APPROVED

by the Decision of the Supervisory Board of JSC NNEGC Energoatom, dated 11.07.2025, Minutes of Meeting No. 10

**RULES**

**of business ethics of the Joint-Stock Company**

**"National Nuclear Energy Generating Company "Energoatom"**

**GENERAL PROVISIONS**

The Rules of Business Ethics (hereinafter referred to as the Rules) is a document that establishes fundamental corporate values and summarizes ethical and moral standards, rules of business conduct adopted and supported by the top management and each employee of JSC NNEGC Energoatom (hereinafter referred to as the Company) in the performance of their duties regardless of the level of their position.

The Rules regulate the development of corporate culture and ensure that the Company's employees maintain high standards of behavior traditional for the nuclear power industry. The corporate culture of the company is based on a system of values, norms, traditions, rules and behavioral models that shape the atmosphere in the company and determine the interaction between its management bodies, employees and partners.

The Company's core values, mission, and goals are aimed at ensuring energy independence and energy security of the state, safety of personnel and the public, safe and reliable electricity generation, sustainable economic development, and a carbon-free energy future for Ukraine.

The Chairman and members of the Supervisory Board, CEO and members of the Executive Board, heads of all management levels, employees and representatives of Energoatom are obliged to know the Rules and realize that their behavior shapes their personal reputation and may affect the reputation of the Company.

**TERMS**

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| **Company’s image** | the image that is formed in the society and among business partners. The basis of the image is the existing style of internal and external business relations of employees, their behavior and official attributes - the name, logo of JSC NNEGC Energoatom. |
| **Corporate culture** | a set of rules and peculiarities of the Company's and individuals' activities, which establishes that all employees of the Company adhere to the norms of corporate ethics  |
| **Leader** | is a person who inspires others, encourages them to make the right independent decisions and actions and influences them to achieve the Company's goals. If necessary, a leader intervenes in the activities of other employees, correcting their behavior, attitudes and perceptions, and motivates them to perform actions, focus their minds, make decisions, actively support positive changes and strive for excellence  |

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| **Leadership** | is a model of employee behavior, regardless of their level, position and status, in which an employee inspires by the own example, introducing coaching, influences and shapes employee behavior patterns in order to achieve the highest level of work quality |
| **Mobbing** | 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, his/her business reputation, including with the aim of acquiring, changing or terminating his/her labor rights and obligations, manifested in the form of psychological and/or economic pressure, in particular through the use of electronic communications, creating a tense, hostile, offensive atmosphere towards the employee, including one that makes him/her underestimate |
| **Company’s reputation** | social assessment (opinion) formed in the society and among business partners based on socially significant actions of the Company  |

The Company assumes responsibility for ensuring nuclear, radiation, industrial and fire safety of nuclear facilities, their sustainable operation, protecting nuclear facilities and personnel, maintaining decent working conditions and ensuring stable operation of the nuclear power complex.

Managers of all levels of the Company's management are responsible for the compliance of their subordinates with the requirements of the Rules, help them to correctly interpret the rules and norms of ethical behavior and set an example of high business ethics.

The Company expects that current or potential partners share the values and principles, rules of business ethics of the Company.

**COMPANY'S MISSION**

## Safe and reliable electricity generation for energy security, energy independence, safety of life and population, sustainable economic development and carbon-free energy future of Ukraine.

**COMPANY'S GOAL**

## To be the world's leading power generating company in the field of nuclear energy through

## stable and safe operation of nuclear facilities;

## generation of electricity and heat in strict compliance with the established safety level;

## modernization of NPP process equipment and construction of new power units using modern world technologies;

## effective corporate governance;

* growth of production potential;
* improving the living standards of employees.

**CORPORATE VALUES OF THE COMPANY**

## JSC NNEGC "Energoatom" establishes the following core corporate values:

## The main value of Energoatom is its employees, who, with their qualifications, ensure the achievement of the Company's goals in accordance with the tasks assigned;

## ensuring the unconditional priority of safety in the performance of labor duties by the Company's employees;

## continuous improvement of the safety culture and security culture at all levels of the Head Office and branches of the Company;

## development of leadership in safety issues and all activities of the Company

## ensuring reliability, high quality, competence, responsibility and experience in the process of organizing and performing work;

## continuous development of professional potential and equal conditions for career growth;

## knowledge management in the field of nuclear energy use and radiation safety;

## ensuring conditions for professional succession;

## respect for personal rights and interests of the Company's employees;

## respect for the terms of cooperation offered by business partners;

## integrity and prevention of corruption;

## ensuring corporate social responsibility;

## transparency, openness and efficiency of the Company's activities;

## continuous development of all areas of the Company's activities, encouraging the introduction of constructive changes.

