



# REPORT

on the annual assessment of the  
results of the implementation

**OF THE ANTI-CORRUPTION  
PROGRAM MEASURES**

for 2024

Kyiv 2025

Anti-Corruption Commissioner



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## INTRODUCTION

JSC "NNEGC "Energoatom" was established through the transformation of the state enterprise "National Nuclear Energy Generating Company "Energoatom" by the Law of Ukraine "On Joint Stock Company "National Nuclear Energy Generating Company "Energoatom".

According to the Charter of the Joint Stock Company "National Nuclear Energy Generating Company "Energoatom", the company is a state joint-stock company, a legal entity of private law, and a private joint-stock company.

In its internal activities and legal relations with business partners, state authorities and local governments, JSC "NNEGC "Energoatom" is guided by the principle of zero tolerance for any manifestations of corruption and takes all measures provided by law to prevent, detect and combat corruption.

Continuing the experience of previous years, in 2024 the Company took actions to prevent and detect corruption, eliminate the preconditions for its occurrence and fully support the implementation of government measures aimed at ensuring transparency and openness in public administration.

The Anti-Corruption Program is the Company's key document on the formation and implementation of anti-corruption policy.

The Company's Anti-Corruption Program was first adopted in June 2015 and updated in 2017 and 2020. The current version of the Anti-Corruption Program 2023 was developed considering the international standard ISO 37001, the outcomes of external and internal assessments of corruption risks in the Company's activities, and the practice of implementing anti-corruption procedures by the person responsible for implementation the Anti-Corruption Program.

This document, in particular, sets out the provisions on leadership and responsibility of the executives in the field of combating corruption, defines the fundamental provisions for protecting and maintaining the Company's positive business reputation and integrity principles, identifies the main anti-corruption measures and procedures, formalizes the hospitality policy, and defines the functions of the person responsible for implementation the Anti-Corruption Program.

The Anti-Corruption Program is mandatory for all the Company's employees and other persons acting on behalf of the Company within the framework of contracts (agreements) concluded with them.

Under the current anti-corruption legislation appointed a person responsible for implementation the Company's Anti-Corruption Program: the Anti-Corruption Commissioner - head of the department for ensuring activities in the field of corruption prevention.

## ANTI-CORRUPTION COMMISSIONER

The functional responsibilities of the Anti-Corruption Commissioner - head of the department for ensuring activities in the field of corruption prevention (hereinafter referred to as the Anti-Corruption Commissioner) are defined by the Company's Anti-Corruption Program and the Anti-Corruption Commissioner's position description, the key of which are:

- ✓ ensuring the formation and implementation of measures to prevent and combat corruption in the Company, as well as control over their implementation;
- ✓ ensuring supervision, control, and monitoring of compliance by the Company's employees with anti-corruption legislation, the Anti-Corruption Program, production, regulatory, organizational, and administrative documents of the Company on preventing and combating corruption;
- ✓ organizing and participating in the periodic assessment of corruption risks in the activities of JSC "NNEGC "Energoatom".

In 2024, the Anti-Corruption Commissioner's activities were organized by the department for ensuring activities in the field of corruption prevention, which consisted of five people and was directly subordinated to them.

The Anti-Corruption Commissioner's operational management includes units (responsible persons) for the prevention and countering of corruption in the Company's branches. These units ensure the organization of anti-corruption activities at the Company's branches within the defined competence.

ANTI-CORRUPTION COMMISSIONER – HEAD OF THE DEPARTMENT FOR ENSURING ACTIVITIES  
IN THE FIELD OF CORRUPTION PREVENTION

THE DEPARTMENT FOR ENSURING ACTIVITIES IN THE FIELD OF CORRUPTION PREVENTION

UNITS FOR THE PREVENTION AND COUNTERING OF CORRUPTION OF THE COMPANY'S  
BRANCHES

BRANCH "SS "ZAPORIZHZHIA NPP"; BRANCH "SS "RIVNE NPP"; BRANCH "SS "KHMELNYTSKY  
NPP"; BRANCH "SS "SOUTH UKRAINE NPP"; BRANCH "SS "EMERGENCY TECHNICAL CENTER"

