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| Regional centre of the State Corporation Rosatom |
| **Rosatom Western Europe SARL** |
| Local regulatory act |

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| CODE  of Ethics and Professional Conduct of the Employees of Rosatom Western Europe | | |
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# 1. Introduction

1.1. The Code of Ethics and Professional Conduct of the Employees of Rosatom Western Europe SARL (hereinafter referred to as “the Code”) is the document that translates values of the regional center Rosatom Western Europe SARL (hereinafter referred to as “the RC”), identifies ethical principles and rules of conduct based thereof, including standards established in the applicable local regulatory acts of the RC. The Code is not an exhaustive body of rules.

1.2. The Code is called to facilitate:

prevention of risks of breaches of the law and ethical principles of conduct adopted in the RC;

strengthening of the business reputation of the RC;

introduction of the RC values in the sector.

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

Federal Law No. 317-FZ of 01.12.2007 “On the State Atomic Energy Corporation ‘Rosatom’”,

Federal Law No. 273-FZ of 25.12.2008 “On Countering Corruption”,

General Principles of Professional Conduct of Civil Servants, as approved by Decree of the President of Russian Federation No. 885 of 12.08.2002,

Methodological Recommendations for Development and Adoption of Corruption Prevention and Countering Measures (Ministry of Labor of Russia, 08.11.2013),

IAEA Recommendations “Handbooks of Nuclear Law”, 2006, 2010, IAEA Safety Guide No. GS-G-3.5, 2014;

Unified Sectoral Anti-Corruption Policy of the State Atomic Energy Corporation “Rosatom” and its Organizations, as approved by ROSATOM’s order No. 1/364-P of 14.04.2015;

Law of France 2016-1691 of 9th December 2016 Regarding Transparency, the Fight Against Corruption, and Modernization of Economic (Law of Sapin II)

Basic anti-corruption concepts, Council of Europe, training manual.

# 2. Basic Terms and Abbreviations

For the purposes of this Code the following terms and abbreviations are used:

**Anti-corruption Policy**is a local regulatory document of the RC, which main purpose is to define principles of combating corruption.

**Confidentiality of information** is the requirement for a person received specific information not to transmit such information to third persons without consent of its holder.

**Conflict of interests**is the situation where vested interest (direct or indirect) of the RC employee, who holds the position, which assumes the responsibility of taking measures to prevent or settle the conflict of interests, affects or can affect the proper, objective and impartial execution by him/her the duty of office (exercise of powers).

**Corporation**is the State Atomic Energy Corporation “Rosatom”.

**KPI** is the key performance indicator.

**Vested interest**, in the context of the term “vested interest”, is understood as a possibility of receiving incomes as money, other property, including property rights, monetized services, results of executed works or any other benefits (advantages) by an RC employee or its organizations, who holds the position, which assumes the responsibility of taking measures to prevent or settle the conflict of interests, and (or) persons being his/her close relatives or connections by marriage (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and children’s spouses), citizens or organizations, with which the said employee, and (or) persons being his/her close relatives or connections by marriage, is bound by property, corporate or other close relations.

**RC** is the regional center Rosatom Western Europe SARL.

**Rotation** is constant or temporal change of the employee’s labor function upon continuation of employment with the same employer as well as transient of the employer for employment with a different employer. Performed as temporal transition in the form of assignment.

**Mass media** are the mass media agencies and corporations.

**Council on ethics** is the continuously acting structure of the Institution, which main purpose of activities is the assessment of the actions of RC employees for compliance with the provisions of this Code of ethics.

**Institution** is the Private Institution of Ensuring Development of International Regional Network of Atomic Energy Industrial Complex “Rusatom – International Network”.

**Ethics** is the system of moral principles, norms and values that determine the behavior of a human being and allow giving positive or negative assessment of his/her actions, ideas and attitudes.

**Ethical assessment** is the interpretation of actions/withstanding from actions of the RC employees from the point of view of compliance of their behavior to the norms and rules stipulated by this Code of ethics.

**Ethical principles** are the principles and norms of business ethics and rules of business attitude and behavior stipulated by this Code of ethics.

# 3. Values of the RC

## The following values are adopted in the RC:

**One step ahead**

We strive to be the leader in the global market. We are always one step ahead in technology, knowledge and the professional strength of our employees. We foresee what will be tomorrow and are ready to be it today. We continuously advance and learn. Every day we try to work better than yesterday.