**JSC NNEGC "Energoatom" appreciates in its employees and their work**

## personal awareness of the importance of safety;

## commitment to the principles of safety culture and security culture;

## compliance with the requirements of physical protection procedures, access control and intra-facility regimes in the Head Office and separate subdivisions of the Company;

## responsibility and self-control in the performance of all activities that affect the safe operation of NPPs;

## focus on competence and high level of professional training;

## conscientious attitude to their work duties, initiative and activity in their performance;

## professionalism in work and desire to improve professional level;

## ability to work in a team;

## discipline and responsibility in the performance of assigned tasks;

## honesty, integrity and goodwill;

## communication skills, commitment to full and accurate exchange of information;

## caution and prudence in the performance of duties;

## understanding of their job responsibilities and their relationship with the tasks and functions of their unit and the Company;

## striving for continuous improvement of production processes, safety and quality of performance of their work duties;

## faithful implementation of the requirements of the Anti-Corruption Program and the internal documents of the Company adopted for its implementation.

**BASIC RULES AND PRINCIPLES OF BUSINESS BEHAVIOR**

## The Company builds its activities on the principles of strict compliance with the requirements of the legislation of Ukraine and strives for maximum transparency in its actions and decision-making. The Company's employees shall cooperate with each other and form relationships with the Company's business partners based on the principles of respect, honesty, non-discrimination and good faith.

## This includes honesty in financial reporting and openness to all stakeholders, subject to the limitations set by law. All actions of the Company comply with both national and international legal standards and its internal policies.

**Safety as an absolute priority. Prevention of damage from production activities to the environment, health and safety of the Company's employees and the public.**

By demonstrating commitment to this principle, the Company, through its employees:

## sets an unconditional priority for safety;

## ensure compliance with the requirements of legislation, norms and rules in the field of nuclear energy use, radiation safety and environmental protection at all stages of the life cycle of nuclear facilities, during the management of radioactive waste and other sources of ionizing radiation

## analyzes risks associated with activities and constantly minimizes them;

## declares the priority of finding and eliminating problems, as well as preventing problems and inconsistencies related to the human factor in ensuring NPP safety;

## continuously improves processes and methods of work, increases productivity and efficiency;

## assumes responsibility for the safety of the company's employees and the safety of the public in accordance with the requirements of the law;

## maintains the health of employees at an appropriate level;

## uses nuclear materials in accordance with the principle of non-proliferation regime;

## ensures the implementation of measures for the physical protection of nuclear facilities, nuclear materials, radioactive waste, and other sources of ionizing radiation;

## takes measures to improve accounting and control of nuclear materials;

## ensures the implementation of measures necessary to prevent nuclear terrorism threats.

## **Leadership as a tool for achieving the highest level of performance quality.**

## Committed to this principle, the company expects all employees to demonstrate leadership, promotes leadership development in all areas of activity, as a leader

## is a personal example of personal responsibility for nuclear and radiation safety for all employees of the Company;

## personally supports and ensures nuclear and radiation safety as a top priority;

## demonstrates and maintains a high level of employee engagement;

## provides positive feedback on the desired/expected model of behavior;

## creates an atmosphere of openness that encourages employees to further improve activities, processes and working conditions;

## analyzes the causes of staff mistakes, does not jump to conclusions and does not blame employees without understanding the situation;

## creates an atmosphere in which employees feel personally responsible for the results of their work and the achievement of common success;

## tolerantly criticizes the state of affairs when he/she is aware of non-compliance with accepted standards in terms of behavior or work performance, which ensures that employees understand the non-compliance and eliminate it;

## supports the use of benchmarking, internal and independent assessments, operational experience, and staff training for continuous improvement;

## encourages the identification, reporting and remediation of problem areas, and promotes the use of human error prevention techniques to avoid violations;

## practicing and developing the skills necessary to increase leadership potential;

## is actively involved in the process of staff development and mentoring, sharing personal knowledge of the industry, professional and leadership experience;

## identifies employees with leadership potential in advance and provides support to new leaders.

**The professionalism of Energoatom employees is a guarantee of reliable and accident-free operation of NPPs and ensuring the required level of nuclear, radiation and industrial safety of Ukraine.**

Following this principle, the Company

## acts in accordance with the requirements of the labor legislation of Ukraine, the Charter and the current Collective Agreement of the Company;

## ensures compliance with the requirements of the rules and regulations on personnel training in the field of nuclear energy use and radiation safety;

## select employees for positions based solely on the level of competence and professional qualifications;

## respect employees and treat them tolerantly and fairly;

## appreciates the contribution of each employee to the achievement of the Company's goals;

## encourages any feedback that is important for safe and efficient work: supports the submission of proposals for improvement; information about violations is analyzed and considered as invaluable experience for improving production;

## creates and maintains appropriate working conditions for employees of the company and contractors at the workplace;

## creates conditions for the professional development of employees aimed at improving the quality of work performed and achieving the goals set.