RESPONSIBLE PERSONS FOR THE PREVENTION AND COUNTERING OF CORRUPTION:

BRANCH "SS "WAREHOUSING"; BRANCH "SS "ATOMREMONTSERVICE"; BRANCH "SS  
"SCIENTIFIC & TECHNICAL CENTER"; BRANCH "SS ATOMPROJECTENGINEERING"; BRANCH  
"SS "ATOMENERGOMASH"; BRANCH "SS "ADMINISTRATIVE DEPARTMENT"; BRANCH  
"SS "CENTRALIZED PROCUREMENT"; BRANCH "SS "ENERGOATOM-TRADING".

## GENERAL INFORMATION ON REPORTING

The Anti-Corruption Program is the key document of JSC "NNEGC "Energoatom" on the formation and implementation of the anti-corruption policy, which defines a set of rules, standards and procedures for detecting, combating and preventing corruption in the Company's activities.

To ensure the proper implementation of the measures set out in the Anti-Corruption Program, JSC "NNEGC "Energoatom" has separate operational documents that regulate in more detail:

- functions and rights of the person responsible for the implementation of the Anti-Corruption Program;
- the procedure for assessing corruption risks;
- the procedure for preventing and resolving conflicts of interest;
- peculiarities of introductory briefing on corruption prevention;
- hospitality policy;
- the procedure for conducting training and up-grading on preventing and combating corruption;
- the procedure for reviewing reports of possible violations of anti-corruption legislation and the Anti-Corruption Program;
- protection of whistleblowers, mechanisms for encouraging whistleblowers, and creating a culture of reporting possible violations of anti-corruption legislation;
- other anti-corruption measures implemented in the Company.

The implementation of such activities, as well as oversight of their performance during the reporting period, was ensured in due order by the Anti-Corruption Commissioner, employees of their subordinate department, as well as heads of units (responsible persons) for the prevention and countering of corruption of the Company's branches.

The Anti-Corruption Commissioner shall prepare reports and inform the Company's Acting CEO on the realization of the implemented anti-corruption activities as required by Section 15 of the Anti-Corruption Program.

Following the provisions of subsections 15.4 and 15.5 of the Anti-Corruption Program, the Anti-Corruption Commissioner has conducted an annual assessment of the results of the implementation of the Anti-Corruption Program measures and has prepared this report.

## CORRUPTION RISK MANAGEMENT

In framework of implementation of Section 7 of the Anti-Corruption Program, JSC "NNEGC "Energoatom" has introduced a risk management system providing for regular assessment of corruption risks that may affect the Company's activities, taking measures necessary and sufficient to eliminate or minimize them, their further monitoring and control, as well as updating existing anti-corruption activities under changes in the internal and external environment of the Company's activities.

Following the requirements of part 2 of Article 61 of the Law of Ukraine "On Prevention of Corruption", the regular internal assessment of corruption risks in the Company's activities was conducted in 2023.

As part of the measures to prevent and eliminate (minimize) corruption risks in 2024, the Anti-Corruption Commissioner:

✓ has submitted proposals to amend the Instruction on the Procedure for Organizing and Conducting Procurement of Goods, Works and Services at SE "NNEGC "Energoatom" under the Open Tendering Procedure to include in the tender documentation for procurement, the cost of which is equal to or exceeds UAH 20 million, the requirement for the participant of the procurement procedure to provide a letter of consent as part of the tender proposal that, if determined as the winner of the procurement procedure, it will provide a copy of the anti-corruption program and a document confirming the appointment of an authorized person for the implementation of the anti-corruption program when concluding the procurement contract. The proposals have been taken into account in the amendments to the mentioned Instruction;

✓ has provided proposals for updating the wording of anti-corruption clauses included in contracts concluded by the company. The proposals have been taken into account in the new version of the Regulation on the procedure for concluding and maintaining agreements (contracts);

✓ has submitted proposals to amend the Regulation on the procedure for citizens' appeals to the Company in terms of determining the procedure and timeframe for sending notifications to the Anti-Corruption Commissioner about alleged corruption or corruption-related offenses, other violations of the Law of Ukraine "On Prevention of Corruption" received as citizens' appeals. The proposals have been taken into account in the new version of the Regulation on the procedure for consideration of citizens' appeals to JSC "NNEGC "Energoatom".