**Responsibility for the Result**

Each of us bears personal responsibility for his/her work result to the State, Sector, colleagues and customers. In our work, we set for ourselves the most stringent requirements. It is not the spent effort that is evaluated, but the achieved results. The successful results are the basis for our new achievements.

**Efficiency**

We always find the best solutions to problems. We are efficient in all we do; when achieving the set targets, we make efficient use of the company’s resources and are continuously improving our working processes. There are no obstacles that can hinder our finding out the most efficient solutions.

**One Team**

We all are ROSATOM. We have common goals. Working in a team of like-minded fellows allows for unique results. Together we are stronger and can achieve most ambitious goals. The successes of our employees are the successes of the team.

**Respect**

We always treat our customers, partners and suppliers with respect. We always attentively listen to and hear each other, regardless of positions and places of work. We respect the history and traditions of the nuclear industry. The achievements of the past inspire us for new victories.

**Safety**

Safety is the highest priority. In our work, we ensure absolute safety of people and the environment first. There are no minutiae in safety; we know safety rules and follow them, while putting a stop to violations.

Provided unavailability of the corresponding norms set by local corporate acts of the RC the decisions are to be made on the basis of the values of the RC.

# 4. Ethical Principles of Conduct of the RC Employees

## 4.1. Common Ethical Principles of Conduct of the RC Employees:

compliance with the law of France, the UE and other countries where the RC operates;

intolerance to violations of labor protection and safety requirements in the use of atomic energy;

inadmissibility of any forms of coercion and harassment;

zero tolerance to corruption;

inadmissibility of favoritism and discrimination associated with race, skin color, nationality, ethnic affiliation, gender, age, confession and religion conviction, property, social, official, marital status, political convictions, adherence to non-governmental associations, human physical capacities, and other similar characteristics;

inadmissibility of humiliation of honor and dignity of other people;

inadmissibility of circulation of knowingly false information, which tarnish the honor and dignity of employees and partners, and undermine their reputation.

**4.2. Relations with the State**

The employees of the RC:

- are aware of their special responsibility arising from the participation of the Russian Federation in management of the Corporation and strive to be a pattern to follow in execution of their powers serving the interests of the State;

- in his/her activities are guided by generally recognized principles and norm of the international law and legislation of France and EU;

- build up sustainable and constructive relationships with the State powers and local authorities being guided by the principles of responsibility, good faith and independence;

- do not use their official and occupational status to impact activities of the State bodies, organizations, officials, civil servants and citizens in settling personal matters;

- demonstrate civility and solicitude in treating citizens and officials;

- and refrain from public utterance, judgments and assessments on behalf of the RC as regards activities of the State body or local authority, its head, if it is beyond job duties of the employees.  **4.3.  Relations with Organizations’ Founders (Partners) and Investors**

The RC takes care of enhancement of investment attractiveness and strengthening business reputation in the eyes of investors. Transparency and openness are the foundation for trust in the RC.

The RC respects rights of all organizations’ founders (partners) and investors and guarantee them that their rights, as established by the law of the Russian Federation and local regulatory acts of the RC, will be observed.

**Employees of the RC**,

timely and in full, provide the parties concerned with the material information about the RC’ activities through public disclosure in accordance with the established procedure, except for the restricted access information and data, which constitute the State secret.

**4.4. Relations with Employees**

Professionalism and involvement of the personnel are a valuable resource of the RC. The RC facilitate enhancement of prestige of work in the nuclear sector and ensure that the employees have safe labor conditions. The Director of the RC strives to create an atmosphere, which facilitate unveiling the employees’ potential, in the team.

The RC recognizes labor rights an integral part of human rights, observes the principles of social partnership, terms and conditions of the existing Industrial Agreements on Atomic Energy, Industry and Science, Collective Employment Agreement, and supports nuclear industry veterans as per the provision of social policy of the RC.

**To develop the career, the RC employees have to:**

follow the corporate values;

fulfill individual KPI 100% and higher;

be ready to rotation both inside the RC or between its organizations, to additional load and work in conditions of changes; and

be ready to move to other regions.

**4.5. Relations with Society and Non-governmental Organizations**

The RC activities affect residents of their host regions. The RC is guided by the principle of social responsibility in making decisions dealing with interests of the local population.

