

3.4 If officials, employees, representatives and the Anti-Corruption Commissioner receive any decisions or instructions for execution which are explicitly criminal, they shall immediately notify thereof their immediate supervisor or the President (Director General (Director) of SS) of the Company, as well as the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS).

3.5 A Company's official, employee, and Anti-Corruption Commissioner cannot be fired or forced to be fired, brought to disciplinary responsibility or subjected to other negative measures of influence or the threat of such measures of influence on the part of the management in connection with the refusal to comply with the decisions or instructions of the management, which are explicitly illegal.

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4 PROHIBITED CORRUPT PRACTICES

4.1 The Company's management, officials, employees and representatives shall be prohibited from:

1) accepting an offer, a promise or receiving an unlawful benefit, and requesting such a benefit for themselves or for another individual or legal entity for performing or failing to perform any acts by using their positions at the Company or in connection with their activities for the benefit of the Company, either in the interests of those who are offering, promising or providing such a benefit, or in the interests of a third party;

2) abusing their powers by intentionally using their powers against the interests of the Company to obtain an improper benefit for themselves or for another individual or legal entity;

3) offering, promising or providing an unlawful benefit (directly or through a third party) to officials and/or their close persons, other individuals, for performing or failing to perform any acts/omission by using their entrusted powers, official status, authority to obtain or retain any advantage for the Company;

4) doing acts or making decisions in the context of a real conflict of interest;

5) using any property or funds of the Company for personal purpose;

6) organizing, intermediating or personally making any cash or non-cash payments or settlements with the Company's business partners, other individuals or legal entities, when and if such payments or settlements are not envisaged by laws or contracts concluded by the Company;

7) influencing, directly or indirectly, the decisions of the Company's employees in order to obtain an unlawful benefit for themselves or others;

8) doing any acts that directly or indirectly incite other employees to violate the requirements of the Law of Ukraine «On Prevention of Corruption» and/or this Anti-Corruption Programme;

9) making and receiving gifts in violation of the requirements of the laws and this Anti-Corruption Programme as related to offering and accepting the gifts and business hospitality;

10) after dismissal or any other termination of collaboration with the Company, they are prohibited from disclosing or otherwise using for their interest the information, including confidential information, which became known to them as they exercised their powers, performed contractual obligations, except as may be provided by law.

4.2 The Company shall prohibit the making of incentive payments to any officials and business partners, including those aimed at expediting any formal procedures related to obtaining permits or making respective decisions in favour of the Company, or gaining other advantages for the Company.

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5 FUNDAMENTAL RIGHTS AND RESPONSIBILITIES OF THE COMPANY'S EMPLOYEES

5.1 The Company's management, officials, employees and representatives have the right to:

- 1) propose improvements to this Anti-Corruption Programme;
- 2) request the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) to provide consultations and clarifications regarding the compliance with the requirements of anti-corruption laws, this Anti-Corruption Programme and the Company's internal documents adopted in pursuance of thereof;
- 3) receive recommendations from the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) regarding further actions if and when planned actions or decisions may be a source of corruption risks.

5.2 The Company's management, officials, employees and representatives are obliged to:

- 1) comply with the requirements of the Law of Ukraine «On Prevention of Corruption», this Anti-Corruption Programme and the Company's internal documents adopted in pursuance of this Programme, and to provide the implementation of this Anti-Corruption Programme;
- 2) perform their functional responsibilities taking into account the legitimate interests of the Company;
- 3) immediately inform (within 24 hours) the Anti-Corruption Commissioner (Head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) and/or the President of the Company (General Director/Director of SS) of the events of any violation of the requirements of this Anti-Corruption Programme, possible commission of corruption or corruption-related offenses, other violations of the Law of Ukraine «On Prevention of Corruption» by the Company's officials, employees, representatives or by existing or potential business partners;
- 4) report the occurrence of a real or potential conflict of interest in the manner prescribed by this Anti-Corruption Programme and the internal documents adopted in pursuance of that Programme; take actions to prevent and resolve a real or potential conflict of interests; avoid any actions or decision-making in the context of a real conflict of interests.

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6 LEGAL STATUS, RIGHTS AND RESPONSIBILITIES OF THE ANTI-CORRUPTION COMMISSIONER AND THEIR SUBORDINATES EMPLOYEES

6.1 The legal status of the Anti-Corruption Commissioner is defined by the Law of Ukraine «On Prevention of Corruption» and this Anti-corruption Programme.

The Anti-Corruption Commissioner shall be appointed by the President of the Company under the Labor Laws and pursuant to the Charter of SE «NNEGС «Energoatom».

The Anti-Corruption Commissioner shall reports, be accountable to and controlled by the President of the Company.

The requirements for a person eligible for appointment as an anticorruption commissioner shall be specified according to the Law of Ukraine «On Prevention of Corruption».

The Anti-Corruption Commissioner may be early dismissed from the office to the extent permitted by the Law of Ukraine «On Prevention of Corruption».

The Anti-Corruption Commissioner may be dismissed from the office upon the initiative of the President of the Company, subject to approval by the National Agency on Corruption Prevention in accordance with the procedure prescribed by laws.

6.2 For the purposes of this Anti-Corruption Programme, upon the motion of the Anti-Corruption Commissioner, anti-corruption subdivisions, subordinated to that Commissioner, may be organized (with relevant responsible persons being appointed) at the Company’s Head Office and at the Company’s SS in accordance with the procedure applicable within the Company.

Any changes to the Company’s staffing table, which concern the unit (responsible persons) organized (appointed) for the purpose of implementing this Anti-Corruption Programme shall be made as agreed upon with the Anti-Corruption Commissioner.

