Appendix to the order

Rosatom Western Europe SARL

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**Anti-Bribery and Anti-Corruption Policy**

**Rosatom Western Europe SARL**

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Table of Contents

**Part 1: Anti-Bribery and Anti-Corruption Policy applicable in State Corporation Rosatom**

1. Purpose and Objectives of the Policy

2. Terms and Abbreviations

3. Basic principles of combating corruption, approaches to their implementation and the tools used

4. Combating Bribery and Corruption in the Company

 5. Functions of the Company employees and structural units in the field of combating Bribery and Corruption

6. Notification about suspected Bribery, Corrupt Practices or other violations of this Policy

7. Responsibility of the Company employees

**Part 2: Anti-Bribery and Anti-Corruption Policy** **of Rosatom Western Europe SARL**

1. Mapping of corruption risks which the Company or its employees may face

2. Development of various tools to combat bribery and corruption

**Part 1: Anti-Bribery and** **Anti-Corruption Policy applicable in State Corporation Rosatom**

The part below contains the provisions of the anti-corruption policy developed by the State Corporation.

**1. Purpose and Objectives of the Policy**

1.1. Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as the Policy) is an element of the general system of combating bribery and corrupt practices in foreign economic activities of Rosatom Western Europe SARL.

1.2. The Policy is an integral part of the administrative documentation of Rosatom Western Europe SARL and is binding on all its employees.

1.3. Rosatom Western Europe SARL will take all necessary steps to familiarize its business partners and contractors with the Policy.

1.4. The Policy is an open, public document. Rosatom Western Europe SARL provides access to the Policy to all employees and interested parties.

1.5. Administrative documents of Rosatom Western Europe SARL shall not contradict the provisions of the Policy and, if any contradictions are identified, such documents shall be harmonized with the Policy, unless the head of Rosatom Western Europe SARL adopts a resolution to eliminate contradictions by amending the Policy.

1.6. According to the established procedure, Rosatom Western Europe SARL issues a policy and other documents on combating Bribery and Corrupt Practices, that do not contradict this Policy.

**2. Terms and Abbreviations**

2.1. For the purposes of this Policy, the following terms and abbreviations shall be used:

|  |  |
| --- | --- |
| Abbreviation | Meaning |
| Bribery | An offer, promise or provision of Benefits by the employees of Rosatom Western Europe SARL or the Company's contractors acting on behalf and (or) in the interests of the Company (directly or through intermediaries) to any Recipient who influence the acquisition or retention of any Benefit for the Company, in full or in part: * with the intention that the Benefit will induce or serve as a reward for the Recipient's actions or omission, as a result of which the Company will acquire or retain any benefit for itself, or
* with the awareness of the fact that the Recipient's acceptance of Benefits may constitute improper behavior on the part of the Recipient.
 |
| Facilitation payment | Payments made for the purpose of expediting or simplifying usual government procedures, by a public official. |
| Benefit | Money, valuables, other property or services of a proprietary nature, other property rights. |
| Public Official | Any person holding a position or acting in the interests of a person holding a position in the legislative, executive and judicial authorities of the state or municipal level, including any person employed by or acting in the interests of a state/municipal body, state/municipal or stat-/municipality-owned enterprise, any federal or regional state/municipal body or institution, any political party, any candidate for political office or a relative of any such person, or a person associated with any such person.The term "Public Official" does not include employees of State Corporation Rosatom and organizations that are part of the management bodies of State Corporation Rosatom. |
| Business courtesies | Souvenirs and/or entertainment expenses defined in accordance with the Company's local regulation. |
| Initiator | The Company's employee initiating work under a specific contract/agreement, working with a specific contractor of the Company, carrying out the procurement in order to execute a contract/agreement with a contractor, or holding pre-contractual negotiations in order to execute a contract/agreement. |
| UIPS | Uniform Industry Procurement Standard (Procurement Standard) of the State Atomic Energy Corporation Rosatom. |
| Commercial bribery | Illegal receipt of Benefits by an employee of the Company performing managerial functions, as well as illegal use of property-related services or other property rights for committing actions (omission) in the interests of the giving individual or legal entity in connection with the official position held by this employee. |
| The Company | Rosatom Western Europe SARL |
| Conflict of Interests | A situation in which (direct or indirect) Personal Interest of the Company's employee affects or may affect proper performance of his/her official duties and in which a conflict arises or may arise between the Personal Interest of an employee of Rosatom Western Europe SARL and the interests of the Company that can entail damage to the Company. |
| Corruption practices | Commercial Bribery, Mediation in bribery, Conflict of Interest, Personal Interest. |
| CPC | Corporate plastic card |
| Personal Interest | A possibility for the Company employees to receive income in the form of money, valuables, other property or property-related services, other property rights for themselves or for third parties related to the performance of their official duties. Personal interest of an employee shall mean receipt of only such income that is not related to receipt of the regular remuneration by this employee or is not an incentive used paid in accordance with the Company's local regulations.  |
| Beneficiary | The person to whom the Benefit is offered, promised or provided. |
| Mediation in bribery | Direct transfer of a bribe on behalf of the bribe-giver or the bribe-taker or other assistance to the bribe-giver or the bribe-taker in reaching or executing an agreement between them on accepting and giving a bribe. |
| Legal management | The Company's subdivision hat performs advisory or legal assistance functions. |
| The Company's employee | All full-time employees of Rosatom Western Europe SARL, including managers. |
| ICA | Internal Control and Audit Service of the Company |
| System | A set of local regulations of the Company governing combating bribery and corruption practices.  |
| Influence peddling | The promise, offer or provision of an unlawful benefit to a person (directly or through third parties) so that he/she abuses his/her real or perceived influence in order to obtain a favorable decision from a governing or state body. In contrast to corruption, the person whose influence is required has the authority to perform or refrain from performing the required action. |
| Authorized employee | A person (employee or subdivision) responsible for prevention of corruption and other offenses, appointed in accordance with the Company's local regulation. |
| HR Division | HR Division: a structural unit of the Institution that performs the HR management functions. |
| Institution | Private Institution of Atomic Energy Power Corporation “Rusatom International Network” (Private Institution RAIN). |

