

NUCLEARELECTRICA

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- Resource and Circular Economy
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- Affected communities
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S.N. Nuclearelectrica S.A.

# 2025 SNN Group Consolidated Sustainability Report

March 2026



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# SNN Group ESRS 2 Bases for preparation of the Sustainability Report



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# SNN Group Bases for preparation

## General basis for preparation of the Sustainability Report | BP-1

Societatea Nationala Nuclearelectrica S.A. (hereinafter referred to as the Company or SNN<sup>1</sup>) publishes its eighth Sustainability Report for the period 1 January - 31 December 2025, consolidating in its reporting also the subsidiaries, as listed below. Sustainability reporting allows the SNN Group<sup>2</sup> to exhibit its ESG (environmental, social and governance) performance and reinforce its commitment to sustainable development in a way that can be evidenced to both internal and external stakeholders. Since the SNN Group will fall under the scope of the Corporate Sustainability Reporting Directive (CSRD) and,

<sup>1</sup> Consisting of the following SNN entities: the Headquarters, Cernavoda NPP, and Pitesti NFP

<sup>2</sup> The term SNN Group is used in this report to refer to all the entities included in the reporting (SNN Headquarters, Cernavoda NPP, Pitesti NFP, and the subsidiaries FPCU Feldioara, ErgoNuclear and NuclearelectricaServ)

therefore also under the scope of the European Sustainability Reporting Standards (ESRS), in order to meet these requirements, the Company has decided to prepare its Sustainability Statement as part of its 2025 Annual Report. In compliance with Order No. 85/2024 for the regulation of sustainability reporting issues and aligning with the European legislation on EU Regulation 852/202 – EU Taxonomy, this sustainability report details our Company's efforts and achievements in the area of sustainable practices. The report includes specific measures taken to improve environmental, social and governance (ESG) performance, while ensuring transparency and compliance with national and European legislative requirements.

For the year 2025, the SNN Group has continued ESG reporting according to ESRS, aiming to improve the process as much as possible. The sustainability statement is underpinned by the results of the double materiality assessment, according to the ESRS. The double materiality assessment conducted in previous years has been revised and enhanced, ensuring that all sub-topics and sub-sub-topics found in the ESRSs are taken into account, and that all impacts, risks, and opportunities that the SNN Group may have on various sustainability-related subjects are addressed.

According to the results of the double materiality assessment, the topics ESRS E1 – Climate Change, S1 – Own Workforce, and G1 – Professional Conduct are considered the most significant sustainability matters, followed by S4 – Consumers and End-Users (a new topic addressed for the current year), S2 – Workers in the Value

Chain (specifically the sub-topic of Health and Safety for Workers in the Value Chain), E5 – Resource Use and Circular Economy, S3 – Affected Communities, E4 – Biodiversity and Ecosystems, E3 – Water and Marine Resources, the additional topic Nuclear Safety, and E2 – Pollution.

This Report shows the consolidated activity data at SNN Group level for the entire 2025 financial year, as well as the collected value chain information. Where appropriate, strategic targets, action plans for the future, measures and proposed actions have been introduced. The consolidation scope is the same as for the financial statements, including the entities listed below.

Annual reporting covers all the activities of S.N. Nuclearelectrica S.A., which are carried out 100% in Romania, in accordance with the legal provisions in force. S.N. Nuclearelectrica S.A. is a national joint stock company, managed under a single – tier system, with **Headquarters** in Bucharest, Sector 1, Bulevardul Iancu de Hunedoara, nr. 48, and other two entities and three subsidiaries listed below.

**The Nuclear Power Plant Branch** (hereinafter referred to as "NPP") Cernavoda supports operation of the two functional Nuclear Units, Unit 1 and Unit 2, based on CANDU 6 technology (Canada Deuterium Uranium), as well as the management of all SNN assets of Cernavoda (Units 1 and 2 in operation, Units 3 and 4 are in various stages of construction; for Unit 5, the Company's shareholders approved the change of initial application as early as March 2014, and this would be used to support the activities



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related to operation of Units 1 and 2, as well as the district heating system).

The **Nuclear Fuel Plant** branch in Pitesti (hereinafter referred to as Pitesti “NFP”) produces CANDU 6 nuclear fuel bundles for Units 1 and 2 of Cernavoda.

S.N. Nuclearelectrica S.A. also holds 3 subsidiaries and is actively involved in Special Purpose Vehicle set up for development of small modular reactors:

- **EnergONuclear** subsidiary (hereinafter referred to as “EN”) – is the Special Purpose Vehicle in charge of building, commissioning and operating Units 3 and 4 of Cernavoda NPP.
- The subsidiary **Fabrica de Prelucrare a Concentratelor de Uraniu Feldioara** (hereinafter referred to as “FPCU” Feldioara) – processes the technical-grade uranium concentrates to obtain the sintered UO2 powders needed for production of the nuclear fuel bundles at Pitesti NFP Branch.
- The subsidiary **Nuclearelectrica Serv** (hereinafter referred to as “NS”) provides critical services that support the core business, i.e. production of electricity.

As of 2022, Societatea Nationala Nuclearelectrica S.A. has been holding 50% of the shares of RoPower Nuclear SA, the Special Purpose Vehicle set up to develop small modular reactors – SMRs in Romania.

Reporting is not limited to the Company's own operations, as information about the upstream and downstream value chain is also included. The impact materiality assessment includes impacts related to SNN Group's own operations

and its value chain, including its products and services, as well as its business relationships, particularly regarding the workers in the value chain and the health and safety measures the SNN Group considers for them, and its relationships with suppliers, customers, business partners, or the local communities.

When assessing the materiality for each impact, risk, or opportunity, the stakeholders affected by a given phenomenon and its localization within the company's own operations or in one or more points of the value chain, have been duly taken into account. Once an impact, a risk or an opportunity has been identified as material, the Company identifies the relevant information to be considered for disclosure under ESRS, or prepares a relevant entity – specific disclosure. Management has a holistic approach to inclusion of the ESG criteria into the SNN Group's strategy and development plans. This holistic approach is broken down across the entire Company and SNN Group collaborators into established processes and procedures, and particularly into objectives and targets cascaded from the fundamental objectives of the SNN Group, down to an individual level, through the set performance metrics. Information about the value chain is found in the chapters addressing the thematic standards.

The policies and actions presented in the Report target the affected stakeholders in its own operations or in the value chain depending on the subject. Where appropriate, strategic targets were introduced and extended to the value chain.

Value chain data or information has been included in the report's theme sections, depending on availability and the

extent to which the SNN Group has access to such data and/or information. In the current report, emphasis has been placed on areas of the value chain where the SNN Group holds sufficient control and influence to significantly impact, positively or adversely, a given phenomenon or a stakeholder within its own operations or at one or more points along the value chain.

The SNN Group has not omitted information about intellectual property, know – how or innovation results. For the current year, as required by the Corporate Sustainability Reporting Directive (CSRD), the report has been audited by an independent third party to ensure the accuracy and transparency of the information presented. The external audit represents the Company's commitment to sustainable practices and corporate responsibility, providing stakeholders with additional assurance on the veracity of reported data and compliance with required standards.

The double materiality assessment process is an ongoing process, which is determined and can be influenced by changes in the Group's strategy, business model, value chain and general context of operation. The double materiality assessment process may also be impacted over time by any adopted standards specific to the sector in which the Group operates. The double materiality assessment process may not include all the impacts, risks and opportunities or aspects to be mentioned that are specific to each stakeholder and that they may consider important in their own analysis.



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### Disclosures concerning the specific circumstances | BP-2



#### Changes in preparation or presentation of sustainability information

For the financial year 2025, a double materiality assessment was re-assessed, in accordance with the ESRS standards with a view to complying with the Corporate Sustainability Reporting Directive (the CSRD Directive). Thus, according to RC – 00 – 14 procedure, the material topics identified for the previous fiscal year and those identified according under the ESRS were updated.

The identified impacts, risks, and opportunities have been rewritten where necessary to make sure that they clearly and concisely meet the requirements and definitions set forth by the ESRS standards. These can be seen in the new wording at the beginning of each theme chapter.

Unlike previous exercises, the analysis for this period also focused on identifying impacts, risks, and opportunities at

sub-topic and sub-sub-topic level (as defined in accordance with the ESRS requirements), thereby providing enhanced granularity and detail.

