APPROVED

by the Decision of the Supervisory Board of

JSC NNEGC Energoatom, dated 11.07.2025, Minutes of Meeting No. 10

**POLICY**

**of corporate social responsibility and sustainable development**

 **of the Joint Stock Company "National Nuclear Energy Generating Company "Energoatom"**

1. GENERAL PROVISIONS
	1. This Policy of Corporate Social Responsibility and Sustainable Development of the Joint Stock Company "National Nuclear Energy Generating Company "Energoatom" (hereinafter referred to as the Policy) has been developed for the first time in accordance with the existing Policy Statements.
	2. The purpose of this Policy is to define the key principles and approaches of the Joint Stock Company National Nuclear Energy Generating Company (hereinafter referred to as NNEGC Energoatom, the Company) to corporate social responsibility in order to achieve the Company's strategic goals and sustainable development goals. This Policy ensures that the Company operates ethically and takes into account the social, economic and environmental impact of its activities.
	3. This Policy defines the priority areas of corporate social responsibility for achieving sustainable development goals.
	4. This Policy has been developed taking into account the recommendations of:

17 UN Sustainable Development Goals by 2030, which were approved at the UN Sustainable Development Summit in 2015

10 principles of the UN Global Compact;

National Standard ISO 26000: 2019 (ISO 26000:2010, IDT) "Guidance on Social Responsibility";

Sustainability Reporting Guidelines (GRI);

European Green Deal;

OECD's Responsible Business Initiative.

* 1. All employees of the Company shall be familiarized with this Policy.

**1.6** In this Policy, the following terms are used in the following meanings:

**Corporate Social Responsibility (CSR)** is the responsibility of a company for the impact of its decisions and activities on society and environment through transparent and ethical behavior that promotes sustainable development, including the health and well-being of society; takes into account the expectations of stakeholders; complies with applicable laws and international standards of behavior; is integrated into the company's activities and practiced in its relations with others.

**Sustainable development** is the development of society that meets the needs of the present generations and does not jeopardize the ability of future generations to meet their own needs.

**Stakeholders** - a person or group of persons that have interests in any decisions or activities of the company.

**Stakeholder engagement** means actions taken to create an opportunity for dialogue between the company and one or more stakeholders in order to form an information basis for decision-making.

**Sustainable Development Goals** - key areas of development of countries that were adopted for the period from 2015 to 2030 at the UN Summit on Sustainable Development and include 17 Sustainable Development Goals and 169 related targets aimed at achieving sustainable development in three dimensions: economic, social and environmental, as well as strengthening peace and ensuring human rights.

The **UN Global Compact** is a code of conduct developed by the United Nations, consisting of ten principles in the areas of human rights, employment, environment and anti-corruption.

**DSTU ISO 26000:2019 (ISO 26000:2010, IDT**) is the national standard "Guidance on social responsibility", adopted by the method of translation, identical to ISO 26000:2010 "Guidance on social responsibility", a guide to the principles underlying social responsibility, recognition of social responsibility and stakeholder engagement, key topics and issues related to social responsibility, and ways to integrate socially responsible behavior into the organization.

**The Global Reporting Initiative** (GRI) is a voluntary international network based on cooperation between companies, employers' organizations, investors, auditors, public organizations and other stakeholders, which aims to ensure that companies use non-financial reporting based on the triple criterion: economic, environmental and social performances.

**Transparency** is the openness and availability of information on decisions and activities that affect society, economy and environment, as well as the willingness to share information about them in a clear, accurate, timely, honest and complete manner.

**Accountability** is the state of responsibility for decisions and activities to the company's bodies, state supervisory (control) authorities and stakeholders.

**Working conditions** - a set of factors of the production environment and labor process that affect the health and performance of an employee.

**Occupational health and safety** is a system of legal, socio-economic, organizational, technical, sanitary and hygienic, and medical and preventive measures and arrangements aimed at preserving human health and performance in the work process.