## AWARENESS-BUILDING ACTIVITIES

As part of the implementation of anti-corruption measures set out in Section 8 of the Anti-Corruption Program, JSC "NNEGC "Energoatom" ensured proper and sufficient communication of the provisions of the Anti-Corruption Program and the Company's internal documents on preventing and combating corruption, changes in anti-corruption legislation and its application, in particular, by holding:

- ✓ introductory briefing on corruption prevention:

Over the reporting period the Company's employees were familiarized with the main provisions of anti-corruption legislation and the Anti-Corruption Program during the introductory briefing on corruption prevention subject to subsection 8.2 of the Anti-Corruption Program.

Over the reporting period such briefings were held for over 2400 people, namely:

- applicants for employment at the Company;
- persons authorized to act on behalf of the Company;
- authorized persons responsible for organizing and conducting procurement/simplified procurement procedures in the Company and members of relevant working groups.

During the introductory briefing on corruption prevention, employees were provided with instruction sheets on the basics of the Company's anti-corruption policy, legal status, rights and guarantees of whistleblower protection, etc;

- ✓ training and up-grading on preventing and combating corruption

In the reporting period, training and up-grading on preventing and combating corruption were organized and conducted for the Company's employees by the scheduled plan of training activities on preventing and combating corruption and under sections 8.3 - 8.5 of the Anti-Corruption Program.

The Anti-Corruption Commissioner prepared and brought to the attention of the employees of the Company's Head Office presentations on the following topics:

- "The Company is connected to the Unified Whistleblower Reporting Portal" (in June);
- "Integrity and ethical standards of employees as an element of the corporate culture of JSC "NNEGC "Energoatom" (in December).

In total, during the reporting period, the Anti-Corruption Commissioner and the units (responsible persons) for the prevention and countering of corruption of the branches held 88 training events for over 22 thousand of the Company's employees to explain the requirements of anti-corruption legislation and the Anti-Corruption Program (lectures, presentations, e-learning courses, etc.).

A separate area of outreach activities within the framework of the implementation of the measures set out in Section 8 of the Anti-Corruption Program

is up-grading in preventing and combating corruption. To this end, the Anti-Corruption Commissioner and employees of the department for ensuring activities in the field of corruption prevention participated in such events:

- webinar "ESG and Anti-Corruption Compliance" hosted by KPMG (in March);
- webinar "Best Corporate Governance Practices and Minimizing Corporate Fraud Risks. How the Management of State-Owned and Private Enterprises Will Change" hosted by LIGA ZAKON Academy (in April);
- the fourth annual conference "Whistleblowers in Ukraine: Advances and Challenges" hosted by the National Agency on Corruption Prevention (hereinafter referred to as NACP) and ACREC (in July);
- webinars "International Standards on Public Integrity: Introducing", "Political Commitment to Integrity, Division of Responsibilities and Anti-Corruption Strategy", and "Leadership, Merit and Capacity Development" hosted by the National Agency of Ukraine on Civil Service jointly with NACP, Organisation for Economic Co-operation and Development and with the support of USAID and Pro-Integrity (in November);
- training "From transparency inside to trust outside: shaping the reputation of the business and the state in the international context" hosted by UNIC jointly with USAID and Pro-Integrity (in December).