**Openness and truthfulness are the way to strengthen the reputation of Energoatom.**

Showing commitment to this principle, the Company, through its employees

## in cooperation with the state authorities, provides complete and reliable information about its activities;

## strives to build and maintain healthy, constructive and open relationships;

## takes care of its reputation, strictly adheres to the norms and rules of business ethics and law;

## in its relations with business partners, strives for long-term and mutually beneficial cooperation; is guided by the principles of priority of the Company's interests, objectivity and economic feasibility; always strives to fulfill its obligations and expects its partners to fulfill their obligations;

## makes investment decisions on the basis of appropriately verified and confirmed data, calculations of the payback period of investments and the expected rate of return;

## values active interaction with the manager and with each other to create an atmosphere of openness and trust in the team;

## supports a culture of "no blame" reporting, which promotes full disclosure of dangerous or unethical actions, incidents, and shortcomings; and the use of such information to improve the Company's operations;

## provide reliable information to the company's external auditors who audit or evaluate financial performance.

**Relationships between employees based on compliance with the rules of business ethics are the key to the success of Energoatom.**

By showing commitment to this principle, the company

## values its employees and expects high standards of corporate ethics and professional achievements from them;

## encourages employees for their success in work;

## respects personal freedom, human rights and dignity and does not allow any form of discrimination or pressure on employees in the performance of their work duties;

## encourages employees to observe such ethical rules as politeness, goodwill and respect in their relations with colleagues and third parties;

## develops leadership as the ability to make decisions at all levels. Each employee is expected to realize personal responsibility for the fulfillment of assigned tasks;

## appreciates the initiative and maximum contribution of each employee to solving the Company's tasks. The performance of each employee affects the overall performance and is the key to the Company's success in carrying out its production activities and performing the functions of an operating organization;

## supports the implementation and dissemination of a “no blame” policy as the basis for a culture of fair relations and trust, in which employees feel comfortable enough to report mistakes without fear of being punished.

## builds relationships between subordinate employees and managers on the principles of respect, discipline and compliance with the chain of command, faithful performance of both their direct job duties and other tasks of managers that are not specified in job descriptions but directly relate to the scope and specifics of the company's business unit.

**Zero tolerance to corruption.**

Showing its commitment to this principle, the Company

## proclaims that the Chairman and members of the Supervisory Board, the CEO and members of the Executive Board, heads of all management levels, employees and representatives of NNEGC Energoatom in their activities, as well as in legal relations with business partners, state authorities, local governments, other legal entities and individuals, are guided by the principle of "zero tolerance" to any manifestations of corruption and abuse in their activities;

## ensure the effective implementation of the Company's Anti-Corruption Program, corruption risk management system, conflict of interest management policy, other measures to prevent and combat corruption, annual monitoring and reporting on such measures;

## provide incentives for managers at all levels of management to demonstrate leadership in combating and detecting corruption;

## seeks to cooperate with business partners who share the values set forth in the Anti-Corruption Program, the Compliance Policy of JSC NNEGC "Energoatom" and these Rules;

## guarantees confidentiality to persons who have reported corruption or corruption-related offenses committed by the Company's employees or facts of incitement of the Company's employees to commit corruption or corruption-related offenses and provides conditions for whistleblower protection.

**RESPECT FOR HUMAN RIGHTS. INCLUSIVENESS AND DIVERSITY**

## Fully complying with the Constitution of Ukraine, international treaties and legislation of Ukraine, Energoatom guarantees equal opportunities for career, professional and personal growth to all employees of the Company, provides flexible working conditions for parents of both sexes and remunerates each employee according to their contribution to the Company's development.

## The Company provides equal opportunities for all employees and declares the inadmissibility of discrimination on the basis of race, skin color, nationality, citizenship, ethnic, social and foreign origin, political, religious and other beliefs, gender, gender identity, sexual orientation, marital and property status, age, health, disability, language or other characteristics.

## The Company makes every effort to ensure decent working conditions and safety, and strives to create a working environment that promotes the development of creativity and mutual respect in the team.