**Human rights** - a set of civil, political, economic, environmental, social and cultural rights that are inalienable and universal for all people in all countries of the world, including the right to life and liberty, equality before the law and freedom of expression, the right to work, food, the highest attainable standard of health, education and social protection.

**Mobbing (harassment**) means systematic (repeated) long-term intentional actions or omissions of the employer, individual employees or a group of employees of the labor collective aimed at humiliating the honor and dignity of the employee, their business reputation, including with the aim of acquiring, changing or terminating their labor rights and obligations, manifested in the form of psychological and/or economic pressure, including through the use of electronic communications, creating a tense, hostile, offensive atmosphere towards an employee, including one that makes them underestimate their professional suitability.

**Inclusion** is the process of increasing the degree of participation of all citizens in society, including people with disabilities and other people who are members of low-mobility groups.

**Regions of NPP presence** are the territories where the company's main production facilities are located.

**Nuclear facilities** - nuclear power plants, nuclear heat supply plants, research nuclear reactors, radioactive waste treatment facilities (except for facilities included in the technological cycle of a nuclear facility or radioactive waste disposal facilities), storage facilities facilities intended for storage of spent nuclear fuel or high-level radioactive waste with a design storage period of more than 30 years (except for facilities included in the technological cycle of a nuclear facility), facilities intended for disposal of spent nuclear fuel or radioactive waste.

All other terms are used in the meaning given in the legislation of Ukraine.

1. GOAL AND OBJECTIVES IN THE FIELD OF CORPORATE SOCIAL RESPONSIBILITY AND SUSTAINABLE DEVELOPMENT

**2.1** The company's goal in the field of corporate social responsibility and sustainable development is to promote the development of society through the company's voluntary contribution to the social, economic and environmental spheres related to the activities and achievement of the company's strategic goals and sustainable development goals:

**social goal** - development of the potential of the company's employees, ensuring occupational safety and health, creating conditions for self-fulfilment and professional development, contribution to solving socially significant problems and development of communities in the regions of NPP presence;

**economic goal** - achievement of profitability indicators through efficient and economical use of resources, introduction of the latest technologies, continuous improvement of production processes, transparent and open business, filling the budget through the payment of taxes, fees, other payments, implementation of investment projects, support of economic and social development projects in the regions of location NPPs and other Energoatom facilities;

**environmental goal** - preservation of natural systems and reduction of anthropogenic impact on the environment in the area of nuclear power facilities, rational use of natural resources, reduction of carbon footprint and implementation of climate adaptation practices, ensuring environmental safety during production activities, which will contribute to the environmental component of sustainable development.

**2.2** The priority Sustainable Development Goals for Energoatom are as follows:

 -good health and well-being;

- quality education;

- affordable and clean energy;

- decent work and economic growth;

- industry, innovation and infrastructure;

- sustainable development of cities and communities;

- responsible consumption and production;

- mitigating the effects of climate change;

- partnership for sustainable development.

**3 PRINCIPLES OF CORPORATE SOCIAL RESPONSIBILITY AND SUSTAINABLE DEVELOPMENT**

**3.1** Adherence to the principles of corporate social responsibility and sustainable development is an important component of Energoatom's activities, namely:

- strict compliance with the legislation of Ukraine;

- compliance with ethical and international standards of behavior;

- integration with the Company's strategic goals;

- zero tolerance to corruption;

- respect for the interests of stakeholders;

- ensuring decent and safe working conditions;

- priority of preserving the life and health of the company's employees;

- minimizing the impact on the environment;

- support and development of local communities;

- transparency and accountability;

- respect for human rights and inclusiveness by protecting personal rights, freedoms and interests, equal opportunities, a culture of respect and trust among employees and in relations with partners;

- effective management of sustainable development risks, in particular the risks of climate change, social conflicts, and community instability;

- adherence to the principles of safety culture.

