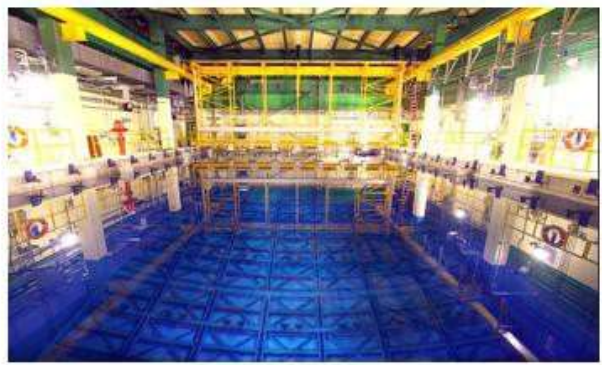


# Nuclearelectrica

## Business Partners' Integrity Guide



*We are building a sustainable future for tomorrow's generation*

SN Nuclearelectrica carries on its activity in a responsible manner, in a safety environment, with the highest degree of integrity, in compliance with the professional laws and rules.

We are guided by and committed to fundamental values: professional excellence, safety and sustainability, care for employees, empathy, and responsibility, sustainable development.

Openness and transparency build credibility and trust between partners. We expect our business partners manage their processes in an ethical and responsible manner, acting with integrity.

We consider that the observance of the ethics and compliance standards is a special factor in promoting our business relationships and we insist, including through contractual clauses, that partners comply with the rules and regulations in force.

Anti-corruption policy of SN Nuclearelectrica (SNN) includes the concepts of the national laws in the matter, the internal codes of conduct and good practices generated by the international anti-corruption standards and anti-bribery standard ISO 37001. Our code of ethics and conduct provides clear directives to employees regarding the manner in which ethical decisions should be made. The code of ethics and conduct and the program of ethics and compliance of SNN can be found [here](#)

## Purpose

Business Partners' Integrity Guide expands the principles emphasized in the Anti-corruption Policy of SNN, establishes the expectations relating to the manner in which business partners carry on their activity, emphasizes the significance of compliance with the laws and national and international regulations.

SNN expects its business partners communicate the provisions of this guide to its employees, subsidiaries and subcontractors involved in contractual relationships with SNN.

We mention that any law prevails over the rules provided for in this guide provided that the guide comprises stricter provisions or rules of conduct.

# 1. Health, safety and environment

*We generate clean energy at standards of excellence*

Health and safety of staff, environmental protection are our main priorities. We expect our partners comply with all laws and regulations applicable to the jurisdiction in which they carry on their activity, ensure and support:

- a safe working environment, defined by policies and practices intended to protect health and safety of employees, contractors or visitors, intended for mitigating or removing occupational accidents or activities affecting health;
- compliance with the environmental regulations, specific reporting requirements, obtaining permits or licenses necessary for carrying out the activity, imposed by the environmental rules and minimizing harmful effects over the community;
- active management of environmental risks occurring during carrying out activities, including the supply chain.

# 2. Human rights

*The human resource is a driving engine of the nuclear industry, and the safeguard for nuclear safety.*

SNN expects its business partners carry on their operations in a responsible, non-discriminatory manner, in compliance with the rights of the people they hire. For this purpose, it is necessary:

- to support and observe human rights, diversity and equal opportunities at the workplace, no matter the social or ethnical origin, religion, age, gender, political beliefs or any other criteria;
- to ensure a dignified, respectful, correct, non-discriminatory treatment or without any harassment, by free expression of concerns, without the fear of retaliation.

Business partners must comply with the applicable laws and regulations in the field of labour relationships and prove that:

- they comply with the provisions of employment agreements, especially with legal rules regarding salary and number of hours worked;
- they do not use or promote fraudulent or deceptive recruitment, instead they

support diversity and equal opportunities in the selection and recruitment process;

- they support voluntary organization of workers by associations or trade unions, for the purpose of promoting their rights and interests;
- they adopted a disciplinary and complaint mechanism addressed to employees and intended for any concerns related to work, conduct or breaches of the code of conduct, encouraging employees to openly communicate with the management as regards the working conditions without fear of harassment, intimidation or retaliation.

## 3. Integrity and ethical conduct in business

*Nuclearelectrica's management and its staff comply with the concept of zero tolerance to corruption, being firmly committed to comply with national legislation and the applicable regulatory framework.*

### 3.1 Preventing the conflict of interests

Any personal or business relation is based on trust. Situations leading to or likely to give rise to a conflict between Nuclearelectrica interests and those of our partners affect the business relationships.