**Employees of the RC:**

show tolerance and respect for traditions of the peoples in host regions of the RC, take account of cultural and other features of different ethnic, social groups and confessions, facilitate inter-national and inter-confessional consent;

observe neutrality that excludes a possibility of influence of political parties and other non-governmental associations’ decisions on their official activities;

exclude any actions capable to raise doubts in objective performance by the RC employees of the job duties and do not allow conflict situations that might damage their reputation or the RC reputation;

do not favor any professional and social groups and organizations, retain independence from influence of individuals, professional or social groups and organizations;

contribute to development of regions through participation in solving current objectives and implementation of development projects of the host regions of the RC.

**4.6. Relations with Contractors and Business Partners**

The RC build up interaction with contractors and business partners on an open and mutually beneficial basis while fulfilling undertaken commitments in the full scope. At the same time, the RC sets forth strict requirements to quality of provided goods and services, to reliability of contractors and business partners, to observance by them of the business community rules, including anti-corruption rules.

**Employees of the RC:**

take account of contractor and business partner attitudes to ethical principles of conduct of the RC employees; and

thoroughly consider and timely respond to claims, applications and proposals incoming the RC regarding the issues of relationships with counteragents and business partners.

**4.7. Relations with Mass Media**

The RC continuously interacts with mass media and builds it up on the principles of openness and transparency. The RC carries out relations with mass media through structural divisions and (or) employees having the corresponding authorities. Only authorized officials of the RC can appear before mass media as well as at events with mass media participation.

**Employees of the RC observe the following rules in relations with mass media:**

avoid any statements and utterance uncoordinated with the Head of the RC which may perceived as an official position of the RC;

refrain from passing to mass media information and documents about the RC activities which has not been agreed upon with the authorized structural division of the RC;

in the event of speaking as a RC employee at a public assembly with participation of mass media, get this speech agreed with the Director of the RC;

without comments and distortions send appeals (information) from mass media representatives to structural divisions and (or) employees of the Institution having authorities to interact with mass media; and

in preparing public presentations aimed at the outside audience, use local regulatory acts of the Corporation on creation and drawing of presentations.

# 5.  Rules of Conduct of the RC Employees

**5.1. Corruption Control**

Corruption control in the RC is carried out in accordance with the Anti-Corruption Policy.

In the RC the atmosphere of zero tolerance to corruption conduct has been created and maintained. Any corruption-related breaches of law stand condemned since they jeopardize the fundamentals of safety and efficiency.

**The Director of the RC** is the guarantor that the anti-corruption rules and procedures are fulfilled; he or she demonstrates the personal example of observance of the anti-corruption rules of conduct and bear personal responsibility for non-observance of principles of the Anti-Corruption Policy in the RC.

**Employees of the RC:**

refrain from corruption and other breaches of law in the interests or on behalf of the RC; and

strive to avoid the conduct, which may be interpreted by others as readiness to commit or participate in commitment of a corruption-related crime in the interest or on behalf of the RC.

**5.2. Security of Recourses and Property**

Delicate handling of property, its use only for the intended purpose, and economical spending of resources are an important condition of efficiency and stability of the RC activities.

**Employees of the RC:**

in planning and use of resources, choose the option, where it is possible to minimize expenses if this does not affect safety, quality and terms; and

use resources and property of the RC (including tools and equipment, vehicles and different means of communication) for execution of their employment duties only.

**5.3. Information Security**

A breach of confidentiality of information or a procedure of handling the documents, which contain such information, can impair the RC. The RC introduces constraints on handling confidential information as per the law. These constraints help maintain a reasonable balance between openness and observance of the business and economic interests of the RC.

**Employees of the RC:**

observe provisions of the documents, which regulate the handling procedure of confidential information and personal data of employees; and

hand over confidential information to third persons in accordance with the law and local regulatory acts of the RC published in furtherance of the law.

**5.4. Conflict of Interests**

**Employees of the RC:**

avoid situations, which lead to conflicts of interests or have signs thereof; and

take statutory required measures to prevent a conflict of interest and to settle arising conflicts of interests.

**5.5. Receiving and Giving Gifts, Exercise of Hospitality**

Receiving and giving gifts, exercise of hospitality are the sign of politeness and respect, they facilitate building up business relations provided they are of symbolic nature, not called to influence decision-making, and do not give rise to tracing such influence.

**Employees of the RC:**

are guided by special requirements for receipt of, giving gift and showing hospitality in accordance with the law and local regulatory acts of the RC published in its furtherance.

**5.6. Employment of RC Employees’ Relatives**

The RC welcomes the wish of relatives of an RC employee to work in the Sector. With this, all candidates participate in competitions for filling vacant positions on the same basis as everyone else and do not have an advantage or special rights upon entry into employment.