6.2.1. Any appointment (dismissal) of employees subordinated to the Anticorruption Commissioner, and unit (responsible persons) for the prevention and countering of corruption of SS, as well as imposition of disciplinary liability on such employees, shall be performed in accordance with the procedure applicable within the Company, as agreed upon with the Anti-Corruption Commissioner.

6.2.2. The structural unit of the Head Office, organized for the purpose of implementing this Anti-Corruption Programme, shall ensure the implementation of corruption prevention measures at the Company within the functions entrusted to the Anti-Corruption Commissioner, and shall directly report to that Commissioner and directly report to the Company’s President.

6.2.3. Units for the prevention and countering of corruption of SS, organized for the purpose of implementing this Anti-Corruption Programme, shall ensure the implementation of corruption prevention measures at the Company’s separate subdivisions within the entrusted functions.

Units for the prevention and countering of corruption of SS shall directly report to General Directors (Directors) of the Company’s SS and shall be under operational control of the Anti-Corruption Commissioner.

6.2.4. Responsible persons in charge of corruption prevention and countering at SS,

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appointed for the purpose of implementing this Anti-Corruption Programme, shall provide the implementation of corruption prevention measures at the Company's SS within the entrusted functions.

Responsible persons in charge of corruption prevention and countering at SS shall be appointed in accordance with the Company's applicable procedure as prescribed by orders of the President of the Company (General Directors (directors) of the Company's SS).

Responsible persons in charge of corruption prevention and countering at SS shall directly report to General Directors (Directors) of the Company's SS and shall be under operational control of the Anti-Corruption Commissioner.

6.3 The Anti-Corruption Commissioner may engage other employees of the Company in fulfilling his/her functions related to implementing this Anti-Corruption Programme, subject to approval by their managers.

6.4 The Anti-Corruption Commissioner is obliged to:

- 1) perform his/her duties without bias or prejudice;
- 2) organize, develop and submit for approval to the Company's President any internal documents of the Company concerning the matters of elaborating and implementing this Anti-Corruption Programme;
- 3) arrange and conduct a periodic evaluation of corruption risks in the Company's activities;
- 4) maintain interactions and provide coordination between the Head Office's structural divisions and the Company's separated subdivisions in preparing, implementing and monitoring the progress status of measures stipulated by this Anti-Corruption Programme;
- 5) provide the Company's employees with clarifications and individual consultations related to implementing this Anti-Corruption Programme and fulfilling the requirements of anti-corruption laws;
- 6) provide the Company's employees with methodological assistance and consultations regarding the reports revealing possible facts of corruption and corruption-related offences, other violations of the Law «On Prevention of Corruption» and whistleblower protection;
- 7) participate in informing the public of the corruption prevention measures being implemented by the Company;
- 8) ensure the organization of the training and advanced training of the Company's employees in the area of corruption prevention and countering;
- 9) improve his/her knowledge and skills, and to undergo professional training;
- 10) take measures in order to detect a conflict of interests and to contribute to its settlement;
- 11) secure, as prescribed by the Company's applicable procedure, the organization of periodic declarations of the information on whether the Company's employees have/have no conflict of interests;
- 12) take part in recruitment procedures at the Company and to contribute, within the competence, to selecting the job candidates during introductory briefing on corruption prevention, and, where applicable, to prepare conclusions regarding the presence/absence of

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corruption risks;

13) organize and conduct anti-corruption checks of business partners of the Company as prescribed by the Company's applicable procedure;

14) check, where applicable, for the presence of corruption risks, and to concur (endorse) draft organizational & administrative documents and the Company's transactions in due course;

15) carry out, where applicable, checks of legal entities (merger and acquisition objects) checking their compliance with the anti-corruption measures system, established within the Company, in accordance with the procedure prescribed by law;

16) organize the operation of internal channels for reporting on possible corruption and corruption-related offences, other violations of the Law of Ukraine «On Prevention of Corruption»;

17) make arrangements for review and verification of possible facts of corruption and corruption-related offences, other violations of the Law of Ukraine «On Prevention of Corruption»;

18) initiate the conduct of internal investigations of possible facts of corruption and corruption-related offences, other violations of the Law of Ukraine «On Prevention of Corruption», to participate in such internal investigations, including those, which have been already launched either upon recommendation of a special commissioner in the area of corruption countering or by order of the National Agency on Corruption Prevention;

19) immediately inform, within 24 hours, in writing, the special commissioners in the area of corruption countering, within the competence specified by the laws, in case of own detection of corruption and corruption-related offences or receipt of a report about commitment of such offences by the Company's employees;

20) cooperate with whistleblowers and secure, within the competence, that their rights and guarantees of protection, which are provided for in the Law of Ukraine «On Prevention of Corruption», will be exercised and provided.

21) perform a fact-checking to verify whether subjects of declaration have filed their declarations, and to notify the National Agency on Corruption Prevention about any late or non-filing of such declarations in accordance with the procedure prescribed by laws;

22) make arrangements for making and maintaining the registers keeping records of:

- the Company's employees held liable for committing a corruption or corruption – related offence, another breach of the Law of Ukraine «On Prevention of Corruption»;
- completed anti-corruption checks of business partners;
- completed internal investigations;
- received reports about a conflict of interests and actions on their settlement;
- received and reviewed reports revealing possible facts of corruption and corruption-related offences, other violations of the Law of Ukraine «On Prevention of Corruption»;
- others (where applicable);

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23) ensure the supervision and monitoring of the Company's employees to check their compliance with requirements of anti-corruption laws and this Anti-Corruption Programme;

24) assess outcomes of the implemented measures that are provided for by this Anti-Corruption Programme;

25) provide the preparation of a consolidated report on the progress status of this Anti-Corruption Programme;

26) participate in collaboration with the state authorities, local self-government bodies, other legal entities, non-governmental and/or international organizations addressing the issues of corruption prevention;

27) perform other professional duties as provided by the Law of «On Prevention of Corruption», this Anti-Corruption Programme and the Company's internal documents adopted in pursuance thereof.