In terms of the sustainability assessment, the SNN Group is assessed annually by international bodies/rating agencies, which issue an annual rating based on the sustainability report assessment and the relevant policies. If need be, certain information disclosed under the ESRS is supplemented by additional information to meet the requirements of the rating agencies' criteria, with presentation of how certain metrics evolve over more consecutive years, and analyse that indicator's development trend.

#### Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

The applicable laws or other standards used for reporting purposes are indicated, as applicable, in the text of the report.

#### Incorporation by reference

The report makes references to additional documents or to information included in another chapter, corresponding to a thematic standard in this report, as follows:

- Estimation and uncertainty of the information, details of estimates and subsequent changes in the materiality of the impacts referred to in *"Material Impacts, Risks and Opportunities, and their Interaction with the Business Strategy and Model"* (SBM – 3).
- Estimation and uncertainty of the information on the targets set for each area (if applicable) reference in

the chapters related to the indicators: E1 – 4, E1 – 6, E2 – 3, E3 – 3, E4 – 4, E5 – 3, S1 – 5, S2 – 5, S3 – 5 and additional topics).

- Estimation and uncertainty of information on the methods and calculations referred to in the chapter *"Health and safety indicators"* (S1 – 14)
- The use of transitional provisions reference to material aspects listed in *"Material Impacts, Risks and Opportunities, and their Interaction with the Business Strategy and Model"* (SBM – 3)
- Information supplied to the undertaking's administration, management and supervisory bodies and sustainability matters approached by them reference to the chapter *"Material Impacts, Risks and Opportunities, and their Interaction with the Business Strategy and Model"* (SBM – 3) for impacts identified in the materiality assessment process.
- Hyperlinks to listed documents for more details or references outside the Sustainability Report's scope.
- Specific references mentioned in sections of the Sustainability Report to other sections (if applicable).

#### Estimation and uncertainty of information

The quantification of greenhouse gases is inevitably subject to significant uncertainty as a result of both scientific and estimation uncertainty. Estimation uncertainty may arise due to:

- The inherent uncertainty in quantifying input data, such as activity data and emission factors, which are used in mathematical models to estimate emissions (measurement uncertainty);
- the impossibility for these models to accurately and precisely characterise the relationships between



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various inputs and the resulting emissions in all circumstances (model uncertainty); and

- the fact that uncertainty may increase as quantities of emissions with different levels of measurement and calculation uncertainty are aggregated (aggregation uncertainty).

The method used to calculate the Scope 3 carbon footprint, Category 1. Purchased Goods and Services and Category 2: Capital Good, is the spend-based method, using accounting data and further on the association with emission factors from international databases (UK DEFRA, via the CarbonSaver platform). The level of accuracy is dependent on the inclusion of a purchased service or good in the correct emission factor category in the databases, and therefore exceeds the ability to verify with full accuracy. No accuracy improvements can be made in this area at this time. On the remaining reporting categories there are data with a high level of accuracy given the supporting documents: contracts, invoices, authority reports, etc.

In the current report there are several sources of estimates based on information from along the value chain as well as from the calculations of quantitative data used for reporting on specific indicators. The main sources and elements of uncertainty are presented in the following table:

Area where estimates or uncertainties have occurred	Source of estimate or uncertainty	Explanation
<b>Materiality assessment</b>	Estimating the likelihood and severity of impacts on human rights impacts.	The current impacts were given a maximum likelihood score as an estimate. Human rights impacts were prioritised in terms of severity
	Estimating the materiality of impacts. For impacts, a weighted average was estimated between the categories of decision-making stakeholders (70%), and non-decision-making and external stakeholders (30%).	More details of estimates and subsequent changes in the materiality of the impacts are referred to in <i>"Material Impacts, Risks and Opportunities, and their Interaction with the Business Strategy and Model"</i> (SBM – 3)
<b>Targets per ESG areas</b>	The targets were estimated on the basis of data published in the previous year and taking into account the expansion of production capacity until 2030.	The targets set for each area (if applicable) can be found in the indicator chapters: E1 – 4, E1 – 6, E2 – 3, E3 – 3, E4 – 4, E5 – 3, S1 – 5, S2 – 5, S3 – 5 and additional topics).
<b>Carbon footprint calculation</b>	More details on the estimates, assumptions or uncertainties are partially elaborated in the <i>topic</i> chapters E1 – 6 or fully explained in the carbon footprint report.	
<b>Health and safety metrics</b>	Methods used to calculate health and safety indicators	Methods and calculations are explained in the chapter <i>"Health and safety indicators"</i> (S1 – 14)



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### Use of transitional provisions

The following transitional provisions have been used for current reporting, as listed in the table below. For all material topics identified as significant, listed in the chapter *"Material Impacts, Risks and Opportunities, and their Interaction with the Business Strategy and Model"* (in line with indicator SBM – 3), the relevant company policies and actions have been mentioned, as well as any specific indicators measured. Impacts have been identified on each material topic that emerged as significant from the materiality assessment, and a brief description has been given of how the business model or Company's directions address these impacts. This information is presented under chapters specific to each material topic (topic, sub-topic, or sub-sub-topic).

Topical ESRS	Disclosure Requirements	Full name of the disclosure requirement	Phase – in
ESRS 2	SBM-3: 48(e)	Material impacts, risks and opportunities and their interaction with strategy and business model	Omission of information on anticipated financial effects (qualitative data) for the first year.
ESRS 2	SBM-3: 48(e)	Material impacts, risks and opportunities and their interaction with strategy and business model	Omission of information on the anticipated financial effects (quantitative data) for the first three years.
ESRS E1 – Climate change	E1-9: 66 (c), 68 (a – b), AR 70, AR 69 (a – b), AR 71 (b), AR 72 (a – b), AR 73 (a), AR 76 b,	Anticipated financial effects from material physical and transition risks and the potential climate-related opportunities	Omission of information on anticipated financial effects provided in E1 – 9 (qualitative data) for the first year.
ESRS E1 – Climate change	E1-9: 66 (a, b, d), 67, 69 (a – b), AR 70, AR 71, AR 73 (a – b), AR 74 (c, d, e), AR 76, AR 80, AR 81.	Anticipated financial effects from material physical and transition risks and the potential climate-related opportunities	Omission of information on the anticipated financial effects provided in E1 – 9 (quantitative data) for the first three years.
ESRS E2 – Pollution	E2-6: 39 (a, b, c) 41, AR 33.	Anticipated financial effects from pollution-related impacts, risks and opportunities	Omission of information on anticipated financial effects provided in E2 – 6 (qualitative data) for the first year.
ESRS E2 – Pollution	E2-6: 39 (a) 40 (a, b, c) AR 31, AR 32, AR 34	Anticipated financial effects from pollution-related impacts, risks and opportunities	Omission of information on the anticipated financial effects provided in E2 – 6 (quantitative data) for the first three years.
E3-5 – Water and marine resources	E3-5: 33 (a, b, c) AR 33	Anticipated financial effects from impacts, risks and opportunities related to water and marine resources	Omission of information on anticipated financial effects provided in E3 – 5 (qualitative data) for the first year.
E3-5 – Water and marine resources	E3-5: 33 (a), AR 34	Anticipated financial effects from impacts, risks and opportunities related to water and marine resources	Omission of information on the anticipated financial effects provided in E3 – 5 (quantitative data) for the first three years.
E4-6 – Biodiversity and ecosystems	E4-6: 45 (a), AR 40	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Omission of information on anticipated financial effects provided in E4 – 6 (qualitative data) for the first year.
E4-6 – Biodiversity and ecosystems	E4-6: 45 (b – c), AR 39	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Omission of information on the anticipated financial effects provided in E4 – 6 (quantitative data) for the first three years.
E5-6 – Resource use and circular economy	E5-3: 43 (a), AR 36	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	Omission of information on anticipated financial effects provided in E5 – 6 (qualitative data) for the first year.
E5-6 – Resource use and circular economy	E5-3: 43 (a – c), AR 35	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	Omission of information on the anticipated financial effects provided in E5 – 6 (quantitative data) for the first three years.



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## SNN Group Governance

### Role of Administration, Management and Supervisory Bodies | GOV-1



The corporate bodies of S.N. Nuclearelectrica S.A. (hereinafter referred to as "SNN"), a company managed under single-tier system, are represented in the General Meeting of Shareholders (GMS), which is the ultimate decision-making forum of SNN, as well as in the Board of Directors (BoD).