1. **PRIORITY AREAS OF CORPORATE SOCIAL RESPONSIBILITY POLICY FOR ACHIEVING SUSTAINABLE DEVELOPMENT GOALS**

Energoatom, the sole shareholder of which is the state represented by the Cabinet of Ministers of Ukraine, is committed to ensuring energy security, energy efficiency and competitiveness of its Affiliates and the Company as a whole, guided by the 17 UN Sustainable Development Goals by 2030, 10 principles of the UN Global Compact, the national standard ISO 26000: 2019 "Social Responsibility Guidelines", the Energy Strategy of Ukraine until 2050 and the Strategic Development Plan of Energoatom.

The Energoatom Company defines the following priority areas of corporate social responsibility policy to achieve sustainable development goals:

* 1. **ENSURING NUCLEAR AND RADIATION SAFETY**

4.1.1 NNEGC Energoatom is one of the world's leading nuclear energy companies in terms of technologies and safety of nuclear power plants. The Company is aware of its responsibility for ensuring safe, reliable and cost-effective operation of nuclear facilities, protection of nuclear facilities, setting the highest priority of its activities to protect personnel, the public and the environment from unacceptable radiation exposure during commissioning and operation of nuclear facilities.

4.1.2 In its activities, the Company

- complies with the rules and regulations on nuclear and radiation safety;

- bears full responsibility for nuclear and radiation safety of nuclear facilities at all stages of the life cycle;

- maintains and improves the safety level of nuclear facilities based on the obligations under the Convention on Nuclear Safety and requirements of national and international nuclear and radiation safety standards and regulations, as well as operating experience;

- prevents abnormal operation and emergencies, improves safety of nuclear facilities;

- maintains constant communication with the public, informing about the safety status and activities aimed at improving the safety level;

- ensures continuous monitoring and analysis of the safety of nuclear facilities.

* 1. **RELIABLE AND SAFE ELECTRICITY GENERATION**

4.2.1 The main priority of the operating organization, JSC Energoatom, is to ensure safe, reliable and efficient operation of the Company's NPPs for the sustainable development of the Ukrainian economy, welfare of the Company's employees and other persons.

4.2.2 In order to ensure safe production of clean and cheap electricity, the greatest attention is paid to the condition of the main equipment. That is why all repairs of power units at nuclear power plants are carried out in accordance with the schedules. NNEGC Energoatom fully complies with all detailed safety improvement activities, which is the key to accident-free operation of the company's nuclear facilities.

**4.3 HEALTH AND SAFETY AT WORK**

4.3.1 The company has implemented a health and safety management system that is constantly being improved in order to eliminate or reduce the risk of exposure to hazardous factors for the company's personnel and other persons (contractors) related to the company's production activities and working under the company's control.

4.3.2 As a component of the health and safety management system, the Company shall operate an occupational safety management system in accordance with the requirements of the applicable law.

4.3.3 The Company strives to achieve zero occupational accidents and reduce the risk of occupational diseases.

4.3.4 In its activities, the Company:

- provides safe and harmless working conditions aimed at minimizing negative labor factors;

- continuously improves the health and safety management system in accordance with the requirements of the national standard DSTU ISO 45001:2019 (ISO 45001:2018 IDT) "Health and Safety Management Systems. Requirements and guidelines for use";

- regularly conducts high-quality training of employees on occupational health and safety;

- fully provides production personnel with personal and collective protective equipment;

- ensures safe operation of equipment and safe production and technological processes;

- fosters a culture of more responsible attitude to occupational health and safety in employees;

- takes measures aimed at reducing occupational injuries and preventing occupational diseases.

**4.4 TRANSPARENCY AND ACCOUNTABILITY**

4.4.1 NNEGC Energoatom is a reliable, trusted, informative and timely source of information on nuclear energy for Ukrainian citizens and the international community. The Company uses easy and understandable language and convenient means of communication for all target groups.