6.5 The Anti-corruption Commissioner shall have the right to:

1) receive written or oral clarifications from the managers and other employees of the Company's Head Office and Separate Subdivisions, the Company's representatives, the compliance with requirements of the Law of Ukraine «On Prevention of Corruption» and this Anti-corruption Programme;

2) call and inquire the Company's officials and employees when verifying the information provided in a report revealing possible facts of corruption and corruption-related offences, other violations of the Law of Ukraine «On Prevention of Corruption»;

3) obtain, when exercising the powers, from managers and employees of the Company's Head Office and SS the information, documents (copies) also including documents containing the restricted information (except for the state secrets);

4) process the information including but not limited to personal data, subject to adhering to the law on personal data protection;

5) initiate checking and internal investigations on the grounds provided for by the Law of Ukraine «On Prevention of Corruption» and this Anti-Corruption Programme;

6) get an access to warehouse, production and other premises of the Company's Head Office and Separate Subdivisions when carrying out, within the powers, checks, internal investigations, anti-corruption measures, and so on;

7) get, when exercising the powers, an access to the Company's available electronic means of data storage and processing or to the information retrieved from such means, which is issued in paper form;

8) send, within the competence, requests, letters, notifications to the state authorities and local self-government bodies, as well as enterprises, agencies, institutions and entities of all forms of ownership;

9) supervise, when exercising the powers, the activities of units (responsible persons) for the prevention and countering of corruption of SS, to assign them with a task (instruction) and to demand its fulfilment;

10) elect, among the employees of the subordinated structural division, a person to be responsible for carrying out the mandate of an Anti-Corruption Commissioner in charge of

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protection of whistleblowers;

11) initiate before the President the imposition of disciplinary liability on the Company's employees guilty of violating the Law of Ukraine «On Prevention of Corruption», this Anti-Corruption Programme and internal document adopted in pursuance thereof;

12) take part in meetings of working groups and the Company's committees to address the matters falling within the competence of the Anti-Corruption Commissioner;

13) call for meetings to address the matters of corruption detection and countering, and this Anti-Corruption Programme implementation;

14) put before the Company's President any propositions on improvements of the Anti-Corruption Commissioner's activities, his/her subordinated structural unit, anti-corruption units (responsible persons) for the prevention and countering of corruption of SS;

15) approach the President of the Company in the matters of exercise of his/her powers;

16) other rights stipulated by the Law of Ukraine «On Prevention of Corruption», this Anti-Corruption Programme, the Collective Agreement, the Anti-Corruption Commissioner's job description, and the Company's internal documents.

6.6 Rights and responsibilities of the employees of a structural unit subordinated to the Anti-Corruption Commissioner, as well as powers of units (responsible persons) for the prevention and countering of corruption of SS, shall be set forth in the Company's internal documents to be developed by the Anti-Corruption Commissioner.

6.7 The Anti-Corruption Commissioner shall be independent in exercising his/her functions at the Company. Interference in the Anticorruption Commissioner's activities from the Company's management, officials, employees, representatives of the Company, business partners and other persons shall not be allowed.

6.7.1 «Interference» means:

1) refusing to provide the Anti-Corruption Commissioner with the information, documents and an access thereto while the Commissioner is exercising his/her powers;

2) any influence on the Anti-Corruption Commissioner's decision-making and/or acts, which is made by a person exerting such influence beyond the powers provided by laws, the Charter of SE «NNEGC «Energoatom» or the Company's internal documents;

3) acts/omissions that result in any restriction and/or infringement of the Anti-Corruption Commissioner's rights and prevent the Anti-Corruption Commissioner from performing his/her professional duties;

4) imposing the obligations on the Anti-Corruption Commissioner, loading him/her with assignments on the matters, which do not fall within/go beyond the limits of his/her powers envisaged by the Law of Ukraine «On Prevention of Corruption» and this Anti-Corruption Programme, and restraining the exercise of his/her powers.

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7 CORRUPTION RISKS MANAGEMENT

7.1 To effectively prevent corruption in its activities, the Company shall apply a risk-based approach and create a risk management system that provides for conducting regular evaluations of corruption risks, which may affect the Company's activity, for implementing the measures, which would be necessary and sufficient for elimination or minimization of such risks, for their subsequent monitoring and control, and for updating the current anti-corruption measures in view of the changes in the internal and external environment of the Company's activities.

7.2 The Company shall regularly assess corruption risks in its activities in order to:

- 1) identify any corruption risks in the business processes of the Company;
- 2) evaluate whether the existing measures are sufficient, relevant and effective so that they can properly prevent, mitigate or minimize any detected corruption risks;
- 3) analyze and measure (specify the levels) the detected corruption risks;
- 4) identify any highly risky business processes taking account of the nature and vulnerability of business processes to corruption risks, levels of the assessed corruption risks;
- 5) elaborate the measures to effectively mitigate or minimize risks in the Company's activities.

7.3 The Anti-Corruption Commissioner shall organize a regular corruption risks assessment in the Company's activities.

The procedure for organizing, carrying out the assessment of corruption risks in the Company's activities, formalizing and implementing its results shall be defined by a relevant document of the Company to be developed by the Anti-Corruption Commissioner.

7.4 The Company may conduct internal and/or external corruption risks assessments.

An internal corruption risk assessment shall be performed by the working group for assessment of corruption risks in the activities of SE «NNEGC «Energoatom» (hereinafter the "Working Group") that is formed engaging the representatives of structural units of SE «NNEGC «Energoatom» Head Office and the Company's Separate Subdivisions.

The Working Group's operating procedure shall be specified by the Company's internal document to be developed by the Anti-Corruption Commissioner.