Under the Resolution of the SNN's Ordinary General Meeting of Shareholders no. 1 of 27 January 2021, shareholders took note of the Updated Regulation on the organisation and performance of the General Meetings of Shareholders, accommodating the legislative amendments.

The Regulation on the Organisation and Conduct of GMSs (updated in 2020) documents all amendments and supplements to the legal provisions laid down in the Financial Supervisory Authority (ASF) Regulation no. 5/20218, Law no. 24/2017 on the issuers of financial instruments and market operations, republished, as subsequently amended and supplemented, Law 31/1990 of the Companies, and Government Emergency Ordinance no. 109/2011 on corporate governance of public undertakings, as subsequently amended and supplemented. The updated Regulation on the Organisation and Conduct of GMSs is public on the SNN website under the section dedicated to the General Meetings of Shareholders. The section intended for the GMS can be accessed on the SNN website and is being constantly updated, after each decision of the Board of

Directors approving a GMS convening. The Regulation on the Organisation and Conduct of the General Meetings of Shareholders are easily accessible, and information material is available for each GMS.

According to the Articles of Association of SNN, the Company is managed by a Board of Directors, consisting of 7 (seven) members of which at least 4 (four) members must be independent directors according to the Government Emergency Ordinance 109/2012 as subsequently amended and supplemented. The CN SNN's Board of Directors members are all non-executive and 5 independent, according to the information included in the table below. They are elected for a 4-year term of office, or for the remaining period until the end of a 4-year term, and may be re-elected. The members of the Board of Directors are elected by the Ordinary General Meeting of Shareholders, according to the legal provisions. The members of the Board of Directors of SNN have committed under their mandate contracts to exercise their mandate with the prudence and diligence of a good director, with loyalty, in the interest of the Company, its stakeholders and society at large.

The membership of SNN's Board of Directors of is presented below. More information can be read on the Company's website:

<https://nuclearelectrica.ro/ir/en/corporate-governance/administration-council/>



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SNN Board of Directors							
No.	Name and year of birth	Position	Relevant experience	Date appointed	Term of office expiry date	Political affiliation	Status
1	<b>Mrs. Grajdan Vasilica 1974</b>	Independent non-executive member	Relevant experience in labour relations/negotiations with trade unions	15.02.2023	15.02.2027	No political affiliation	Final
2	<b>Mr. Dumitru Chirlesan 1963</b>	Independent non-executive member	Experience in applied physics in the field of nuclear materials and technologies. He also has a rich technical, academic and management experience.	15.02.2023	15.02.2027	No political affiliation	Final
3	<b>Mr. Laurentiu Nicolae Cazan 1982</b>	Chairman of the Board of Directors – independent non-executive member	Experience in the legal field, including expertise that covers complex areas ranging from law and public policy to diplomacy and national security.	24.11.2025	15.02.2027	With political affiliation	Final
4	<b>Mr. Andrei Gabriel Benghea Malaies 1980</b>	Independent non-executive member	Experience in the and private business environment, having heled executive and non-executive positions within the national energy system.	24.11.2025	15.02.2027	No political affiliation	Final
5	<b>Mrs. Nina Popa 1967</b>	Non-independent non-executive member	Experience in economics and finance, asset management and enterprise restructuring programmes related to economic operators.	24.11.2025	15.02.2027	No political affiliation	Final
6	<b>Mr. Ionel Bucur 1953</b>	Non-independent non-executive member	Experience in the nuclear industry, reactor physics, nuclear facilities and systems and nuclear asset management. He also has wide senior management experience.	24.11.2025	15.02.2027	With political affiliation	Final
7	<b>Mr. Gheorghe Ionita – 1956</b>	Independent non-executive member	Long managerial experience in the nuclear field and in research	24.11.2025	15.02.2027	With political affiliation	Final
8	<b>Mrs. Elena Popescu – 1959</b>	Independent non-executive member	PhD in energy engineering, specific expertise in the nuclear field	28.09.2022	24.04.2025	No political affiliation	Revoked under the OGMS Resolution no. 5/24.04.2025



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SNN Board of Directors							
No.	Name and year of birth	Position	Relevant experience	Date appointed	Term of office expiry date	Political affiliation	Status
9	<b>Mr. Cosmin Ghita 1989</b>	Independent executive member	Background in international political economy, CEO of SNN	29.09.2022	24.04.2025	No political affiliation	Revoked under the OGMS Resolution no. 5/24.04.2025
10.	<b>Mr. Remus Vulpescu – 1971</b>	Independent non-executive member	Background in law and politics, lawyer, administration experience	15.02.2023	24.04.2025	No political affiliation	Revoked under the OGMS Resolution no. 5/24.04.2025
11.	<b>Mr. Dr. Teodor Chirica 1945</b>	Independent non-executive member	Engineer, specialising in nuclear energy, with technical and management experience.	29.09.2022	24.04.2025	No political affiliation	Revoked under the OGMS Resolution no. 5/24.04.2025
12.	<b>Mr. Oleg Burlacu 1977</b>	Independent non-executive interim member	Background in law, lawyer, administration experience	24.04.2025	23.09.2025	With political affiliation	Revoked effective 23 September 2025
13.	<b>Mr. Petre Iulian Nicolaescu 1977</b>	Independent non-executive interim member	Background in law, and experience in politics and administration	24.04.2025	24.11.2025	With political affiliation	Revoked under the OGMS Resolution no. 12/24.11.2025
14.	<b>Mr. Pavel Casian Nitulescu 1973</b>	Independent non-executive interim member	Background in energy engineering, and experience in administration and management.	24.04.2025	24.11.2025	With political affiliation	Revoked under the OGMS Resolution no. 12/24.11.2025
15.	<b>Mr. Ionut Purica 1954</b>	Independent non-executive interim member	Background in energy engineering: University Professor and member of the Sustainable Development Advisory Board	24.04.2025	24.11.2025	No political affiliation	Revoked under the OGMS Resolution no. 12/24.11.2025
16.	<b>Mr. Dan Artur Stratan 1962</b>	Independent non-executive interim member	Background in energy engineering, and experience in administration	03.09.2025	24.11.2025	With political affiliation	Revoked under the OGMS Resolution no. 12/24.11.2025
17.	<b>Mr. Mihai Dorin Pena 1982</b>	Independent non-executive interim member	Background in IT engineering, and management experience	03.09.2025	24.11.2025	No political affiliation	Revoked under the OGMS Resolution no. 12/24.11.2025



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### Board of Directors of the subsidiaries

FPCU Feldioara	
Director office no.	Name and first name
1	Mrs. Bacaintan Cristina
2	Mrs. Vlasceanu Silvia
3	Mrs. Dobre Raluca
4	Mr. Foghis Adrian George

EnergoNuclear	
Director office no.	Name and first name
1	Mr. Negru Antonie Marius
2	Mr. Grigorean Vlad
3	Mr. Simion Paul Eduard

NuclearelectricaServ	
Director office no.	Name and first name
1	Mrs. Dobrica Anca Ioana
2	Mr. Dolha Mircea
3	Mr. Roibu Dragos Stefan

The Board of Directors delegates the management of the Company to one or more Executive Officers, naming one of them as CEO. The CEO represents the Company in relations with third parties and before the courts of law. The CEO is responsible for taking all measures related to the management of SNN, within the scope of the Company's business and observing the exclusive powers reserved under the law or the Articles of Association to the Board of Directors and to the General Meeting of Shareholders. If need be, the Board of Directors may delegate, under a duly passed resolution, one or more of powers stated as belonging to the CEO. The membership of SNN Group's Executive Management is shown in the table below and on the Company's website:

<https://nuclearelectrica.ro/ir/en/corporate-governance/directors/>



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### Executive management and branches managers

Name and year of birth	Position	Relevant experience	Date appointed	Term of office expiry date	Political affiliation	Status
<b>Cosmin Ghita - 1989</b>	CEO	Background in international political economy; experience in diplomatic communication and economic field	12.02.2023	12.02.2027	Without political affiliation	Final
<b>Daniel Adam – 1979</b>	CFO	Economic background; management experience in finance, in industries such as holding, printing	01.11.2024	15.02.2027	Without political affiliation	Final
<b>Romeo Urjan – 1960</b>	Cernavoda NPP Branch Manager	Experience in nuclear industry, including nuclear power plant operation, construction and commissioning, nuclear safety and staff training.	01.04.2025	Employment agreement	Without political affiliation	
<b>Andrei Musetoiu – 1976</b>	Pitesti NFP Branch Manager	Background in mechanics, business management and nuclear technologies; management experience in the Technical Directorate of Pitesti NFP	19.12.2023	Employment agreement	Without political affiliation	Final

According to the Company's Articles of Association and in line with the Government Emergency Ordinance no. 109/2011, and as per the requirements of the Bucharest Stock Exchange's Code of Corporate Governance, the Board of Directors of SNN Group has established 6 advisory committees, each formed by at least 2 members of the Board of Directors. The Advisory Committees are tasked with performance of analyses and making recommendations for the Board of Directors, in specific fields, and are under obligation to regularly submit activity reports to the members of the Board of Directors. These committees are listed in the table below.