**3. Basic principles of combating corruption, approaches to their implementation and the tools used**

3.1. This Policy is developed and implemented as one of the main elements of the Anti-Bribery and Anti-Corruption System in foreign economic activity in order to:

- Determine the basic principles, terms and conditions for combating Bribery and Corruption in the Company, as well as within the Company's business activities;

- Form the System taking into account international and Russian experience;

- Create an effective system for monitoring compliance by all the Company employees with the requirements of international law, the French legislation, the Company's local regulations in the field of combating Bribery and Corruption;

- Create conditions that prevent Bribery and Corruption;

- Form an atmosphere of zero tolerance to Bribery and Corruption in the Company.

3.2. The fundamental principles of the Company's operation are those referred to in Sub-clauses 3.2.1 - 3.2.10 hereof.

3.2.1. Integrity: the Company has been and will be committed to maintaining high standards of business ethics, honesty and openness in all its business operations.

3.2.2. Legality: the Company undertakes to comply with the laws of all countries of its operation, constantly adhering to high international ethical standards to ensure business transparency, intolerance to bribery and other corrupt practices on the part of its employees and managers. For these purposes, the Company implements the System, which is binding on all the Company employees.

3.2.3. Demonstration by all the Company employees of compliance with the rules and norms of ethical behavior, zero tolerance to Bribery and Corruption.

3.2.4. Acceptance by employees of the obligation to contact the Authorized Employee in accordance with this Policy in each case of detection of any signs of Corruption, Bribery or Facilitation Payment (at the same time, for the purposes of this Policy, it does not matter whether Bribery is practiced directly by an employee of the Company or the Company's contractor, or by any other person by prior agreement with an employee or contractor of the Company in the interests of the Company).

The subjects of Bribery are the Company employees, as well as business partners acting in the interests of the Company, such as agents or consultants.

The signs of Bribery include:

- Providing a Benefit for the Recipient to make a decision in favor of the Company;

- Making a Facilitation Payment;

- Violation of the provisions hereof when providing Business courtesies;

- Providing the Company's objects or property for free use, rendering property-related services free of charge;

- Conclusion of an agreement with a company owned by an employee or a person holding a senior position in the Company's contractor, or by members of their families;

3.2.5. The Company employees shall be guided by the definition of "Bribery" given herein, as well as by common sense and assess any transaction for the existence of the signs of Bribery and Corruption in accordance herewith. In case of any doubts about the correctness of their actions, the Company employees shall apply to the Authorized Employee for clarification in a particular situation.