The membership of the Working Group shall be subject to approval by the President of the Company upon recommendation of the Anti-Corruption Commissioner.

An external corruption risk assessment may be performed by auditing, law, consulting firms engaged by the Company or by third-party experts.

7.5 The Company shall assess corruption risks in its activities at least once every 2 years.

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8 AWARENESS-BUILDING ACTIVITIES

8.1 The Company shall adequately and properly provide awareness of the provisions of the Company's Anti-Corruption Programme and its internal documents on corruption prevention and countering, as well as amendments to anti-corruption laws and their application practices, to the Company's officials, employees, representatives and business partners by way of notification.

8.2 In order to build an appropriate level of the anti-corruption culture among the Company's officials, employees and representatives, the Anti-Corruption Commissioner shall ensure that they are made duly aware, as a mandatory condition, of the provisions of the Law of Ukraine «On Prevention of Corruption», this Anti-corruption Programme and the Company's internal documents adopted in pursuance thereof, by carrying out an introductory briefing on corruption prevention.

The procedure for organizing and conducting such introductory briefing on corruption prevention shall be specified by the Company's internal document to be developed by the Anti-Corruption Commissioner.

8.3 The Company shall provide regular training and advanced training to the Company's management, officials, employees of the Company, the Anti-Corruption Commissioner and, where applicable, representatives of the Company.

The procedure for the training and advanced training in the area of corruption prevention and detection shall be specified by the Company's internal document to be developed by the Anti-Corruption Commissioner.

8.4 Scheduled training and advanced training in corruption prevention and detection shall be carried out according to the annual time-schedule to be compiled by the Anti-Corruption Commissioner and approved by the President of the Company.

8.5 The topics and forms of training (seminars, lectures, workshops, training sessions, one-one-one coaching, webinars, and etc.) shall be selected subject to:

- 1) legislative amendments;
- 2) findings of progress monitoring/assessment of the Anti-Corruption Programme;
- 3) findings of regular corruption risks assessment;
- 4) findings of the completed checks and internal investigations;
- 5) suggestions made by the Company's management, officials and employees of the Company;

8.6 In order to assess the retention level of educational information, the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a SS), where applicable, shall carry out the testing of individuals after their training in corruption prevention and detection.

8.7 The Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) shall keep records of the activities on advanced training (the training) in corruption prevention and detection.

8.8 If any question arises as regards the content or the procedure for implementing

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specific provisions of anti-corruption laws and/or this Anti-Corruption Programme, the Company's management, officials and employees and representatives may request the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a SS) to provide a written or oral clarification or further consultations.

8.9 Within 10 calendar days, the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a SS) shall provide clarifications or a consultation on the matters of fulfilling the requirements of anti-corruption laws and/or this Anti-Corruption Programme, and the Company's internal documents adopted in pursuance of this Programme.

8.10 The Anti-Corruption Commissioner shall post most frequently requested clarifications (consultations) regarding the compliance with the requirements of anti-corruption laws and or this Anti-Corruption Programme, on the resources publicly accessible to the Company's employees, on the Company website, and/or shall disseminate them by corporate electronic communication means.

8.11 The Anti-Corruption Commissioner may use other forms of providing any clarifications and consultations regarding the compliance with requirements of anti-corruption laws and/or this Anti-Corruption Programme, the Company's internal documents adopted in pursuance thereof (quick reference cards, booklets, video address, on-line broadcasting, and so on).

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9 PREVENTION AND RESOLUTION OF A CONFLICT OF INTERESTS

9.1 The Company seeks to protect against the adverse impact of conflicts of interest on the interests of the Company, as well as the interests of its business partners, by preventing, identifying, and resolving such situations.

9.2 The Company prevents and resolves conflict of interest situations based on the following principles:

- 1) openness – mandatory informing by employees of the Company about situations that have signs of a conflict of interest;
- 2) legality – preventing the occurrence of conflicts of interest;
- 3) individuality - individual approach when considering and evaluating each case that has signs of a conflict of interest.

9.3 Employees of the Company are obliged, no later than the next working day from the date when they found out or should have found out a real or potential conflict of interest, to notify thereof their immediate head and the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) in writing, not to take actions and not to make decisions under the conditions of a real conflict of interest and take measures to address the real or potential conflict of interest.

In the event of a real or potential conflict of interests of the President of the Company, the President shall notify thereof the Anti-Corruption Commissioner and the governing body in writing.

In the event of a real or potential conflict of interests of the Anti-Corruption Commissioner, the Anti-Corruption Commissioner shall notify thereof the President of the Company in writing.

In the event of a real or potential conflict of interests of the Director General (Director) of a Separated Subdivision, the Director shall notify thereof the President of the Company and the Anti-Corruption Commissioner in writing.

In the event of a real or potential conflict of interests of the head of the unit (responsible person) for the prevention and countering of corruption in the Separated Subdivision, such person shall notify thereof the Anti-Corruption Commissioner and the Director General (Director) of the Company's Separated Subdivision in writing.

The President, employees, and representatives of the Company can apply to the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) for clarification (consultation) on preventing and/or resolving conflicts of interest.

9.4 The person's immediate head shall, within two working days after receiving a notice of a real or potential conflict of interests of a subordinate employee, decide on the way to resolve a conflict of interest taking into account the recommendations of the Anti-Corruption Commissione (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) and inform the employee about it.

9.5 An immediate head, who has become aware of a conflict of interests of a subordinate employee, is obliged to take measures to prevent and resolve a conflict of interests (including

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in the case when the head discovered an existing conflict of interests of a subordinate employee without any notice from this employee).