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## Management of advisory committees

Committee	Members
Nomination and Remuneration Advisory Committee	2022 - 24.04.2025
	- Vasilica Grajdan – Chairwoman
	- Elena Popescu – Member
	- Remus Vulpesco – Member
	08.05.2025 - 26.09.2025
	- Laurentiu Nicolae Cazan – Chairman
	- Vasilica Grajdan – Member
	- Oleg Burlacu – Member
	26.09.2025 – 05.12.2025
	- Vasilica Grajdan – Chairwoman
	- Dan Artur Stratan – Member
	- Mihai Dorin Pena – Member
05.12.2025 – 31.12.2025	
- Gheorghe Ionita – Chairman	
- Vasilica Grajdan – Member	
- Laurentiu Nicolae Cazan – Member	

Committee	Members
Audit Advisory Committee	2022-24.04.2025
	- Remus Vulpesco – Chairman
	- Vasilica Grajdan
	- Dumitru Chirlesan
	08.05.2025- 26.09.2025
	- Vasilica Grajdan – Chairwoman
	- Oleg Burlacu – Member
	- Dumitru Chirlesan – Member
	26.09.2025 – 05.12.2025
	- Dumitru Chirlesan – Chairman
	- Mihai Dorin Pena – Member
	- Vasilica Grajdan – Member
05.12.2025 – 31.12.2025	
- Andrei Gabriel Benghea Malaies – Chairman	
- Vasilica Grajdan – Member	
- Nina Popa – Member	

Committee	Members
Nuclear Safety Advisory Committee	2022 – 24.04.2025
	- Teodor Chirica – Chairman
	- Elena Popescu – Member
	- Cosmin Ghita – Member
	- Dumitru Chirlesan – Member
	08.05.2025- 26.09.2025
	- Pavel Casian Nitulescu – Chairman
	- Dumitru Chirlesan – Member
	- Ionut Purica – Member
	26.09.2025 – 05.12.2025
	- Pavel Casian Nitulescu – Chairman
	- Dumitru Chirlesan – Member
- Ionut Purica – Member	
05.12.2025 – 31.12.2025	
- Ionel Bucur – Chairman	
- Dumitru Chirlesan – Member	
- Gheorghe Ionita – Member	



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Committee	Members
Advisory Committee for Strategy, Development and Large Investment Projects	2022 – 24.04.2025
	- Elena Popescu – Chairwoman
	- Cosmin Ghita – Member
	- George Niculescu – Member
	- Teodor Chirica – Member
	08.05.2025- 26.09.2025
	- Oleg Burlacu – Chairman
	- Pavel Casian Nitulescu – Member
	- Laurentiu Nicolae Cazan – Member
	- Ionut Purica – Member
- Petre Iulian Nicolescu – Member	
26.09.2025 – 05.12.2025	
- Dan Artur Stratan – Chairman	
- Pavel Casian Nitulescu – Member	
- Mihai Dorin Pena – Member	
- Ionut Purica – Member	
- Petre Iulian Nicolescu – Member	
05.12.2025 – 31.12.2025	
- Ionel Bucur – Chairman	
- Gheorghe Ionita – Member	
- Laurentiu Nicolae Cazan – Member	

Committee	Members
Risk Management Advisory Committee	2024 – 24.04.2025
	- Elena Popescu – Chairwoman
	- Teodor Chirica – Member
	- Remus Vulpescu – Member
	08.05.2025-26.09.2025
	- Ionut Purica – Chairman
	- Pavel Casian Nitulescu – Member
	- Petre Iulian Nicolescu – Member
	26.09.2025 – 05.12.2025
	- Ionut Purica – Chairman
	- Pavel Casian Nitulescu – Member
	- Petre Iulian Nicolescu – Member
	05.12.2025 – 31.12.2025
- Laurentiu Nicolae Cazan – Chairman	
- Andrei Gabriel Benghea Malaies – Member	
- Ionel Bucur – Member	

Committee	Members
ESG Advisory Committee	08.05.2025- 26.09.2025
	- Petre Iulian Nicolescu – Chairman
	- Vasilica Grajdan – Member
	- Dumitru Chirlesan – Member
	26.09.2025 – 05.12.2025
	- Petre Iulian Nicolescu – Chairman
	- Vasilica Grajdan – Member
	- Dumitru Chirlesan – Member
	05.12.2025 – 31.12.2025
	- Vasilica Grajdan – Chairwoman
	- Dumitru Chirlesan – Member
	- Ionel Bucur – Member
- Nina Popa – Member	

As of 2024, as decided by the Board of Directors, the Working Group for ESG management at SNN Group level on the basis of the European CSRD/ESRS Directive was also established to cover the supply chain.

This ESG Working Group has representatives for each ESG pillar (environment, social and governance) in each SNN Group entity, including financial and risk, depending on the relevant expertise of each member.



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## Membership of the ESG Working Group

Item no.	Name	Position	Role in the ESG Working Group
1	Mihai Gioara	Chief Development Officer and Participations Management	Group Coordinator
2	Luciana Elena Petrescu	Director of Communication, Sustainability and Public Relations Directorate	Member
3	Valentina Dinu	Head of Communication, Sustainability and Investors Relations Directorate	Member
4	Vlad Chiripus	Head of Legal and Corporate Governance Directorate	Member
5	Ioana Maxim	Head of Financial Reporting and Budget Department	Member
6	Liviu Dumitru Radu Gheorghiu	Chief Engineer in the Prevention and Protection Department	Member
7	Loredana Macaneata	Director of the Strategy and Human Resources Directorate	Member
8	Monica Anton	Head of SMR	Member
9	Florenta Irina Marin	Head of Management Systems Development and Monitoring Department, Cernavoda NPP	Member
10	Daniela Isaila	DDMSM – Department for the Development and Monitoring of the Management Systems	Member
11	Romeo Urjan	Chief Nuclear Safety Officer	Member
12	Andrei Musetoiu	Deputy Chief Executive Officer of Pitesti NFP	Member

Item no.	Name	Position	Role in the ESG Working Group
13	Vasilica Olaru	Head of Nuclear Safety Department, Pitesti NFP	Member
14	Daniela Costea	Chief Engineer with the Quality Management Directorate, Pitesti NFP	Member
15	Roxana Caradima	Head of the Nuclear Safety and Permitting Unit	Member
16	Gelu Agafiel Maracineanu	Deputy Chief Executive Officer, FPCU Feldioara	Member
17	Bianca Nan	FPCU Feldioara	Member
18	Dan Tudor	Chief Executive Officer, NuclearelectricaServ	Member
19	Iulia Belu	Head of Human Resources and General Secretariat Department	Member
20	Alexandru Havris	Chief Executive Officer EnergoNuclear	Member
21	Marian Mihaita Ene	Principal Engineer, EnergoNuclear	Member
22	Cosmin Anghel	Manager of the Information Technology and Information Security Directorate	Member
23	Alexandru Anita	Head of the Ethics and Integrity Service	Member
24	Alexandru Musat	Head of the Treasury Department	Member
25	Vladut Voicu	Head of Administrative Service	Member
26	Corina Nicolescu	Head of the Procurement Planning and Reporting Service	Member



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The administrative management include members who provide reasonable diversity in terms of gender, professional experience, age, and functional competencies, as well as comprehensive level representativeness for the entire SNN Group. In order to sit in the Board of Directors, a person must meet a number of criteria, according to the selection procedure that can be read on the Company's website. The administrative management is provided under a one-tier system, without worker representatives.

Throughout 2025, all changes accounted, as many as 27 members sat in the Boards of Directors (including of subsidiaries), 7 of whom were women (25.9%). At the end of financial year 2025, these Boards of Directors had 17 members, 6 of whom were women (35.2%).