3.2.6. The Company employees shall comply with the Company's local regulations, governing the Company's activities, referred to in Clause 4.4 hereof.

3.2.7. All the Company employees shall act and use the Company's resources only in its interests, clearly differentiate between the interests of the Company and their personal interests and shall avoid a possible Conflict of Interest.

3.2.8. The Company employees (personally or through intermediaries) shall not allow Bribery or Corruption or Mediation in bribery.

3.2.9. The Company employees shall comply with the legislation of France in the field of combating corruption, as well as with the provisions hereof.

3.2.10. If the Company employees detect any signs of Bribery (on the part of the Company employees or contractors), and/or if Facilitation Payments are registered and/or in case of manifestations of Corruption (on the part of the Company employees), they shall report them to the Authorized Employee in accordance herewith.

**4. Combating Bribery and Corruption in the Company**

4.1. Combating Bribery and Corruption in the Company is one of the key components of its normal operation. In this regard, the Company shall totally ban Corruption, Bribery and Facilitation Payments.

4.2. The ban on Bribery and Facilitation Payments shall apply to all the Company's business in all countries of its operation, except for the cases provided for by Clause 4.3. hereof.

4.3. If any actions containing signs of Bribery or Facilitation Payments are permitted under the applicable written law of the country in which it is planned to perform these actions, such actions may be carried out only by agreement with the Company manager.

It is prohibited to carry out actions (directly or through third parties) containing signs of Bribery, or to make Facilitation Payments (directly or through third parties) without obtaining the said approval of the Company manager.

4.4. The Company's activities exposed to Bribery, Corruption, as well as Facilitation Payments:

- Contractual activities;

- Procurement activities;

- Interaction with public authorities;

- Charitable activities;

- Business Courtesies.

4.4.1. When dealing with contractors and carrying out contractual activities, the Company employees shall act exclusively in the interests of the Company, shall prevent Bribery or Corruption, shall be guided by and strictly comply with the provisions of the Company's local regulations governing business processes: contractual activities, negotiation and signing of contractual documentation, work with contractors, and with other local regulations of the Company related to contractual activities.

[4.4.1.1](http://4.4.1.1). The Company employees, in particular, when interacting with contractors shall:

- Pay remuneration and reimburse the contractor for expenses under an agreement/contract (unless the agreement/contract with the contractor expressly provides otherwise);

- Document the relationship between the parties in the form of a written agreement.

[4.4.1.2](http://4.4.1.2). Prevention of Bribery or Corruption in the course of contractual activities involves identification by the Company employees of the signs of Bribery on the part of contractors, and identification of the signs of Corruption on the part of other Company employees engaged in contractual activities.

4.4.2. When preparing procurement documentation and carrying out procurement activities, the Company employees shall be guided by and comply with the UIPS requirements, the Company's local regulations governing the procedure for approval of procurements from a single supplier (counterparty, contractor) when placing orders, as well as the procedure for preparing and conducting open competitive procurement procedures, and shall refrain from any actions based on Personal Interest, which can affect the efficiency of procurement activities and proper performance by the Company employees of their duties.

[4.4.2.1](http://4.4.2.1). The Company employees who are members of the procurement commission shall be objective in making decisions, shall act exclusively in the interests of the Company, shall prevent Corruption and shall comply with requirements of the regulation on the Company's procurement commission.

4.4.3. When interacting with public authorities, the Company employees shall refrain from committing Bribery, as well as from making any Facilitation Payments.

4.4.4. The Company shall not provide financial or any other assistance to political parties (organisations), nor participate in the financing of election campaigns of candidates for elective office, as such assistance can be considered as an attempt to obtain an undue commercial advantage for the Company.

[4.4.4.1](http://4.4.4.1). The Company employees may exercise their personal rights to participate in political movements in accordance with French law, including making donations to political parties at their own discretion. However, in this case, the Company employees shall:

- Use only their own time and their own resources for these purposes;

- Exclude any possibility of misinterpretation by any persons of their views and actions as the official position of the Company, and not their personal ones;

- Ensure that such actions do not conflict with their functional duties in the Company.

[4.4.4.2](http://4.4.4.2). The Company's charitable activities shall be carried out exclusively on the basis of general industry limits for charitable activities approved by State Corporation Rosatom.