The Anti-Corruption Commissioner and employees of the department for ensuring activities in the field of corruption prevention took part in public discussions of legislative initiatives of NACP, which were held within the framework of the implementation of the State Anti-Corruption Program for 2023-2025 (online), in particular, regarding the following drafts:

- a draft law on establishing administrative liability for violation of restrictions after termination of public service, violation of requirements for transfer of enterprises and corporate rights to management by public servants, as well as failure to take measures to resolve conflicts of interest (in March);
- a draft law on improving the provisions of anti-corruption legislation in terms of restrictions on concurrent employment and combination with other types of activity (in April);
- a draft Procedure for conducting logical and arithmetic control of the declaration of a person authorized to perform state or local government functions (in May);
- a draft law on strengthening guarantees of the NACP independence in terms of providing it with highly qualified and honest personnel based on the results of the competitive procedure (in June);
- a draft order of the NACP on amendments to the Procedure for selecting declarations of persons authorized to perform state or local government functions for a full audit and the priority of such audit based on risk assessment (in July);



- a draft law on amendments to the Criminal Procedure Code of Ukraine to optimize the procedure for carrying out some procedural actions (in November);
- a draft law on amendments to the Code of Ukraine on Administrative Offenses to ensure that officials and service personnel take appropriate measures to combat corruption (in December).

Over the reporting period, additional outreach activities on corruption prevention were carried out for employees of the Head Office and branches of the Company (in October), in particular,

- The Anti-Corruption Commissioner:
  - approved the program of unscheduled briefing on corruption prevention for employees of JSC "NNEGC "Energoatom" and the program of additional training on corruption prevention for executives of all management layers of JSC "NNEGC "Energoatom";
  - conducted an unscheduled briefing on corruption prevention for high-level executives of the Company's Head Office at a conference call;
  - conducted lectures for 183 executives of all management layers of the Company's Head Office with a presentation of the theoretical module of additional training on corruption prevention and subsequent verification of the knowledge gained;
- heads of units (responsible persons) for the prevention and countering of corruption in the Company's branches:
  - have ensured the conducting of unscheduled briefings on corruption prevention for employees of the branches;
  - have provided additional training on corruption prevention for executives of all management layers of branches by approved Programs.

✓ clarification and informing:

During the year, in framework of implementation of subsections 8.1, 8.8 - 8.11 of the Anti-Corruption Program, the Anti-Corruption Commissioner and the units (responsible persons) for the prevention and countering of corruption of the branches provided clarifications to the Company's employees on compliance with the requirements of anti-corruption legislation and the Anti-Corruption Program.

In total, during the reporting period, the Anti-Corruption Commissioner and the units (responsible persons) for the prevention and countering of corruption in the branches provided over 400 consultations.

In order to ensure openness and simplified access to information about the Company's anti-corruption activities, during the year, the Anti-Corruption Commissioner posted useful information in the sub-section "The Anti-Corruption Commissioner" on the Company's Corporate Knowledge Portal and published 4 materials on the official website of JSC "NNEGC "Energoatom".

## **PREVENTION AND RESOLUTION OF CONFLICT OF INTERESTS**

In framework of implementation of Section 9 of the Anti-Corruption Program, JSC "NNEGC "Energoatom" has defined a system of measures to prevent, timely identify, and resolve conflicts of interest.

The mechanism for preventing and resolving conflict of interests is one of the anti-corruption measures implemented in the Company to ensure integrity and, as a result, minimize the potential risks of corruption related to the possible influence of private interests on the performance of official duties by the Company's employees.

When applying for a position at the Company, candidates for a position fill out an "Information sheet on the presence/absence of a conflict of interests".

The executives of all management layers of the Company's Head Office and branches annually submit such information sheets as part of the periodic declaration of information on the presence/absence of a conflict of interests.

Over the reporting period, the Anti-Corruption Commissioner and heads of units (responsible persons) for the prevention and countering of corruption of the branches ensured the analysis and summarization of the information contained in the information sheets of the Company's employees and took appropriate measures to prevent and resolve conflict of interests.

During 2024, 125 conflicts of interests in the activities of employees of the Company's Head Office and branches were resolved based on the results of the measures taken by the Anti-Corruption Commissioner and heads of units (responsible persons) for the prevention and countering of corruption of the branches.

## INTERACTION WITH BUSINESS PARTNERS

Preventing corruption and promoting integrity in the Company's current operations is a priority and a key prerequisite for attracting investments to restore Ukraine's energy infrastructure.

Ensuring transparency of business activities, and compliance with the norms and rules of business ethics and law are among the basic values declared in the Company's Policy Statement and Anti-Corruption Program. JSC "NNEGC "Energoatom" cooperates with business partners who endorse the declared values of the Company.