As at 31 December 2025, 5 (71%) of the 7 members of SN Nuclearelectrica SA's Board of Directors are declared independent.

The names of the members of the Board of Directors, the Executive Management or the Advisory Committees, including information or their CVs are posted on the SNN website at the following link

<https://nuclearelectrica.ro/ir/en/corporate-governance/administration-council/>

**CN SNN's Board of Directors has various responsibilities concerning:**

- Comply with the performance indicators, and apply the financial and non-financial indicators according to the GMS resolutions and the legislative orders.
- Attain the objectives and key indicators, including the duty to attain the contract-set performance.
- Contribute to the budget and business plan, and get involved in preparation of the Company's budget and activity programme.
- Participate in meetings and sit in committees, and take active part in the meetings of the Board and the advisory committees.
- Discharge of the Chairman duties (where applicable), and fulfil the obligations laid down in the Articles of Association, the internal regulations and the legislation.
- Take part in GMS meetings, and actively participate in, and support the GMS resolutions.
- Represent the company in the cases provided by the law, or under express delegation.
- Prepare and send out the company's reports to various authorities.
- Propose and approve the development directions.
- Select and appraise the executives, and take part in the executive recruitment, dismissal, appraisal and remuneration determination process.
- Oversee internal audit, approve the head of internal audit, and receive the internal audit reports.
- Ensure the control, and check the functioning, of the Internal Management System.
- Manage conflicts of interest, make referral of, and disclose conflicts, however, refraining from making

- any decisions on such cases.
- Comply with legal obligations and professional ethics.
- Act with loyalty and diligence, and carry out the office with prudence and to the best interest of the Company.
- Carefully manage of all confidential information of the Company.
- Approve major transactions, and seek approval for transactions the value of which exceeds 10% of the net assets or turnover.
- Advise shareholders on certain transactions, and providing the Company with the necessary documentation.
- Provide protection for the Company's assets, and take appropriate measures to preserve them.
- Oversee legal compliance of the operations with the articles of association and the legislation.
- Put in place a climate of respect and fairness, and promote the values of respect, good practice and non-discrimination across the Society.
- Take active part in the decision-making processes, vote in all Board meetings and sign the meeting minutes.
- Take up financial and organizational responsibilities, determine the accounting policies and financial control, approve the planning, and make recommendation of profit allotment.
- Convene or organize EGMs, and implement their resolutions.
- Account for their own performance in an assessment report.
- Promote a positive image of the Company and avoid harming its reputation.



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- Take part in professional training programmes.
- Be bound by non-disclosure duties also after the end of their office, and abide by the post-office restrictions.
- Observe the relevant legislation, implement the EGM resolutions, and comply with the applicable regulatory acts.

**There are also a number of policies and commitments approved by the Board of Directors.**

- ESG Policy (environment/social/governance)<sup>3</sup>
- Commitment to respect human rights<sup>4</sup>
- Commitment to ensure environmental protection<sup>5</sup>
- Commitment to observe ESG principles<sup>6</sup>

The Advisory Committees listed above are composed of at least 2 members of the Board of Directors, covering different and specific areas of responsibility, and are required to submit periodic activity reports.

The role of the Audit Advisory Committee is to provide assistance to the Board of Directors in carrying out its internal audit duties, and performs an advisory function concerning the Company's strategy and policy on the internal control system, internal audit and external audit, as well as control of material risks management. The Audit Advisory Committee regularly examines the financial reporting efficiency, the internal control and the risk management system put in place by the SNN Group.

As to risk management, the Committee's role is to:

- monitor the effectiveness of the Company's internal control, internal audit, where applicable, and risk management systems;
- review the internal control and risk management system efficiency.

The Advisory Committee for Strategy, Development and Large Investment Projects pursues any opportunity that might be relevant and achievable for the SNN Group.

The impacts of the SNN Group on the external environment are assessed in accordance with the materiality assessment and mitigation or prevention measures are put in place or pipelined for adverse impacts, or maintenance and enhancement plans for positive ones. The ESG Committee and the ESG Working Group, as well as other relevant stakeholders, as described in the materiality assessment sub-chapters, are primarily responsible for identifying and assessing impacts in the environmental, social, or governance areas.

The role of the Advisory Committees is to periodically submit activity reports to the Board of Directors on each particular area of responsibility. On a quarterly basis, the Director of Audit and Risk Management Directorate (DAMR) submits and discusses with the Audit Committee the risk management report prepared by the Risk Management Service, after

having been approved by the CEO. The results of the double materiality assessment, which addresses all the impacts, risks and opportunities presented and detailed herein, are reviewed and approved by the Board of Directors.

In addition to the Advisory Committees, which have overall oversight and assessment responsibility for impacts, risks and opportunities, each department is responsible for managing impacts, risks or opportunities specific to the core activities carried out in that department. In SNN, risks are managed according to the procedure MR-00-01 – Risk Management in SNN. Risks are identified/analysed/reported by the department heads on a quarterly basis, and the results are centralized in the Quarterly Risk Management Report. The report is cleared by the Management Internal Control System (SCIM) Monitoring Committee and is approved by the Chief Executive Officer. Then, the Report is submitted to the Risk Management Advisory Committee (RMAC) and is sent out for information to the Board of Directors.

RMAC aims to provide the BoD with support in overseeing the Company's management of key risks, including strategic and operational risks, as well as the risk monitoring and mitigation guidelines, policies and processes.

The governance bodies oversee the targets set in the previous year and through the strategy devised in 2025 and effective implementation of the investment projects on the basis of which the targets have been set. The relevant experience of each member of the Board of



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<sup>3</sup> [https://www.nuclearelectrica.ro/tr/wp-content/uploads/sites/9/2023/07/Politica-ESG\\_RO\\_20230310\\_.pdf](https://www.nuclearelectrica.ro/tr/wp-content/uploads/sites/9/2023/07/Politica-ESG_RO_20230310_.pdf)

<sup>4</sup> [https://www.nuclearelectrica.ro/tr/wp-content/uploads/sites/9/2023/07/SNN\\_Angajament\\_Drepturile-omului\\_RO\\_20230530.pdf](https://www.nuclearelectrica.ro/tr/wp-content/uploads/sites/9/2023/07/SNN_Angajament_Drepturile-omului_RO_20230530.pdf)

<sup>5</sup> [https://www.nuclearelectrica.ro/tr/wp-content/uploads/sites/9/2023/07/SNN\\_Angajament\\_Mediu\\_RO\\_20230531.pdf](https://www.nuclearelectrica.ro/tr/wp-content/uploads/sites/9/2023/07/SNN_Angajament_Mediu_RO_20230531.pdf)

<sup>6</sup> [https://www.nuclearelectrica.ro/tr/wp-content/uploads/sites/9/2023/07/SNN\\_Angajament\\_respectare-ESG\\_RO\\_20230530.pdf](https://www.nuclearelectrica.ro/tr/wp-content/uploads/sites/9/2023/07/SNN_Angajament_respectare-ESG_RO_20230530.pdf)



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Directors and of the Executive Management in overseeing the sustainability matters was already described in this chapter. The ESG Advisory Committee and the ESG Working Group strengthen the level of expertise and knowledge and assists governance bodies in the area of sustainability.

The impacts, risks and opportunities identified and assessed as material have given due regard to assessment of both internal specialists on specific environmental, social or governance matters, and external and internal stakeholders with no decision-making power or with lower expertise or competence. The Board of Directors has reviewed and approved these results, as providing the most comprehensive and transparent picture of all specific and material impacts, risks and opportunities for the SNN Group.



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## SNN Group Governance



### Information supplied to the undertaking's administration, management and supervisory bodies and sustainability matters approached by them | GOV-2



Impact assessment takes place as part of the double materiality assessment (impact materiality) which is reassessed on an annual basis, mainly under the responsibility of the ESG Advisory Committee and the ESG Working Group. The Board of Directors approves the identified impacts, including their qualification and assessment by the stakeholders involved in the process. Further details about impact assessments are available in the Sub-Chapter Methodological Points on Impact Materiality”.

The targets adopted under the SNN Strategy are followed up by the Board of Directors in terms of their degree of

fulfilment and are attained by the Executive Management through effective implementation of the investment projects on the basis of which they were established.