## The use of child labor and forced labor is prohibited.

**CONFIDENTIALITY AND DATA PROTECTION**

## The Company is committed to complying with national and international data protection regulations and ensuring the confidentiality of information. Transparency in the collection, use and storage of personal data is a mandatory requirement for maintaining trust.

## Each employee must comply with the requirements of the Company's internal documents governing access, use and disclosure of Confidential Information, and comply with the requirements for ensuring confidentiality established by Energoatom, including

## not to use or disclose information that has become known in connection with the performance of their employment duties for the purpose of obtaining personal benefit or causing damage to the company;

## be aware of the responsibility for the use and storage of trade secrets and confidential information of the company.

**INFORMATION SECURITY**

## Each employee shall comply with the requirements of the Company's internal documents governing access, use and disclosure of the Company's trade secrets and confidential information. Discussion or transfer of confidential information and documents related to trade secrets by employees to unauthorized persons is prohibited.

## The Company respects the right of each employee and contractor to confidentiality and ensures compliance with the requirements of Ukrainian legislation in the field of personal data protection.

## The Company does not allow the dissemination of false information, distortion of facts that may harm it, its partners and the country as a whole.

## **PRINCIPLES OF INTERACTION**

## **Relationship between the Company's employees.**

## Employees should cooperate with each other and form relations based on the principles of honesty and non-discrimination, treat each other with courtesy and respect.

## Employees are prohibited from engaging in mobbing, including

## behave in an aggressive, hostile or offensive manner towards other people, including raising your voice, threatening violence or dismissal;

## humiliate, intimidate or verbally abuse others;

## morally harass colleagues (which includes professional and psychological harassment, social isolation within the company, incitement to moral persecution).

## Any behavior that creates a threatening, hostile or humiliating atmosphere for an employee or other person who is in the premises or on the territory of the company is considered a violation of these Rules and is grounds for disciplinary action.

## **Relations with contractors.**

## The Company values the development and maintenance of partnership based on long-term cooperation, mutual benefit, respect, trust and fairness, objectivity. The Company shall fulfill its obligations to business partners in good faith under the terms of contracts, agreements, and contracts, and shall require the same from them.

## The Company conducts a careful selection of counterparties and seeks to cooperate with partners who have an impeccable reputation and are not under sanctions, comply with the law and generally accepted standards of corporate and business ethics.

## Guided by high ethical standards of behavior, the principles of legality and the rule of law, respecting the rights, legitimate interests, honor, dignity, and business reputation of its partners, the company remains persistent and principled in defending its rights and interests. At the same time, the Company always resolves all misunderstandings that arise in the course of its activities in a legal manner, negotiating and trying to reach a compromise. Employees of the Company shall not disclose information about business partners that may lead to material or moral damages to the Company and/or the business partner, unless the information is provided in accordance with the law.

**Relations with media representatives.**

## The Company constantly interacts with the media (mass media) and builds relations on the principles of openness and transparency, efficiency and readiness for dialogue, and compliance with high ethical standards of communication.

## The Company does not allow the dissemination of false information or distortion of facts that may harm the Company, its partners and the country as a whole. Only the Chairman and embers of the supervisory board, the CEO, members of the Executive Board and authorized persons of the company may speak publicly on behalf of the Company in the media and at other events with the participation of media representatives. Other employees should avoid any statements or expressions that may be perceived as the official position of the company and affect its reputation. The transmission of information and documents to the media by unauthorized persons is a violation of the rules of business ethics.

## **ENVIRONMENT**

Energoatom strives to prevent and minimize adverse environmental impact at all stages of the production process, to use resources rationally, and to protect biodiversity and ecosystems.

The Company expects its employees to make efforts to reduce their impact on the environment and climate by rationally saving water and electricity, reducing the number of trips by car, reducing waste and ensuring its proper recycling and disposal.

The Company pays maximum attention to improving the environmental situation in the regions of its business presence and preserving the environment for future generations.

**FINAL PROVISIONS**

The obligation to comply with all provisions of these Rules without exception is an obligation of the employees and is an integral part of their employment agreement (contract).

All employees of the Company must be familiarized with the Rules, including during the employment process, and understand that their violation may be grounds for disciplinary action.

The unit responsible for human resources management shall familiarize employees with these Rules during employment with the Company.

The Supervisory Board shall approve these Rules, amend and supplement them, and determine the methods of implementing these Rules, including upon the proposal of the Company's Executive board.

The text of the Rules shall be posted on the official website of JSC NNEGC Energoatom.

In case of violation of the Rules, an employee may be brought to disciplinary responsibility. In the event of a violation of the law by an employee or a contractor, the Company reserves the right to transfer information about the violation to law enforcement agencies to bring the perpetrators to administrative or criminal liability.