As part of the implementation of the measures defined in Section 10 of the Anti-Corruption Program, JSC "NNEGC "Energoatom":

- ✓ has informed business partners about the principles and requirements in the field of preventing and combating corruption, provided for by the Anti-Corruption Program, and other policies developed for its implementation, including by posting the Anti-Corruption Program and other information on anti-corruption topics on the Company's official website;

- ✓ conduct an anti-corruption inspection of potential and existing business partners as a method of preventing corruption and reputational risks in due order;

- ✓ in 2024, the Anti-Corruption Commissioner and units (responsible persons) for the prevention and countering of corruption of the branches analyzed the bids under the established procedure, resulting in over 3900 conclusions;

- ✓ has approved standard forms of anti-corruption clauses to be included in agreements (contracts) entered into by the Company with business partners;

- ✓ during the reporting period the Anti-Corruption Commissioner and the units (responsible persons) for the prevention and countering of corruption of the branches reviewed over 8000 draft contracts (agreements) concluded by the Company for the presence and content of anti-corruption clauses and prevention of violations of anti-corruption legislation, considering the peculiarities of wartime; provided over 150 comments and suggestions to them.

## **REVIEWING REPORTS ON POSSIBLE VIOLATIONS OF ANTI-CORRUPTION LEGISLATION. WHISTLEBLOWER PROTECTION**

As part of the implementation of the measures set out in Sections 12 and 13 of the Anti-Corruption Program, JSC "NNEGC "Energoatom":

- ensured the functioning of internal communication channels for reporting possible facts of corruption or corruption-related offenses, other violations of the Law of Ukraine "On Prevention of Corruption" (hereinafter - reports);
- ensured compliance with the requirements of the Regulation on the implementing in JSC "NNEGC "Energoatom" mechanisms for encouraging whistleblowers and forming a culture of reporting possible facts of corruption or corruption-related offenses and other violations of the Law of Ukraine "On Prevention of Corruption";
- organized the provision of methodological assistance and consultations on reporting.

JSC "NNEGC "Energoatom" cooperates with persons who report in good faith possible facts of corruption or corruption-related offenses, and other violations of the Law of Ukraine "On Prevention of Corruption".

JSC "NNEGC "Energoatom" has established and operates the following internal communication channels for reporting:

- electronic communication channel: e-mail box "Trust Box";
- telephone communication channel: an anonymous hotline;
- verbal notification: informing the Anti-Corruption Commissioner in person.

In February 2024, JSC "NNEGC "Energoatom" joined the Unified Whistleblower Reporting Portal administered by the National Agency on Corruption Prevention.

Over 2024, 5 reports received through the Unified Whistleblower Reporting Portal were reviewed, including: 1 report was reviewed by the procedure established by the Law of Ukraine "On Prevention of Corruption" (during its preliminary review, the information was not confirmed), 3 reports were reviewed by the procedure established by the Law of Ukraine "On Citizens' Appeals", 1 report was sent to a specially authorized entity in the field of combating corruption without prior review.

In accordance with the provisions of the Anti-Corruption Program and internal company documents, the Anti-Corruption Commissioner ensured cooperation with whistleblowers and observance of the rights and guarantees of their protection provided by the Law of Ukraine "On Prevention of Corruption" in the reporting period.

## **PRIORITY MEASURES IN THE FIELD OF ANTI-CORRUPTION ACTIVITIES FOR 2025**

1. Arrangements for a regular evaluation of corruption risks in the activities of JSC "NNEGC "Energoatom" taking into account the recommendations provided by the NACP based on the results of a planned inspection of the organization of work on the prevention and detection of corruption in the Company's activities.

2. Organization of a discussion with the labor collective and submission to the Supervisory Board for approval of a draft of the new edition of the Company's Anti-corruption Program developed taking into account organizational changes related to the corporatization of SE "NAEK "Energoatom".

3. Introduction of amendments to the production documentation on corruption prevention as part of the scheduled review.

4. Intensification of the use of software products during awareness-building activities for JSC "NNEGC "Energoatom" employees on anti-corruption issues.