The policies and effectiveness commitments, and the results approved by the Board of Directors are: the ESG Policy; the Human Rights Commitment; the Environmental Protection Commitment; and ESG Principles Commitments.

Risk assessment in the SNN Group is carried out periodically (quarterly), by the risk structure, according to Risk management procedure in S.N. Nuclearelectrica S.A., and results are described in the Risk Management Report, with a focus on the main risks which the SNN Group faces. Thus, the administration, management and supervisory bodies are advised of the sustainability general matters, material impacts, risks and opportunities and how these were addressed during the reporting period. If need be, corrective measures are instructed.

The main categories of risks presented on a quarterly basis in the Risk Management report are:

- Risks related to nuclear safety (Nuclear Safety);
- Information security, nuclear safeguard and physical protection risks (protection of nuclear raw material and radioactive materials);
- Compliance risks, broken down into 3 subcategories:
  - fraud risks,
  - compliance risks (ethics, integrity and conflict of interest)
  - the compliance risks (risks related to observance of the external regulation framework – for

instance, laws, ordinances, rules, internal regulation framework, such as internal policies, processes and procedures)

- Supply chain risks
- ESG risks
- Climate risks (risks related to how the SNN Group could impact environmental change, i.e. risks where the SNN Group could be impacted by climate change).

The opportunities identified and assessed as material by the materiality assessment are approved by the Board of Directors. The Advisory Committee for Strategy, Development and Large Investment Projects clears the investment opportunities that are relevant and attainable for the SNN Group, and issues proposals to turn them to account for the Board.

The Advisory Committees are tasked with performance of analyses and making recommendations for the Board of Directors, in specific fields, and are under obligation to regularly submit activity reports to the members of the Board of Directors.

The key responsibilities of the Advisory Committees are provided in their respective Organisation and Functioning Regulations approved by the Board of Directors, and are available on the SNN website. The ESG Advisory Committee was also established in 2025. ■

The governance bodies make sure that an adequate mechanism is in place to monitor the ESG performance by reviewing the work of the ESG Working Group and of the ESG Advisory Committee operating under the Board of



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Directors, and by revisiting the risk register and the risk (including ESG risk) quarterly reporting.

The impacts, risks and opportunities assessed as material and monitored by the Board of Directors during the reporting period are addressed in the sub-chapter “Material Impacts, Risks and Opportunities, and their Interaction with the Business Strategy and Model”.

## SNN Group Governance

### Integration of sustainability performance into the incentive systems | GOV-3

In the SNN Group, the Remuneration Policy does not include performance metrics related to ESG matters. The financial or non-financial performance indicator set for the BoD members or the executives under their respective contracts of mandate do not include any ESG matters, such as those identified by the materiality assessment or linked with the ESG targets assumed at Group level.

## SNN Group Governance

### Declaration on the Due Diligence Process | GOV-4

The SNN Group has developed and maintains a General Management System, which complies with the provisions of Law no. 111/1996, republished, and the Quality Management Rules applicable in the nuclear field (NMC), issued by the National Commission for Nuclear Activities Control (CNCAN). The SNN Group’s Management System is licensed by CNCAN according to Law no. 111/1996 under the for Nuclear Quality Management System Authorisation for Management Activities - Authorisation no. SNN EX - 01/2021, valid until 30 April 2023; the authorisation currently held, i.e., SNN EX-01/2025, is valid until 30 April 2027. The SNN Group’s Management System Requirements apply to all activities and processes undertaken across the Company.

The Management System developed and implemented in the SNN Group addresses, in a coherent, coordinated and unitary fashion, the components related to nuclear safety,

quality, protection against ionising radiation, environmental protection, occupational health and safety, physical protection, protection against cyber threats, nuclear safeguard control, protection of classified information, planning and response to emergencies, sale of the electricity generated, and matters related to the economic performance, and ensures that their requirements are not addressed separately from nuclear safety, as this takes priority over any other requirements, considerations and interests.

The implementation of the management system ensures identification and integration of all legal and regulatory requirements, good practices and voluntarily adopted standards, such as ISO 37001, ISO 27001, in order to attain the general objectives of the Company and meet the expectations of all stakeholders.

The management of the SNN Group has delegated to the Branches the responsibility for development and implementation of parts of the Management System of SNN, for the specific activities they carry out, without this leading to reduction of its responsibility for the effectiveness of the system as a whole. Consequently, the Branches have developed their own Management Systems aligned to the requirements of the SNN Group Management System, as well as to the legal requirements applicable to their specific field of business. The Management Systems of the Branches are reviewed and accepted by the SNN executive management.

The integrated management system applied by **Cernavoda NPP** focuses on meeting the nuclear safety



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requirements that stem from the CNCAN rules and requirements, which underlay the issue of the operating permit for Units 1 and 2 of Cernavoda and for the Spent Fuel Storage (DICA), and is developed in accordance with the requirements of the IAEA GSR Part 2 standard and the CNCAN Rules for Quality Management Systems, voluntarily integrating the requirements of the management standards ISO 14001, ISO 45001, ISO 17025, ISO 27001, ISO 37001, and the requirements of the EMAS Regulation – Eco Management and Audit Scheme. The management system of Cernavoda NPP is authorised according to the requirements of Law no. 111/1996, republished, on Operation, design, supply, repair and maintenance, use and maintenance of nuclear software products activities (CNCAN permit no. SNN Cernavoda NPP – 01/2025, valid until 30 April 2027).

The integrated management system applied by Pitesti NFP focuses on meeting the requirements that stem from the CNCAN rules and requirements that underpin the issue the operating permits issued for the nuclear fuel production activity, and is developed in accordance with the requirements of the Canadian standard CSA N299.2 – 19 and the CNCAN Rules for Quality Management Systems, voluntarily integrating the requirements of the management standards ISO 9001:2015, ISO 14001:2015,

ISO 45001:2023, ISO 17025:2017, ISO 37001 and the requirements of the EMAS Regulation. The management system of Pitesti NFP is authorised according to the requirements of Law no. 111/1996, republished, on Manufacturing activities in the nuclear field, class 2 of gradual application, granted to the management system (CNCAN permit no. 22 – 039, valid until 17 September 2026).

The branches Cernavoda NPP and Pitesti NFP hold certificates for compliance of the Management System with the requirements of the standards ISO 14001 Environmental Management Systems and ISO 45001 Occupational Health and Safety Management Systems. Pitesti NFP also holds a certificate of conformity for the Management System, in accordance with the standard ISO 9001:2015, as of September 2023.

Both branches are enrolled in the Eco – Management and Audit Scheme (EMAS), according to the Regulation (EC) no. 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco – management and audit scheme (EMAS) and the Regulation (EU) 2017/1505 of the Commission of 28 August 2017 amending Appendices I, II and III.

It should be noted that the provisions of the CNCAN Rules that contain requirements for the quality management systems cover the requirements of the standard ISO 9001:2015 and even exceed them, being intended for organisations acting in the nuclear field. However, for a better recognition of the performance of the management system implemented in the SNN Group, the Headquarters is certified in accordance with the requirements of the International Standards ISO 9001:2015 and ISO 45001:2018 – Occupational Health and Safety Management System.

The SNN Group has developed structures, process data – sheets, procedures and a risk management that proactively and reactively address the key activities of the Company. This approach helps identify, prevent and mitigate, and assess the impact assessment across all business areas, including ESG, devise and put in place improvement measures, follow – up on response and developments, and communicate on how to impact, risk and opportunities are to be addressed under the materiality matrix.

The SNN Group alignment with the UN Guiding Principles is presented in Annex 1 – Results of the Minimum Social Safeguards Attainment Verification.



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KEY DUE DILIGENCE PROCESS ELEMENTS	POINTS FROM THE CONSOLIDATED SUSTAINABILITY REPORT	IS THE DISCLOSURE ABOUT PEOPLE OR THE ENVIRONMENT?
Include the due diligence into the governance, strategy and business model	ESRS 2; E1; E2; E3; E4; E5; S1; S2; S3; G1	People and environment
Work together with all affected stakeholders in all key stages of the due diligence process	ESRS 2; E1; E2; E3; E4; E5; S1; S2; S3; G1	People and environment
Identify and assess the negative impacts	ESRS 2; E1; E2; E3; E4; E5; S1 – 9; S1 – 14; S1 – 17; S2; G1 – 3; G1 – 4; Additional topic;	People and environment
Take measures to address these negative impacts	ESRS 2; E1; E2; E3; E4; E5; S1 – 14; S2; G1 – 3; G1 – 4; Additional topic;	People and environment
Monitor the effectiveness of these efforts and communication	ESRS 2; E1; E2; E3; E4; E5; S1 – 14; S2; G1 – 3; G1 – 4; Additional topic;	People and environment

## SNN Group Governance

### Risk management and internal controls related to sustainability reporting | GOV-5



In the SNN Group, the main categories of risks are presented on a quarterly basis in the Risk Management Report.