4.4.2 In its activities, the Company is guided by the principles of accountability and transparency for the society and all stakeholders:

- comply with the requirements of the legislation on disclosure of public information, accounting and reporting, and audit of financial statements;

- fully, accurately, timely and clearly disclose information in reports and documents submitted by the Company to state supervisory (control) authorities, the shareholder and other stakeholders;

- apply high standards of integrity and ethics to employees at all levels;

- ensure systematic dissemination of objective, reliable information on the Company's goals, objectives, current and future activities;

- timely and fully inform the public and stakeholders about its activities and the results of the independent audit through communication channels;

**4.5 ENVIRONMENTAL PROTECTION AND ENVIRONMENTAL SAFETY**

4.5.1 The Energoatom Company is aware of its responsibility to the present and future generations for the impact of its production activities on the environment. Environmental care is an integral part of the Company's social responsibility. The Energoatom Company carries out systematic work to ensure environmental safety, economical and careful attitude to natural resources.

4.5.2 The Company's primary objective is safe production of environmentally friendly electricity with continuous improvement of environmental safety during construction, commissioning, operation and decommissioning of nuclear facilities and other production facilities of the Company.

4.5.3 NNEGC Energoatom maintains high standards of environmental policy. The Company cares about reducing the negative impact on the environment and maintaining biodiversity, rationally uses natural resources, and takes measures to preserve the climate.

4.5.4 The Company guarantees the safe operation of NPPs and other Company facilities and produces environmentally friendly low-carbon electricity with minimal impact on climate change. It systematically integrates the best environmental practices and strives to rationally use natural resources with the implementation of energy-efficient solutions.

4.5.5 In its activities, the Company:

- strictly complies with the requirements of environmental legislation, regulations and other documents in the field of protection, use and reproduction of natural resources, ensuring environmental safety, prevention and elimination of the negative impact of economic and other activities on the environment;

- continuously improves environmental management systems in accordance with the requirements of the international standard ISO 14001:2015 "Environmental Management System. Requirements for application";

- improves corporate policies aimed at reducing environmental risks, complying with national and international legislation and using best practices in this area;

- regularly monitors the environmental condition on the territory of the sites, the sanitary protection zone and the observation zone of the Company's nuclear facilities;

- creates a modern radioactive waste management infrastructure at the sites of the Company's nuclear facilities;

- develops a culture of more conscious attitude of employees, the public and all stakeholders of the Energoatom Company to the environment and rational use of natural resources.

4.5.6 The Energoatom Company complies with the requirements of the legislation for access to public information and the right to access information on the state of the environment.

**4.6 SOCIAL PROTECTION AND OBSERVANCE OF EMPLOYEES' RIGHTS**

4.6.1 Employees are the main value and strategic resource of Energoatom JSC. The Company strives to be the best employer and become a place for professional fulfillment of the most talented and highly qualified personnel.

4.6.2 In its activities, the Company:

- is guided by the labor legislation and the Collective Agreement of the Company;

- provides equal opportunities and conditions for career and professional development of all employees;

- creates decent working conditions and constantly improves them, guided by the safety, production, sanitary and hygienic and social factors;

- provides social protection to employees in accordance with the law and the Company's Collective Agreement;

- respects human rights and prohibits any form of discrimination, prohibits mobbing;

- promotes gender equality;

- invests in professional training and personal development of employees;

- develops and implements educational and awareness-raising activities aimed at career guidance for youth and students and raising the prestige of engineering education in Ukraine;

- implements mechanisms of trustful communication with employees and ensures proper resolution of labor disputes.

**4.7 DEVELOPMENT OF LOCAL COMMUNITIES**

4.7.1 In the regions where NPPs are located, the Company does everything possible to improve the quality of life of the communities, as Energoatom employees should have comfortable conditions for work and rest. To this end, the company uses social partnership. Together with local communities, authorities and employees, the Company improves the living standards in the towns of the regions where the Company's nuclear facilities are located and other areas of operation by implementing social programs that promote social and economic development.