[4.4.4.3](http://4.4.4.3). Any Company's unscheduled activities of a charitable nature or charitable donations at the request of non-profit organizations shall be based exclusively on a resolution of the Company's governing body in accordance with the Company's local regulations.

4.4.5. The provision of Business Courtesies that do not violate the provisions hereof may contribute to positive business reputation and friendly working relations.

[4.4.5.1](http://4.4.5.1). The provision of Business Courtesies shall not violate the ethical principles of the Company's activities established by the Company's Code of Ethics and Business Conduct.

[4.4.5.2](http://4.4.5.2). The Business Courtesies shall be provided in strict accordance with the Company budget limits for the relevant types of expenses and shall be subject to control in accordance with the budget control procedures established in the Company.

[4.4.5.3](http://4.4.5.3). When providing Business Courtesies to the Company employees, it shall be prohibited to:

- Give cash or its equivalent (gift certificates, loans, shares or share options, etc.) regardless of value;

- Hold a hospitality event without the accompaniment and/or participation of the Company employees;

- Provide Business Courtesies to family members of an employee of a contractor, partner or other person, except for special events for which the business etiquette (custom) implies the participation of the spouse.

[4.4.5.4](http://4.4.5.4). The Company employees shall be prohibited from providing Business Courtesies, except for souvenirs, to Public Officials.

[4.4.5.5](http://4.4.5.5). The Company employees shall be prohibited from providing Business Courtesies to third parties on behalf of the actual or potential contractors or other business partners of the Company.

[4.4.5.6](http://4.4.5.6). The procedure for using CPCs, reporting on production costs using a CPC, the rights and responsibilities of CPC holders shall be determined in accordance with the rules of using CPCs in the Company.

[4.4.5.7](http://4.4.5.7). If necessary, the Company can arrange an entry visa, hotel reservations, transfers, purchase of air and railway tickets, medical insurance, etc. for its business partners on a reimbursable basis, i.e. with subsequent full reimbursement by the relevant business partners for the costs incurred by the Company.

The actions referred to in the previous paragraph shall be carried out by the Company only:

- in case of availability of a letter of guarantee from the Company's business partner with a positive resolution of the Company's Director;

- in the absence of overdue debts of the business partner to the Company.

Arrangement of entry visas, booking hotels, transfers, purchasing air and railway tickets, medical insurance, etc. for the Company's business partners free of charge (without subsequent full reimbursement of expenses incurred by the Company by respective business partners) shall be prohibited.

[4.4.5.8](http://4.4.5.8). Accounting for souvenirs and printed products provided by the Company, and entertainment expenses shall be carried out in accordance with the Company's local regulations.

**5. Functions of the Company employees and structural units in the field of combating Bribery and Corruption**

5.1. Company Manager:

5.1.1. Makes final decisions on all issues related to the operation of the System;

5.1.2. Demonstrates by personal example for the Company employees’ compliance with the rules and norms of ethical business conduct, zero tolerance to Bribery and Corruption;

5.1.3. Exercises control over the organization and implementation of the System as a whole;

5.1.4. Supervises the development and implementation of measures in the field of combating Bribery and Corruption in the Company.

5.2. The Company's Authorized Employee:

5.2.1. Is responsible for organizing combating Bribery and Corruption in the Company, and for the operation of the System;

5.2.2. Performs enhanced verification of business partners, contractors, intermediaries, agents of the Company for their reliability, business reputation, readiness to comply with the principles and standards of ethical business conduct adopted by the Company;

5.2.3. Together with the HR Division, participates in approval of candidates for Company vacant positions in order to improve the effectiveness of HR policy, and the formation of a responsible attitude among the Company employees to compliance with the established requirements in the field of combating Bribery and Corruption;

5.2.4. Checks the chain of owners and beneficiaries (including the ultimate owners and beneficiaries) of the Company's counterparties in order to avoid a Conflict of Interest, implements other measures aimed at identifying and eliminating the causes and conditions that contribute to a Conflict of Interest;

5.2.5. Develops and implements measures to protect the interests of the Company from illegal actions of legal entities and individuals, which cause actual material or reputational damage to the Company, destabilize the operation and development of the Company in accordance with its statutory objectives;

5.2.6. Checks incoming information on detected signs of Bribery, Corruption, fraud, misappropriation, embezzlement, or abuse of authority by the Company employees, theft of property and other illegal actions. Reports the results of the inspection to the President of the Institution;