9.6 A conflict of interests shall be resolved by taking one of the following measures (separately or in combination):

1) suspension of a employee from fulfilling the task, performing actions, making decisions or participation in making decisions under the conditions of a real or potential conflict of interest;

2) use of external monitoring to control how a person fulfils a certain task, performs certain actions or makes decisions;

3) restricting a employee's access to certain information;

4) reviewing the scope of a employee's official powers;

5) reassignment of a employee to another position;

6) termination of employment of a person.

9.7 The Company's employees can independently take steps to resolve it by eliminating the respective private interest and providing documents that prove it to their immediate head and the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS).

The President of the Company can independently take steps to resolve it by eliminating the respective private interest and providing documents that prove it to the governing body and the Anti-Corruption Commissioner.

The Anti-Corruption Commissioner can independently take steps to resolve it by eliminating the respective private interest and providing documents that prove it to the President of the Company.

The Director General (Director) of the Company's Separated Subdivision can independently take steps to resolve it by eliminating the respective private interest and providing documents that prove it to the President of the Company and the Anti-Corruption Commissioner.

The head of the unit (responsible person) for the prevention and countering of corruption in the Separated Subdivision can independently take steps to resolve it by eliminating the respective private interest and providing documents that prove it to the Director General (Director) of the Separated Subdivision and the Anti-Corruption Commissioner.

9.8 The procedure for using the measures of resolution of a conflict of interests in the Company shall be determined by the Company's internal document to be developed by the Anti-Corruption Commissioner.

9.9 In the event of a real or potential conflict of interest for an employee of the Company who is a member of the commission and/or working group, a written notice shall be submitted to the relevant commission and/or working group. The Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) shall be informed.

9.10 An employee of the Company who is a member of the commission and/or working group, and who has a conflict of interest during the resolution of the issue by such a collegial

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body, shall be prohibited from:

- 1) participating in the preparation of documents for decision-making on such an issue;
- 2) participating in the consideration (discussion) of such an issue;
- 3) voting for the adoption/non-adoption of a decision on such an issue.

9.11 If the non-participation of a member of the commission and/or working group who has a conflict in resolving the issue by such a collegial body leads to the loss of the competence of this body, the participation of such an employee of the Company in the collegial decision-making shall be carried out under external control. The decision to exercise external control shall be made by a collegial body.

External control shall be carried out through the participation of the Anti-Corruption Commissioner (employee of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) in the work of the commission and/or working group in the status of an observer without the right to vote.

9.12 The procedure for preventing and resolving conflicts of interest in the activities of the Company's employees shall be determined by the Company's internal document to be developed by the Anti-Corruption Commissioner.

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10 INTERACTION WITH BUSINESS PARTNERS

10.1 The Company shall strive to cooperate with business partners who carry out their activities legally and ethically, interaction with which does not carry corruption risks for the Company.

10.2 The Company shall inform business partners about the principles and requirements in the field of preventing and combating corruption, which are provided for by this Anti-Corruption Programme, and other policies developed for its implementation, including by posting relevant information on the official website of the Company.

10.3 The Company shall check potential and existing business partners.

10.3.1 Verification of the Company's business partners shall be carried out to:

1) check the business reputation of a business partner for tolerance to corruption, in particular, whether the business partner has the reputation of an entity whose activities are related to corruption;

2) check whether a business partner has an anti-corruption programme (or other anti-corruption policies), implemented mechanisms for its implementation, its readiness to comply with the Company's anti-corruption principles and requirements, as well as anti-corruption legislation;

3) identification of possible corruption risks in connection with the conclusion (execution) of a transaction.

10.3.2 The Anti-Corruption Commissioner (employee of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) shall ensure the conduct of an anti-corruption check of potential and existing business partners of the Company.

The procedures of anti-corruption checks of potential and existing business partners of the Company, the frequency of its implementation, and the criteria for selecting business partners shall be determined depending on the scope and place of activity, the structure of the Company, the nature and level of corruption risks that may arise in relations with a business partner.

Other structural divisions of the Company may be involved in conducting an anti-corruption checks of potential and existing business partners.

10.3.3 The procedure for conducting an anti-corruption checks of the Company's business partners shall be determined by the Company's internal document to be developed by the Anti-Corruption Commissioner.

10.3.4 Agreements (contracts) that the Company enters into with business partners shall include anti-corruption clauses under the standard forms of anti-corruption clauses to be developed by the Anti-Corruption Commissioner.

10.4 The procedure for including anti-corruption clauses in agreements (contracts) that the Company enters into with business partners shall be determined by the Company's internal document.

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11 BUSINESS HOSPITALITY POLICIES AND PROCEDURES. GIFTS

11.1 The Company shall determine the general policy and procedures for providing and accepting business hospitality and gifts, taking into account the requirements of anti-corruption legislation.

11.2 The Company's management, officials, employees, and representatives of the Company shall refrain from giving gifts to officials, their close persons, potential or current business partners, and their employees (representatives), except for gifts presented within the limits of generally recognized ideas about hospitality.

11.3 Giving and receiving gifts by the Company's management, officials, employees, and representatives of the Company within the limits of generally recognized ideas about hospitality shall be allowed, provided that all of the following criteria are met:

1) they do not have the purpose of influencing the objectivity of any decision, including the conclusion of transactions, provision or receipt of services, information, etc.;

2) they are not a hidden unlawful benefit;

3) they correspond to generally accepted ideas about hospitality;

4) they are not prohibited by law (the law of the state in which they are given or received);

5) the cost of which does not exceed the limits established by law and this Programme;

6) disclosure of such a gift will not create a risk to the business reputation of the Company or the gifted person;

7) they are reasonable, non-proportionate, and relevant in the context of generally accepted ideas about hospitality.

11.4 It shall not be allowed to give or receive gifts in the form of money (cash or non-cash), or cash equivalent (gift cards or gift vouchers).