The risks listed under the Chapter “Impact, Risk and Opportunities Management, and which are repeated also under each material topic and sub-topic are the result of the double materiality assessment”, according to the ESRS. The SNN Group keeps a previously – developed risk register, where the risks were included, merged and linked to an impact, according to the ESRS. Risk assessment at SNN Group is performed on a quarterly basis in accordance with the Risk Management procedure and is detailed in the Risk Management Report, focusing on the Company's major risks. The management and supervisory bodies are informed about sustainability issues, significant impacts, risks and opportunities, as well as measures taken. The main categories of risks reported are the following: nuclear safety risks, information security and nuclear material protection risks, compliance risks (fraud, integrity, regulatory), supply chain risks, ESG risks and climate risks. If necessary, corrective action is taken.

No risks related to sustainability reporting are currently entered into the risk register applicable to all SNN Group's entities.



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# SNN Group Strategy



Strategy, business model and value chain | **SBM-1**



Societatea Nationala Nuclearelectrica S.A. is a national joint stock company, managed under single – tier system, with a Headquarters and two branches without legal personality and three subsidiaries. RoPower Nuclear SA is not included in the consolidation, as SNN SA only holds shares in this company. The main scope of business of the Company is “Electricity generation” – CAEN Code 3511 and is registered with the Trade Register under number J40/7403/1998, Unique Registration Code 10874881, tax attribute RO.

Type of shareholder	Number of shares held	% of share capital holding
Romanian State – Ministry of Energy	248,850,476	82.4981%
Other shareholders	52,793,418	17.5019%
Legal Entities	40,872,803	13.5501%
Natural persons	11,920,615	3.9519%
<b>Total</b>	<b>301,643,894</b>	<b>100%</b>

Electricity is sold under the electricity generation license, as follows:

- On the competitive market, under contracts for the sale and purchase of electricity:
  - on markets managed by the market operator OPCOM SA, with long – term delivery: CM – OTC, CMBC – EA – flex, and CMBC – CN; with short – term delivery: DAM (Day – Ahead Market) and IDM (Intraday Market);

- through bilateral transactions with parties negotiation;
- under a bilateral contract concluded with the supplier designated by the Government of the Republic of Moldova in order to ensure electricity supply safety for the neighbouring country, considering the exceptional situation caused by the effects of the war in Ukraine.
- On the balancing market managed by Transelectrica SA, in case of positive imbalances.
- Under energy supply contracts concluded with two consumers supplied directly from the facilities of Cernavoda NPP, based on the electricity production license.

An Administration Plan for the 2023 – 2027 period was prepared in accordance with the provisions of Article 30(1) and Article 36(1) of the Government Emergency Ordinance no. 109/2011 on the corporate governance of public undertakings, as subsequently amended and supplemented, by the members of the Board of Directors and the Executives of the SNN Group, as appointed further to completion of the selection procedures provided for in aforementioned regulatory act under the Resolution no. 6/10.08.2022 and the Resolution no. 1/15.02.2023 of the Ordinary General Meeting of SNN Group Shareholders. The SNN Group is the only electric power producer based on nuclear technology from Romania, by Cernavoda NPP branch.

With its Pitesti NFP Branch, the SNN Group also produces CANDU 6 – type nuclear fuel bundles that are used to keep its own nuclear reactors in use. Decay heat is used to produced heat in centralised system.



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Total number of employees by geographical area/branches and subsidiaries	HQ – 242
	Pitesti NFP – 374
	Cernavoda NPP – 1,882
	FPCU Feldioara - 286
	ErgoNuclear – 68
	Nuclearelectrica Serv - 718
	<b>Group-wide total employees: 3,570</b>
Total income	RON 5,653,142,332
Income by key ESRS Sectors <sup>7</sup>	Electricity: RON 5,593,957,066 Heat RON 6,744,889
Income from fossil fuels (coal, oil and gas)	Not applicable
Income from coal	Not applicable
Income from oil	Not applicable
Income from natural gas	Not applicable
Income obtained from business activities aligned to the fossil gas-related taxonomy	Not applicable
Income from chemicals	Not applicable
Income from controversial arms	Not applicable
Income from tobacco growing and production	Not applicable

Due to the need to speed up the response to climate change, nuclear energy has become an essential solution for decarbonation and a basic source of energy security, energy independence, social and economic development, innovation and talent fostering, which all also addresses the ESG challenges. The SNN Group, as a company, develops at national level and gets actively involved at international level with a view to supporting the energy transition, and develops and deploys cutting – edge technical solutions able to help attainment of the environmental targets.

Given the critical role of nuclear energy both in the transition towards a clean economy, and in attaining the decarbonation targets assumed by Romania, for the SNN Group, the outlooks of 2050 lay ahead the following priorities, which are also the pillars of current operation, development and contribution to a clean and sustainable economy:

- Safe, environmentally – friendly and employee and population protection – centered operation of Units 1 and 2, the Nuclear Fuel Plant Branch and Feldioara subsidiary;
- Maintaining and developing the management system, including the environmental management system, to cope with the future challenges raised by the major investment projects;
- Protection of the environment, staff and population;
- Development of SNN Group's investment projects in the defined timeline;
- Expanding the nuclear production facilities that do not generate CO2 emissions, which will contribute to

<sup>7</sup> generates more than 10% of the Company's income and/or is related to the actual material impacts or the potential material negative impacts of the Company.

- reaching Romania's environment targets;
- Development of corporate governance as a coagulation and efficient integration process for all processes in the SNN Group;
- Care for employees, collaborators and the population, by responsibly managing all operating and development activities;
- SNN Group stakeholders involvement in development of the Company and communicating of the relevant aspects of governance, ethics and integrity to them;
- Development of a new generation of nuclear energy specialists to continue operation and development of nuclear projects and, implicitly development of multiple staff attraction, retention and training programmes;

Ensuring supply security for the Romanian energy system, source availability in SEN, and backup provision for renewable sources, by and beyond 2050. SNN Group's medium and long – term investment projects amount to approximately EUR 12 billion.

Their impact is quantifiable both in terms of both the increased supply security for Romania and the region, considering the unified European market which is estimated to reach a 15% interconnectivity by 2030, as well as development of the related industries, the infrastructure, the research and development, the education, and attainment of the decarbonisation targets assumed by Romania.



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### Targets assumed by Romania:

- to reduce the CO<sub>2</sub> emissions by 55% by 2030, compared to the baseline year 2005;
- to reduce its dependence on energy imports from 20.8% currently, down to 17.8% by 2030, which means sustained investments in generation capacities free of carbon emissions or transition capacities, with base load delivery to ensure stability for the national power system;
- to reduce the coal-based power generation down to 4.59 GWe by 2032, which means to replace these sources by other clear energy sources.



Reduce the CO<sub>2</sub> emissions by 55% by 2030



Reduce its dependence on energy imports from 20.8% currently, down to 17.8% by 2030



Reduce the coal-based power generation down to 4.59 GWe by 2032

### The two nuclear units that the SNN Group operates contribute to Romania's energy security, but also to attainment of decarbonisation targets by:

- 1,400 MW installed
- 18 – 20% of the consumption demand
- 33% of the total clean energy in Romania

- 235 million tonnes of CO<sub>2</sub> avoided since commissioning and to date (10 million tonnes of CO<sub>2</sub> avoided annually by operation of the two units of Cernavoda)
- 11,000 job in the industry.



1,400 MW installed



18 – 20% of the consumption demand



33% of the total clean energy in Romania



235 million tonnes of CO<sub>2</sub> avoided since commissioning and to date (10 million tonnes of CO<sub>2</sub> avoided annually by operation of the two units of Cernavoda)



11,000 job in the industry

### Expansion of the nuclear capacity with two new CANDU 6 units in Romania, the SNN Group contributes with:

- 66 % clean energy contribution
- 20 million tonnes of CO<sub>2</sub> avoided annually
- over 19,000 jobs.