5.2.7. Performs anti-corruption expertise of drafts of the Company's local regulations, and agreements/contracts executed by the Company;

5.2.8. Conducts annual assessment of corruption risks in the Company based on the risk classifier, assesses the risks of Bribery by the Company employees, contractors and partners within the framework of the Company's business activities. Based on the results of the annual assessment of corruption and bribery exposure of the Company, has the right to put forward proposals to improve the System;

5.2.9. Carries out permanent monitoring and control of compliance by all the Company employees with the requirements of the Company's local regulations, including this Policy, in order to prevent Bribery and Corruption;

5.2.10. Participates in the investigation of the causes of non-compliance with the requirements of local regulations in the field of combating Bribery and Corruption in effect in the Company within his/her competence;

5.2.11. Collects, accumulates, summarizes and distributes best Anti-Bribery and Anti-Corruption practices, forms a base of practical experience of the System operation within the Company, submits proposals to the President of the Institution to improve the System;

5.2.12. Together with the HR Division and with the necessary assistance from the Legal Department (within its competence), organizes training of the Company employees on combating Bribery and Corruption, and the practical application of the requirements of local regulations in the field of combating Bribery and Corruption;

5.2.13. In cooperation with the structural business units of the Company, informs authorized representatives of business partners, contractors, intermediaries and other persons about and familiarizes them with the principles and standards of doing business adopted by the Company;

5.2.14. Initiates and develops draft local regulations and proposals and recommendations for the management of the Institution to improve the System, with the necessary assistance from the Legal Department (within its competence);

5.2.15. Interacts with organizations and unitary enterprises subordinate to State Corporation Rosatom, with contractors and law enforcement agencies of the Russian Federation and foreign countries on the issues of combating Bribery and Corruption;

5.2.16. Provides information support to the management of the Institution on the issues of combating Bribery and Corruption related to ensuring economic security;

5.2.17. Ensures unhindered performance by the Company employees of the obligation to inform the Authorized Employee or law enforcement agencies about all cases of Bribery and Corruption by the Company employees or the cases of contacting the Company employees in order to induce them to commit Bribery or Corruption;

5.2.18. Ensures the confidentiality of the personal data of the Company employees or other interested persons who have reported signs of Bribery or other Corruption, or other clearly illegal actions, as well as the confidentiality of the very fact of the report.

5.3. Internal Control and Audit Department of the Institution:

5.3.1. Plans, organizes and verifies certain issues of financial and economic activity of the Company's structural business units;

5.3.2. Checks compliance with the requirements of external and internal regulations, as well as the requirements of regulatory authorities;

5.3.3. Performs a random check of procurement procedures for their compliance with the UIPS and other acts of State Corporation Rosatom issued pursuant to the UIPS.

5.4. HR Division

5.4.1. At the time of admission to the Company (prior to the issuance of the employment order), familiarizes candidates with this Policy and the Company's local regulations governing the work with contractors, as well as other mandatory local regulations of the Company;

5.4.2. Together with the Authorized Employee, organizes training of the Company employees on combating Bribery and Corruption.

5.4.3. Together with the Authorized Employee, participates in the approval of candidates for Company vacant positions in order to improve the personnel policy and the formation of a responsible attitude among the Company employees to compliance with the established requirements in the field of combating Bribery and Corruption.

**6. Reporting suspected Bribery, Corruption or other violations of this Policy**

6.1. Information on signs of Bribery, Corruption or other violations hereof shall be provided by the Company employee or by any interested person to the Authorized Employee in the form of information related to the alleged violation or illegal actions both of the Company employees and the Company's contractors, partners, consultants of other persons.

6.2. Reporting suspected Bribery, Corruption, or other violations hereof may include:

* Non-compliance by the Company employees with the local regulations of State Corporation Rosatom and the Company governing the activities of the Company referred to in Clause 4.4 hereof;
* Actual Conflicts of Interest or their signs;
* Improper actions of the Company's business partners and contractors;
* Violations of ethical business conduct, violations of the Company's Code of Ethics and Business Conduct;
* Acts and omissions of the Company employees, which can cause damage to the Company's business reputation;
* Intentional errors, misstatements or material omissions of information for the purposes of accounting and tax accounting and reporting, internal control and audit, submission of information to public authorities or document falsifications;
* Intentional (deliberate) concealment of information about the commission by a Company employee of unlawful actions.