11.5 If there are doubts about the acceptability of the gift, the Company's management, officials, employees, and representatives of the Company can ask for advice or explanations from the Anti-Corruption Commissioner (employee of the unit (responsible person) for the prevention and countering of corruption of a Company's SS).

11.6 The procedure for giving and receiving gifts by the Company's management, officials, employees, and representatives of the Company shall be determined by the Company's internal document to be developed by the Anti-Corruption Commissioner.

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12 REPORTING ON POSSIBLE FACTS OF CORRUPTION OR CORRUPTION-RELATED OFFENSES, AND OTHER VIOLATIONS OF THE LAW OF UKRAINE «ON PREVENTION OF CORRUPTION». MECHANISMS FOR ENCOURAGING AND GUARANTEEING THE PROTECTION OF WHISTLEBLOWERS

12.1 The Company shall organize work with reports on possible facts of corruption or corruption-related offenses, and other violations of the Law of Ukraine «On Prevention of Corruption» (hereinafter referred to as the Reports) under the requirements of the legislation on the following principles:

- awareness - knowledge of possible channels of making Reports and the persons authorized to review them;
- accessibility - unhindered access for making Reports, ensuring the convenience of the process of submitting them;
- efficiency - respond to all Reports without exception;
- transparency - awareness of the results of reviewing Reports;
- protection - awareness of whistleblowers about their rights and guarantees of protection, including labor rights;
- adaptability - implementation of mechanisms for encouraging and creating a culture of Reports;
- analysis and study – systematic review and adjustment of the organization of work with Reports and whistleblowers.

12.2 The Company shall provide whistleblowers with conditions for making Reports by:

- 1) mandatory creation and maintenance of internal channels through which a person can make Reports, including anonymously;
- 2) definition according to the Law of Ukraine «On Prevention of Corruption» of internal procedures and mechanisms for receiving and reviewing Reports;
- 3) providing methodological assistance and advice on making Reports;
- 4) implementation of mechanisms for promoting and building a culture of Reports;
- 5) observing labor rights and guarantees of protection of whistleblowers.

12.3 The Company shall create internal channels for making Reports.

Information about internal channels for making Reports shall be posted on the official website of the Company and brought to the attention of all employees of the Company by the Anti-Corruption Commissioner (employee of the unit (responsible person) for the prevention and countering of corruption of a Company's SS), including during the introductory briefing on preventing corruption.

12.4 Whistleblowers shall independently determine which channels to use for making Reports.

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12.5 Whistleblowers shall be guaranteed confidentiality under the procedure and conditions defined by the Law of Ukraine «On Prevention of Corruption».

12.6 The Reports shall contain factual data confirming the possible commission of a corruption or corruption-related offense by the Company's employee(s) or other violations of the Law of Ukraine «On Prevention of Corruption», which can be verified.

12.7 Reports can be made without specifying authorship (anonymously).

12.8 An anonymous Report shall be subject to review if the information provided in it concerns a specific person, and contains factual data that can be verified.

12.9 The Company shall create favorable conditions for whistleblowers and build respect for whistleblowers as part of the Company's business culture.

12.10 The whistleblower shall have the rights and guarantees of protection provided for in Articles 53³ – 53⁸ of the Law of Ukraine «On Prevention of Corruption», in particular:

- 1) to receive confirmation of acceptance and registration of the Reports;
- 2) confidentiality;
- 3) to submit evidence to support the Reports;
- 4) to receive information about the status and results of consideration, verification, and/or investigation based on the fact of the information reported by him/her;
- 5) to get explanations on the rights and guarantees of protection, including labor rights;
- 6) to be exempted from legal liability for making Reports, and dissemination of the information specified in the Reports, except in cases of deliberately false Reports;
- 7) other rights and guarantees provided for by anti-corruption legislation to protect whistleblowers.

12.11 The rights of a whistleblower shall arise from the moment of making a Report that contains factual data confirming the possible commission of a corruption or corruption-related offense, or other violation of the Law of Ukraine «On Prevention of Corruption», which can be verified.

12.12 The Anti-Corruption Commissioner (employee of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) within the limits of his/her powers, shall provide information to employees of the Company about the rights and guarantees of protection of whistleblowers by conducting explanatory work, including during the introductory briefing on corruption prevention, training events on anti-corruption topics, as well as by distributing memos and providing consultations on these issues.

12.13 It shall be prohibited to disclose information about the identity of the whistleblower, his/her close persons, or other data that can identify the identity of the whistleblower, his/her close persons, to third parties who are not involved in the consideration, verification and/or investigation of the facts reported by him/her, as well as to persons whose actions or omissions relate to the facts reported by him/her, except for cases established by law.

12.14 The whistleblower may not be dismissed or forced to dismiss, brought to disciplinary responsibility, subjected to other negative measures of influence, or threatened with such measures of influence in connection with his/her Reports.

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12.15 The rights and guarantees of protection of whistleblowers shall apply to close persons of the whistleblower.

12.16 The management and officials of the Company, the Anti-Corruption Commissioner (employee of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) within the limits of their powers, shall provide conditions for the protection of whistleblowers.

12.17 Mechanisms for encouraging whistleblowers and forming a culture of making Reports among the Company's employees shall be determined by the Company's internal document to be developed by the Anti-Corruption Commissioner.

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13 PROCEDURE FOR REVIEWING REPORTS, CONDUCTING VERIFICATIONS AND INTERNAL INVESTIGATIONS

13.1 Reports shall be subject to preliminary verification if the information contained therein contains verifiable factual data on the possible commission of a corruption or corruption-related offence or other violation of the Law of Ukraine «On Prevention of Corruption».