**Employees of the RC:**

do not affect decisions on promotion of their relatives who work in the RC; and

do not use their links to relatives to influence decision-making in fulfilling their official duties.

**5.7. Labor Protection, Environmental Protection, Nuclear, Radiation and Industrial Safety**

Protection and safety of environment are the priority environmental objectives of the RC.

The RC performs reliable environmental policy, which is based on the principles of reasonable nature exploration, preservation of the environment in the regions of industrial activities, enhancement of the radiation monitoring systems;

The RC ensures safe labor conditions for its employees. All injures, incidents and events without any exception as well as its precoursers are the subject for investigations. The investigations shall result in making decisions excluding a repetition of such events.

Violation of requirements of labor protection, environmental protection, nuclear, radiation and industrial safety entails applying to employees the penalties as per norms of the law of France and host countries of the RC.

**Employees of the RC:**

given the responsibility towards future generations, find the balance between economic initiatives and essential environmental issues;

in addition to the mandatory preventive actions excluding the risks for the general public and environment work on minimization of negative influence caused to the environment by application of their own engineering achievements and world best practices in this area;

are aware and observe requirements of the law of France, the EU, local regulatory acts of the RC in the field of labor protection;

immediately stop any work if it can lead dangerous consequences for their own lives or safety of others;

start (allow other employees) working only if there are qualifications corresponding to this work, appropriate training and absence of medial contra-indications;

use personal protection equipment when such equipment is necessary for fulfillment of production objectives;

provide information, render other assistance in investigation into occupational injuries and prerequisites thereof;

refrain from being at the working place under the influence of alcohol, drugs or other matter, bringing, storage or distribution of drugs and other substances, which circulation is prohibited by law, in any rooms of the RC;

refrain from smoking on the premises or in facilities of the RC, except for specially designated places;

immediately inform the authorized structural division or official of the RC on potential and occurring violations of labor protection, environmental protection; and

have the right of protection of confidentiality of information about the fact and content of such appeals;

involve non-governmental environmental organizations to participation is discussions of the planned activities in the area of use of atomic energy with respect to the issues of environment protection and ensuring environmental safety;

promote development of environmental culture, environmental education, training and bring-up of the RC employees and general public in the regions hosting nuclear facilities.

**5.8. Conflicts in the RC**

The RC carries out necessary actions to reduce risks of conflicts and disputes between employees of the RC.

The RC recognizes the importance of pre-trial settlement of internal conflicts and strives to settle all disputes through negotiations with employees.

**Employees of the RC:**

when prerequisites of a conflict arise or appear, in the framework of the RC, turn to an immediate supervisor or to the Human Resource Department of the Institution.

**5.9. Corporate Identity**

Each employee shall facilitate building up the corporate identity of the RC. An appearance and conduct of an employee influence on how external audience perceive nuclear sector.

**Employees of the RC:**

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

when representing interests of the RC, avoid conduct and utterance damaging identity of the RC; and

selecting clothes for work, are guided by generally accepted dress code rules based on the principles of modesty, accuracy and cleanness.

**6. Application of the Code**

This Code covers all spheres of activity of the RC. All internal regulatory documents are produced taking into account the Code provisions.

The responsible person for updating of this Code of ethics and surveillance over compliance with its provisions is the Director of the RC. All amendments are to be introduced in accordance with the procedure established in the RC.

Observance of the Code’s provisions does not replace the necessity of observing requirements of law of France and other countries where the RC operates. Should any contradictions arise between the provisions of the Code and requirements of the law, it is necessary to be guided by requirements of the law.

Most important tool of enforcement of observance of the Code provisions is the employee’s inherent self-assessment and his/her moral appraisal by superiors and colleagues.

When formulating appeals regarding violations of the Code provisions, the employees should follow the following procedure:

to indicate the violator that it is impermissible to violate the Code procedures and to require stop these actions;

in case there is no a positive result, to notify the immediate superior on the violation; and

if the immediate superior is involved in the violation or does not take measures to stop the violation, to seek advice from the Council of ethics.

The activities of the Ethics Council are regulated by the Regulation approved by order of the President of the Institution.

In the RC, pursuit or punishment of employees for appeals related to potential and occurring violations of this Code by other employees is prohibited.

Incompliance with the provisions of this Code for the RC employees might lead to disciplinary and other types of disciplinary liability in the cases of violations of the local regulatory acts adopted in pursuit of this Code.

An employee might address any issues associated with application of this Code to the Human Resource Department of the Institution.