6.3. If a Company employee detects any signs of illegal activity on the part of other employees of the Company or identifies any committed acts of illegal activity, (s)he is obliged to report such circumstances to the Authorized Employee.

6.4. The Company employees shall immediately inform the Authorized Employee of suspected Bribery, Corruption or other violations hereof.

6.5. Reports of suspected Bribery, Corruption, or other violations hereof shall be true, free from false motivation, malicious intent or personal advantage.

6.6. Upon receipt of information on suspected Bribery, Corruption or other violations hereof, the Authorized Employee shall take all necessary measures to ensure confidentiality in relation to the Company reporting employee.

6.7. In order to conduct a comprehensive investigation, clarify all the circumstances that have caused suspicions of Bribery, Corruption or other violations hereof, no anonymous reports shall be allowed.

6.8. Upon receipt of information about suspected Bribery, Corruption or other violations hereof, the Authorized Employee shall conduct an official investigation in respect of received information in accordance with the procedure established by the Company's local regulation governing the internal investigation procedure in the Company.

6.9. If an employee is found to have knowingly submitted false information about suspected Bribery, Corruption or other violations hereof, such employee shall be subject to disciplinary measures.

**7. Responsibility of the Company employees**

7.1. Each employee of the Company shall be personally responsible for compliance with this Policy.

7.2. Employees who have violated the requirements hereof may be subject to disciplinary measures up to dismissal in accordance with the labor legislation of France, and may also be subject to administrative or criminal liability under the law of France.

**Part 2: Anti-Bribery and Anti-Corruption Policy of Rosatom Western Europe SARL**

Head of Rosatom Western Europe SARL emphasizes that the decisions made within State Corporation Rosatom are applied to and implemented in the Company's local Policy.

Thus, in addition to the Anti-Bribery and Anti-Corruption Policy implemented by the State Corporation in Russia, Rosatom Western Europe SARL has adopted and implemented the Policy set out below, which meets the legal traditions of France and is based on the law called Sapin II (Law
No. 2016-1691 dated December 9, 2016. "On Transparency, Anti-Corruption and Modernization of the Economy").

Head of Rosatom Western Europe SARL is responsible for updating and monitoring the implementation of this Policy in France and is responsible for ethics and compliance (or is appointed as the Authorized Employee).

This Policy is aimed at eliminating the risks of corruption, influence peddling and conflicts of interest in accordance with the norms of the French law.

**1. Mapping of corruption risks which the Company or its employees may face**

It appears that these kinds of risks may fall under the category of threats of both passive and active corruption.

Since these risks occur at specific identified levels of legal relations, in particular, during procurement and tenders, Rosatom Western Europe SARL has developed the following rules for each situation involving a risk.

**1.1 When entering into a business relationship:**

When an employee of the Company enters into a business relationship with a new or potential partner in order to establish a contractual relationship, there is a risk that the partner may offer or request procedures or benefits in violation of normal practice or regulatory norms which may constitute offenses in the form of bribery, corruption or influence peddling. Such a new partner can act as a supplier of goods, a customer, a service provider, a subcontractor, an intermediary, etc.

The risk also exists in relationships with former partners with whom business relations have ceased for some time or for several years.

Such risks include:

 - Non-compliance with the procurement rules: e.g., procurement shall be the subject of a tender, but the partner offers to conduct several separate procurements in order to reduce the cost to a level that makes the tender procedure unnecessary;

 - An offer which includes the partial return of value, which is not justified in terms of quantity, etc.

Under no circumstances shall an employee violate applicable legal norms or procedures. In case of any doubts, the employee shall contact his/her direct supervisor or a lawyer, or an expert on compliance in the required industry.

**1.2 In the course of business relations:**

The business relations are also exposed to corruption.

Two types of situations seem to be particularly susceptible to an increased risk of corruption: business gifts and invitations from partners (**1.2.1**); situations involving a conflict of interest (**1.2.2**). Other situations may also become a source of risks (**1.2.3**).

**1.2.1 Business gifts and invitations from partners**

Taking into account that the gifts and invitations received and presented may be part of everyday business, being a sign of politeness or custom, they nevertheless shall not imply any response action and shall not influence the decisions of the Company employees.