13.1.1 In the event of receipt of a Report relating to the actions or inaction of the President of the Company, such Report shall be sent by the Anti-Corruption Commissioner without preliminary verification within 3 (three) calendar days to the entity authorised to review or investigate such facts, taking into account the investigative jurisdiction determined by Article 216 of the Criminal Procedure Code of Ukraine and the provisions provided for in Article 255 of the Code of Ukraine on Administrative Offences, and a copy of the relevant letter shall be sent to the National Agency for Corruption Prevention, if it is not the entity authorised to review the information; and the person who reported the facts shall be informed.

The information received shall also be sent by the Company to the governing body.

13.1.2 In the event of receipt of a Report concerning actions or inaction of the Director General (Director) of a Company's SS, a preliminary verification of such Report shall be carried out by the Anti-Corruption Commissioner in accordance with the requirements of the Law of Ukraine «On Prevention of Corruption» and internal documents of the Company.

13.1.3 In the event of receipt of a Report concerning actions or inaction of the Anti-Corruption Commissioner and/or their subordinate employees, the preliminary verification of such information shall be carried out in accordance with the requirements of the Law of Ukraine «On Prevention of Corruption» and internal documents of the Company.

13.1.4 In the event of receipt of a Report concerning actions or inaction of employees of unit (responsible person) for the prevention and countering of corruption of a Company's SS), a preliminary verification of such information shall be carried out in accordance with the requirements of the Law of Ukraine «On Prevention of Corruption» and internal documents of the Company, and the Anti-Corruption Commissioner shall be informed thereof.

13.1.5 If during the preliminary verification of the Report it has been established that it does not comply with the requirements of the Law of Ukraine «On Prevention of Corruption», further investigation of such report shall be carried out in accordance with the procedure established by law for investigation of citizens' appeals or requests for information, and the person who made the report shall be informed thereof.

13.1.6 If during the preliminary verification of the Report it is established that it does not fall within the competence of the Company, any further reviewing of such a Report shall be terminated, and the person who made the Report shall be informed thereof, with simultaneous explanation of the competence of the body or legal entity authorised to review or investigate the facts set forth in the Report.

13.2 The preliminary verification of the Report shall be carried out within ten working days from the date of its registration in accordance with the procedure established by the Law of Ukraine «On Prevention of Corruption», this Anti-Corruption Programme and internal documents of the Company adopted for its implementation.

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13.2.1 Within the framework of the preliminary verification of the Report, the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) shall:

- receive oral and written clarifications from the Company's employees;
- receive oral or written clarifications and other documents (copies thereof) on the essence of the reported events from the person who made the Report (if such person's contact information is available);
- peruse, study and receive in accordance with the established procedure the necessary available documents and materials (copies thereof).

13.2.2 Employees of the Company's Head Office and SSs (contributors) may be involved in the preliminary verification of the Report upon agreement with the President (Director General (Director) of the Company's SS).

The contributors involved in the verification of the Report shall submit their conclusions, proposals and other materials at the request of the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) within a specified period of time.

13.2.3 Based on the results of the preliminary verification of the Report, the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) shall, in particular, make the decisions to:

- 1) take measures to stop the identified violation;
- 2) apply disciplinary sanctions (disciplinary measures) to the guilty persons;
- 3) initiate an internal investigation into the substance of the information reported if the facts set out in the Report have been corroborated or if any further clarification of their reliability is required;
- 4) in case of detection of signs of a corruption or corruption-related offence, immediately, within 24 hours, notify in writing the special authorised anti-corruption entity or the State Bureau of Investigation of its commission;
- 5) conclude the preliminary verification in case of failure to corroborate the facts stated in the Report.

13.3 The person who made the Report shall be informed of the results of the preliminary verification within the terms and procedure established by the Law of Ukraine «On Prevention of Corruption» and the Company's internal documents.

13.4 The preliminary verification of the facts of possible corruption or corruption-related offences, other violations of the Law of Ukraine «On Prevention of Corruption», independently identified by the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS), shall be carried out in accordance with the procedure established by the Law of Ukraine «On Prevention of Corruption» and internal documents of the Company.

13.5 The procedure for reviewing and preliminary verification of Reports shall be determined by an internal document of the Company developed by the Anti-Corruption Commissioner.

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13.6 The purpose of the internal investigation of the Report is to verify the factual data on the possible commission of a corruption offence or a corruption-related offence, or other violation of the Law of Ukraine «On Prevention of Corruption».

13.7 Any internal investigation of the Report shall be instituted by the President of the Company (Director General (Director) of the Company's SS) at the initiative of the Anti-Corruption Commissioner and conducted by the commission in accordance with the procedure established by the Company's internal document.

An internal investigation of a Report may be instituted without a preliminary verification.

13.7.1 The commission shall include the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) and/or employees of their subordinate structural divisions, except when the investigation has been instituted as a result of discovery of facts or information relating to these persons.

13.7.2 All officials and employees of the Company, regardless of their position, shall be obliged to facilitate the conduct of an internal investigation and provide the necessary available materials and documents (copies thereof).

13.7.3 An official or employee of the Company subject to an internal investigation may be temporarily suspended from work (if there are grounds provided for by law) or otherwise restricted in access to material, information and other resources of the Company for the duration of the internal investigation based on a decision of the President of the Company (Director General (Director) of the Company's SS).

13.7.4 Based on the results of the internal investigation, the following decisions are made, in particular:

- 1) take measures to stop the identified violation;
- 2) apply disciplinary sanctions (disciplinary measures) to the guilty persons;
- 3) identify ways to eliminate the causes and conditions of the violation and the consequences caused by it, and take measures to prevent such violations in the future;
- 4) if any signs of a criminal offence have been found, transfer the materials to the pre-trial investigation body or other bodies authorised to respond to the offences.

13.7.5 The duration of the internal investigation shall not exceed thirty calendar days. If it is not possible to verify the reported information within the specified period of time, the President of the Company (Director General (Director) of the Company's SS) shall extend the period of the internal investigation to forty-five calendar days.