SNN employees should act in the company interest and we expect our partners support us in this respect. Employees should not develop any relationship with a partner which could generate a conflict, being bound to act in SNN interest. Business partners - SNN employees' relationships shall not be used to influence their professional reasoning.

Relationships likely to represent a conflict of interests either for partner, or for SNN should be disclosed. Partners shall advise SNN management or shall use the non-compliance reporting form. The form is available on SNN site [here](#).

### 3.2 Anti-corruption

Nuclearelectrica's management and its staff comply with and maintain the concept of zero tolerance to corruption, taking and giving bribes, being firmly committed to comply with national legislation and the applicable regulatory framework. Anti-corruption Policy of SNN establishes principles for all SNN employees and its business partners, being intended to encourage and facilitate prevention and control of corruption actions.

SNN or its business partners' employees shall not accept or request any personal favours or on behalf of others, in relation to the negotiation or conduct of SNN activity,

they shall not promise or offer any gifts, invitations of hospitality or to entertainment events, with the intent to determine the recipient to act in favour or to the disadvantage of SNN.

Favours or promises, such as offers to hire a relative of a SNN employee or of a governmental official, or to offer a discount which is not provided for in common practices, might be construed as a bribe.

We expect our partners meet the legal compliance requirements in business relationships and interactions with the public and private sector. Any business relation or interaction with civil servants should be in strict compliance with the applicable laws.

### 3.3 Gifts and hospitality

Business partners should not offer any gifts, gratuities or invitations to events to a SNN employee, if this influences or could be perceived as influencing a decision in relation to a certain business partner.

Gifts of small value can be received if this practice is conducted in a fair, transparent and verifiable manner, and its frequency does not create any suspicion of a conflict of interests, does not represent any breach of professional deontology. Gifts have a limited and reasonable value and they are not the result of any expectations of influencing business decisions.

If a business partner is satisfied that a gift or an invitation to an event complies with SNN procedures, it should consult with the manager of the recipient concerned or with the ethics and compliance service of SNN. We anticipate that business partners keep adequate records relating to the offer of gifts/invitations to events, intended for SNN employees or received from SNN employees.

### 3.4 Compliance with the competition laws

Competition has an important role in guaranteeing consumer welfare, achievement of an efficient allocation of resources and price optimization, quality and innovation promotion. Business partners should not enter into any official or informal anti-competition forms, arrangements establishing prices, truncating or limiting the offer, they should not exchange any information about prices with their competitors, they should not participate in any activities restricting or affecting competition illegally.

### 3.5 Handling of privileged information

Business partners which under certain circumstances have access to any privileged

information obtained during their business relationships with SNN, should not use such information for trading or for allowing others to trade any shares or securities.

## 4. Management responsibility

*We expect our business partners manage their processes in an ethical and responsible manner, acting with integrity*

As business partner, you shall adopt or establish a management system consistent with the principles mentioned in this Guide, allocating the necessary resources to develop a process of identification, monitoring and dealing with risks related to the breach of such principles, maintaining a self-assessment and documenting system of this process.

We expect our business partners provide their employees or third parties the access to the adequate channels of reporting non-compliances, without fear of retaliation and pay attention inclusively to anonymous reporting.

## 5. Reporting

*We request our partners to inform us about any situation likely to be a conflict of interests*

In the development of contractual relationships with SN Nuclearelectrica, we request our partners to contact us if they have any information or reasonable suspicion regarding actual or potential breaches of law or of the principles mentioned in this guide.

Prompt reporting is important and it can be sent through:  
-SNN Management

-Dedicated portal, available on site: [www. nuclearelectrica.ro](http://www.nuclearelectrica.ro), under heading “Whistleblower”, where the Non-conformity Reporting Form can be accessed;  
-Email to address [sesizari@nuclearelectrica.ro](mailto:sesizari@nuclearelectrica.ro) and [conformitate@nuclearelectrica.ro](mailto:conformitate@nuclearelectrica.ro) managed by the Ethics and Compliance Service.

Nuclearelectrica interdicts retaliation or retaliation threats against any person reporting actual or potential breaches of law, non-conformities regarding the performance of contracts or compliance with procedures. Nuclearelectrica examines carefully the integrity issues reported and takes the necessary steps, if appropriate.

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For any comments or questions related to this Guide please contact us  
[conformitate@nuclearelectrica.ro](mailto:conformitate@nuclearelectrica.ro)