In this regard, gifts and invitations shall remain part of professional etiquette, shall be within reasonable limits in terms of cost and frequency, shall follow a transparent acceptance procedure and, if possible, shall be distributed within the team.

Special attention shall be paid to gifts and invitations addressed to the Company decision-maker.

Rosatom Western Europe SARL allows its employees, under certain conditions, to receive certain gifts which value does not exceed the established amount and is subject to obtaining a permit.

Thus, an employee may accept or present gifts worth less than one hundred (100) Euro without requesting official permission and without declaring them to the Company.

A gift worth more than one hundred (100) Euro and less than two hundred (200) Euro shall be reported to the Company and a permission for its acceptance shall be received from the Company.

At the same time, it is prohibited to accept or offer any gifts worth more than 200 Euro.

**1.2.2 Conflicts of interest**

A conflict of interest is a situation in which an employee has personal, financial or family interests that may affect his/her decisions during the performance of his/her official duties in the Company.

Example: a family member of the Company's employee works for a supplier to be interacted with in fulfilling his/her official duties in the Company.

An employee shall notify his/her line manager or a lawyer or an ethics or compliance specialist of any risk concerning him/her. An employee shall also report all cases of attempted bribery, inappropriate behavior and in general any form of pressure exerted on him/her.

In the event of a conflict of interest (e.g., if an employee's spouse works for the Company's supplier; an employee holding a managerial position wants to offer a position to his/her family member or friend; an employee makes financial investments in a company which Rosatom Western Europe SARL maintains business relations with), an employee shall refrain from making a decision and report the conflict situation to his/her line manager so that the relevant assignment is delegated to another employee.

**1.2.3 Other situations that may be a risk source**

**1.2.3.1 Patronage**

Patronage is financial or material support provided in the absence of any direct response actions from the beneficiary in favor of a work or a person for the purpose of carrying out activities of public interest.

As part of the patronage activities, the Company employees shall behave in accordance with the provisions of the Company's Code of Ethics and Business Conduct.

**1.2.3.2 Sponsorship**

Sponsorship is financial or material support provided in the interests of a certain event, person, product, etc. in order to obtain direct benefits (e.g., advertising).

As part of the sponsorship activities, the Company employees shall behave in accordance with the provisions of the Company's Code of Ethics and Business Conduct.

**1.2.3.4 Facilitation payment**

Facilitation Payment means direct or indirect payment of illegal remuneration to a public official for the performance of administrative formalities, which shall be performed legally in the usual way.

Despite the fact that such payments exist in a number of countries, this practice is strictly prohibited in Rosatom Western Europe SARL.

Under no circumstances shall an employee of the Company agree to go beyond the procedures established by applicable regulations.

Examples of actions that go beyond the established limits: a public official asks for an unreasonable fee for issuing a business visa; a public official asks for money to accelerate customs clearance of property.

**1.2.3.5 Lobbying**

Lobbying is an action by which representatives or stakeholders influence the decision-making of government officials.

Within the framework of lobbying activities, the Company's employees shall behave in strict accordance with the provisions of this Policy, excluding the possibility of any corrupt actions or influence peddling.

Any employee of Rosatom Western Europe SARL who has regular direct or indirect personal contacts with government decision-makers shall inform his/her line manager about such contacts.

**2. Development of various tools to combat bribery and corruption**

Rosatom Western Europe SARL has developed an ethical code that establishes the rules in effect in the Company in order to mitigate the corruption risks.

Rosatom Western Europe SARL has also introduced an awareness and training procedure for employees exposed to bribery and corruption, as well as an internal reporting system that allows anyone being personally aware of facts that contradict the Company's anti-corruption policy, and of other offenses, to report these facts.

Rosatom Western Europe SARL has appointed its head responsible for ethics and compliance in France. It also provided a special phone number (+7 800 100-0707), an e-mail address (0707@rosatom.ru) and a web page (https://rosatom.ru/en/about-us/anti-corruption-policy/) intended for reporting the offenses.

Rosatom Western Europe SARL has created a multi-level control system: collecting information and verifying the status of its contractors (within the limits necessary to combat corruption and in accordance with the General Data Protection Regulation (GDPR)), accounting control of financial flows, disciplinary control.

The Company familiarizes its contractors with its Anti-Bribery and Anti-Corruption Policy and asks business partners to commit to disseminate and apply its internal Policy when conducting external activities.