13.7.6 The person who made the Report shall be informed of the results of the internal investigation within the terms and procedure established by the Law of Ukraine «On Prevention of Corruption» and the Company's internal documents.

13.7.7 The Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) shall have access to the materials of the internal investigation during the period of their storage.

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14 SUPERVISION AND CONTROL OVER COMPLIANCE WITH THE ANTI-CORRUPTION PROGRAMME LIABILITY FOR VIOLATIONS

14.1 The Anti-Corruption Commissioner shall supervise the adherence to this Anti-Corruption Programme by the Company's management, officials, employees and representatives of the Company.

14.2 For violation of the provisions of this Anti-Corruption Programme, the Company's employees shall be subject to disciplinary measures provided for by the labour legislation and internal documents of the Company.

14.3 Control over the implementation of this Anti-Corruption Programme shall be exercised by the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) by means of:

1) reviewing reports of possible facts of corruption or corruption-related offences, other violations of the Law of Ukraine «On Prevention of Corruption»;

2) conducting verifications of compliance with this Anti-Corruption Programme of the Company's employees;

3) declaring periodically information on the presence/absence of a conflict of interest in accordance with the procedure established by the Company;

4) approving (signing) draft regulatory, production, organisational & administrative documents of the Company, as well as transactions of the Company in accordance with the established procedure;

5) periodic monitoring of the implementation of this Anti-Corruption Programme;

6) other powers provided for by this Anti-Corruption Programme and internal documents of the Company.

14.4 The procedure for conducting scheduled and unscheduled verifications of compliance with this Anti-Corruption Programme of the Company's employees shall be determined by an internal document of the Company developed by the Anti-Corruption Commissioner.

14.5 Reports (including anonymous ones) on possible violations of this Anti-Corruption Programme containing verifiable factual data shall be reviewed by the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) in accordance with the procedure established by the Company.

14.6 In case of corroboration of the facts of violation of the requirements of this Anti-Corruption Programme, the Anti-Corruption Commissioner (head of the unit (responsible person) for the prevention and countering of corruption of a Company's SS) initiates the disciplinary action before the President of the Company (Director General (Director) of the SS of the Company) in accordance with the procedure established by the Company.

14.7 In case of detection of facts of possible commission of a corruption or corruption-related offence or any other violation of the Law of Ukraine «On Prevention of Corruption» during supervision or control over compliance with this Anti-Corruption Programme or when reviewing a report on possible violations of the requirements of this Anti-Corruption Programme, the Anti-Corruption Commissioner (head of the anti-corruption unit (responsible

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person) for the prevention and countering of corruption of a Company's SS) initiates an internal investigation before the President of the Company (Director General (Director) of the Company's SS) in accordance with the procedure set out in subsection 13.7 of this Anti-Corruption Programme and internal documents of the Company.

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15 REPORTING ON THE IMPLEMENTATION OF THE ANTI-CORRUPTION PROGRAMME

15.1 The Anti-Corruption Commissioner shall submit to the President of the Company a summary report on the results of monitoring the implementation of this Anti-Corruption Programme (hereinafter referred to as the Summary Report) in the form determined by the Anti-Corruption Commissioner, at least once every six months. The annual assessment of the results of the implementation of measures provided for by this Anti-Corruption Programme shall be equivalent to such a report.

15.2 The Summary Report includes information on:

- 1) the status of implementation of the measures set out in this Anti-Corruption Programme;
- 2) the results of implementation of the measures set out in this Anti-Corruption Programme;
- 3) detected violations of the Law of Ukraine «On Prevention of Corruption» and of this Anti-Corruption Programme, measures taken to eliminate such violations and prevent them in the future;
- 4) number of verifications and internal investigations conducted and their results;
- 5) facts of violation of guarantees of the Anti-Corruption Commissioner's independence;
- 6) the status of implementation of measures aimed at eliminating or minimising corruption risks;
- 7) training activities on corruption prevention and detection;
- 8) cooperation with whistleblowers.

The report may contain other information related to the implementation of this Anti-Corruption Programme.

15.3 The generalised results of monitoring the implementation of this Anti-Corruption Programme shall be placed in the general public domain for the Company's employees and on the Company's official website.

15.4 The Anti-Corruption Commissioner shall ensure that an assessment of the results of implementation of the measures provided for in this Anti-Corruption Programme is conducted at least once a year.

15.5 The results of the assessment shall be summarised by the Anti-Corruption Commissioner in a written report submitted to the President of the Company.

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16 PROCEDURE FOR REVISIONS OF THE ANTI-CORRUPTION PROGRAMME

16.1 The Anti-Corruption Commissioner shall ensure setting up of feedback mechanisms and other internal processes aimed at the support and continuous improvement of the Anti-Corruption Programme.

16.2 This Anti-Corruption Programme may be reviewed in the following cases:

1) based on the results of:

- assessment of corruption risks in the Company's activities;
- supervision and control over compliance with this Anti-Corruption Programme, as well as assessment of the results of implementation of the measures provided for by it;

2) in case of amendments to the legislation, including anti-corruption legislation;

3) in case of changes in the organisational structure and/or business processes of the Company.

16.3 Amendments to this Anti-Corruption Programme may be initiated by the Anti-Corruption Commissioner, the Company's management, officials and employees.

16.4 Proposals for amendments to this Anti-Corruption Programme shall be submitted to the Anti-Corruption Commissioner, who shall study and systematise them.

16.5 The Representative shall ensure that proposals for amendments to this Anti-Corruption Programme are summarised and discussed with the employees.

16.6 If the Company's employees approve the proposals for amendments to this Anti-Corruption Programme, the relevant amendments, which are an integral part of this Anti-Corruption Programme, shall be approved by the President of the Company.