4.7.2 Priority of the Company's social policy in the regions where the Company's nuclear facilities are located are:

- comprehensive improvement of the quality of life of Energoatom employees, their families and the population of the regions where nuclear facilities are located;

- improvement of living conditions of the local population and economic growth, which is ensured through the payment of taxes, fees and other payments to local budgets and employment of residents;

- financing of housing and communal services and social and cultural facilities. These social infrastructure facilities include health resorts for staff rehabilitation and health improvement, sports centers for employees and their families, cultural and business centers, recreation centers, halls of residence, hotels, etc;

- support for volunteering and corporate charity;

- preservation of cultural heritage;

- support for education, physical culture and sports.

The company uses the best practices of social responsibility and looks up to domestic and international initiatives.

**4.8** **INTERACTION WITH STAKEHOLDERS**

4.8.1 NNEGC Energoatom builds relations with stakeholders on the basis of equal dialogue and partnership, mutual responsibility and consideration of interests.

4.8.2 Basic principles of interaction with stakeholders:

- timeliness, completeness, reliability, and accessibility of information about the company's activities (except for restrictions established by law)

- equality of rights of all stakeholders to receive information without giving preference to one group of information recipients over another;

- convenience and acceptability of mass media and information channels for target audiences and stakeholders;

- prompt response to information requests;

- creation of the most effective conditions for conducting a dialogue with stakeholders, using the most convenient platforms, forms and methods of communication;

- taking into account the opinions of stakeholders when making decisions related to the current and future activities of the Energoatom Company.

4.8.3 The stakeholders of the Energoatom Company are:

inside the Company: employees of the Company; primary trade union organizations.

outside the Company: population of Ukraine; state authorities; state supervision (control) bodies; shareholders and investors; partners and contractors; scientific and expert community; media; civil society institutions, environmental, sectoral and anti-corruption non-governmental organizations; international non-profit environmental and energy organizations, responsible business institutions; local governments and local communities.

**4.9 FIGHTING CORRUPTION**

4.9.1 As a guarantee of sustainable development and within the framework of the implementation of the 10 principles of the UN Global Compact, the Company shall adhere to zero tolerance to corruption in any of its forms and manifestations, take all measures provided for by law to prevent, detect and combat corruption and related actions.

4.9.2 The Company has implemented an Anti-Corruption Program based on unconditional compliance with anti-corruption legislation, taking into account international standards for combating corruption. The Company systematically improves the implemented anti-corruption policy, striving to further strengthen anti-corruption efforts and make the Company's contribution to the development of the state's anti-corruption policy.

1. **RESPONSIBILITY FOR POLICY IMPLEMENTATION**
	1. The Supervisory Board of the Company: approves the Policy, ensures its integration into the overall development strategy of the Company, and exercises general supervision over its implementation.
	2. In order to coordinate the implementation of the Policy, provide methodological support and ensure interaction with other divisions and external stakeholders, a coordination board or a working group or other corporate social responsibility body may be established.
	3. The responsibility for disclosing information on the implementation of this Policy lies with the Strategic Communications Directorate and the public relations and media units of affiliated NPPs.
	4. Heads of structural and separate subdivisions of the Company: implement elements of the Policy within their competence, organize the implementation of relevant programs and activities.
	5. Employees of the Company are obliged to comply with the principles of the Policy in their daily activities.
2. **MECHANISMS FOR IMPLEMENTING THE POLICY**

6.1. Integration of the Policy into the Company's strategy: all areas of the Policy are integrated into the strategic and operational planning of Energoatom's activities.

* 1. Implementation of programs and initiatives: approval and implementation of targeted programs, projects and initiatives in the areas of environmental protection, community support, ethics and transparency, gender equality, occupational safety, etc.

6.3 Stakeholder engagement: ongoing communication with internal and external stakeholders, including employees, communities, authorities, the scientific community, environmental organizations, and business partners.

6.4 Partnerships with international organizations: participation in global sustainability initiatives, including the UN Sustainable Development Goals, and partnerships with relevant international institutions.

6.5 Development of corporate culture: training employees in the principles of corporate social responsibility and sustainable development, encouraging them to participate in initiatives, and fostering responsible attitudes towards the environment, ethics, and inclusion.

6.6 Information transparency: regular informing of the society about the Policy implementation through official channels, public reports and social networks.