66 % clean energy contribution



20 million tonnes of CO<sub>2</sub> avoided annually



over 19,000 jobs

### Adding also small modular reactors – SMR implementation:

- 462 MW installed
- 4 million tonnes of CO<sub>2</sub> avoided annually
- replacement of coal – fired power plants
- 2,100 jobs.



462 MW installed



4 million tonnes of CO<sub>2</sub> avoided annually



replacement of coal – fired power plants



2,100 jobs



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The achievements above, including the impacts estimated for new developments present clear benefits for customers, investors and other stakeholders by improving energy security, supporting decarbonization and economic and social development.

We protect the interests of the investors and the society through a careful selection of our suppliers and partners. The SNN Group purchases products, services and works under the provisions of Law no. 99/2016 on sectoral procurements. SNN Group suppliers who supply products, services or works classified as important for nuclear safety and intended for Cernavoda NPP and Pitesti NFP, must obtain the status of **“qualified supplier”**, prior to the conclusion of the contract. The Company is authorised by the National Commission for Nuclear Activities Control (CNCAN) and, according to the law, it is required to see that its suppliers of products, services or works, as well as their sub – suppliers along the chain put in place and maintain their own controlled quality management system.

The three major investment projects of the SNN Group are complementary: refurbishment of Unit 1, the Project of CANDU 6 Units 3 and 4, and small modular reactors – SMR US. The first two provide clean energy, base load, implicitly security in the provision and availability of the energetic system, and the small modular reactors provide flexibility, the opportunity to protect economically and socially the areas with coal – fired power stations decommissioned, local development, workplaces. An essential balance will be struck between the power reactors and small modular reactors – SMR in terms of production and response to decarbonisation and the energy system or local needs.

The SNN Group operates in a strategic sector, making a significant contribution to energy security and the transition to a sustainable future through production of clean and efficient nuclear energy. The Group's business model is centered on operation, expansion and development of nuclear facilities, with a focus on the following directions:

- Ensure nation-wide energy security: The Group supplies an adequate amount of energy needed to sustain Romania's domestic consumption.
- Decarbonize production: The nuclear energy supplied by the Group helps avoid the CO2 emissions, and supports the local and international greenhouse gas reduction targets.
- Increase employment: The Group supports local industry development and creates jobs for thousands of people nationwide.

The SNN Group's value chain relies an integrated approach covering the collection, development and contribution support stages.

The Group operates two nuclear units at Cernavoda, with a total capacity of 1400 installed MWs. These units cover 18 to 20% of Romania's consumption, and produce 33% of the total clean energy of the country. The units at Cernavoda have so far avoided about 215 million tons of CO2, i.e., approx. 10 million tons per year.

To develop nuclear capabilities and expand its energy contribution, while also creating a positive environmental impact, SNN Group has pipelined construction of two new CANDU 6 units and deployment of Small Modular Reactors (SMRs).

The SNN Group aims to secure and sustain its impact on the economy and the environment by continuously innovating and using advanced nuclear technologies, strengthening industrial cooperation and promoting jobs in the field of nuclear energy, and contributing to the phasing-out of the coal-fired power plants, thus contributing to the sustainable energy transition process. The SNN Group's achievements are designed to improve energy security, to support decarbonization and to foster economic and social development, while addressing the strategic priorities for customers, investors and communities. By expanding Romania's nuclear capabilities, the SNN Group will be able to offer:

- A 66% contribution to clean energy at the national level, supporting the energy transition objectives;
- An annual reduction of the CO2 emissions by 20 million tons, thus contributing to the decarbonization of the economy;
- More than 19,000 new jobs, supporting the national economic and social development.

Small modular reactors are an innovative solution that helps:

- Add 462 MW of installed capacity to the national energy capacity;
- Reduce the CO<sub>2</sub> annual emissions by 4 million tons, supporting the environmental targets and reducing pollution;
- Create 2,100 additional jobs, boosting the economic impact and increasing the employment opportunities.



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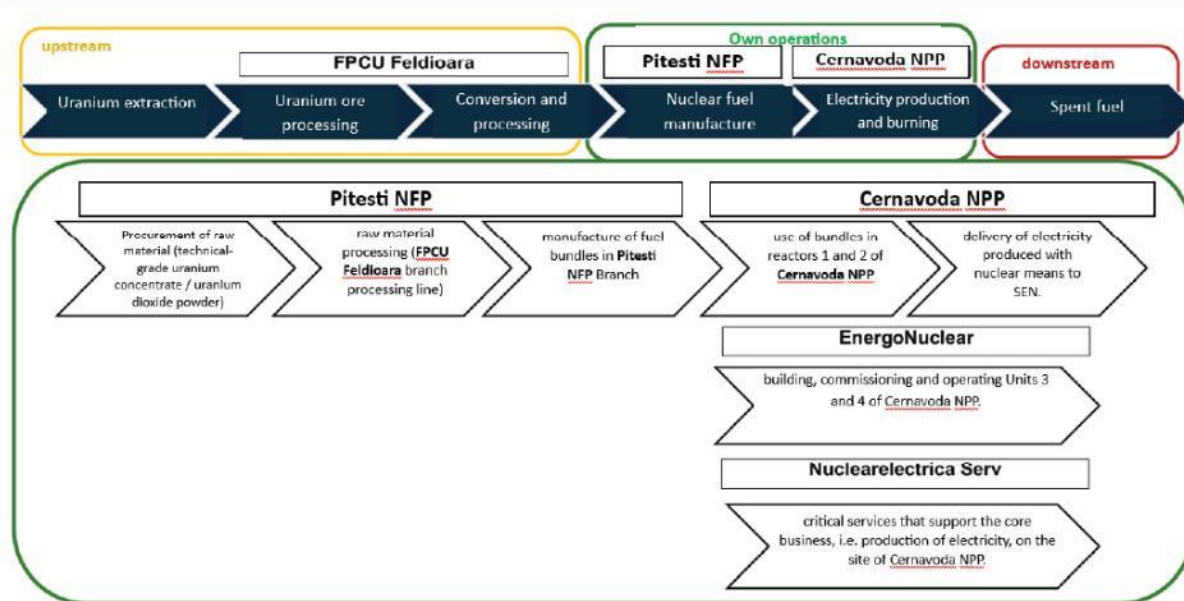
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The SNN Group pays adequate attention also to its collaboration with suppliers and partners, applying quality and responsibility standards across its entire business activity. Thus, protection of the interests of investors and of the Company is supported by a careful selection of suppliers and partners, who are bound to abide by the quality standards and the related legal regulations. The SNN Group conducts its procurement in accordance with Law no. 99/2016 on sectoral procurement, ensuring transparency and process compliance.

Suppliers who supply products, services or works classified as nuclear safety-related are required to obtain the status of "qualified supplier" before entering into any contracts.

The SNN Group licensed by the National Commission for Nuclear Activities Control (CNCAN) and, according to the law, confirms that its suppliers implement and maintain a controlled quality management system.

The direct and indirect benefits generated by the SNN Group are tangible for customers, investors and other stakeholders, maximizing the reliability and availability of clean energy for consumers, thereby also reducing any environmental impact. Furthermore, profitability driven by sustainable and high-performing projects may increase, and thus render the nuclear sector more attractive for investors. Last but not least, there may also be significant contributions to the development of local communities and the national economy, through job creation or by supporting local industries.



Societatea Nationala Nuclearelectrica S.A. has a well – structured value chain, which includes essential stages both upstream and downstream, thus ensuring an efficient and sustainable operation of its nuclear activities.

**Upstream:**

- Uranium mining – This is the first stage of the value chain, where uranium ore is extracted from mines. The main commercial actor at this stage is the raw material suppliers. Details about the Company's main suppliers can be found in the chapter *Supplier relationship management (G1 – 2)*.
- Uranium ore processing – The extracted uranium is processed into a uranium concentrate, a crucial step for further processing, carried out by the FPCU Feldioara.

- Conversion and processing – The uranium concentrate is processed to provide an adequate content of the U – 235 isotope needed to make nuclear fuel. This stage is also carried out by FPCU Feldioara subsidiary.

**Own operations:**

- Nuclear fuel fabrication – SN Nuclearelectrica S.A. produces its own nuclear fuel bundles, using processed uranium, at Pitesti NFP.
- Power generation and combustion – The company operates the two units at Cernavoda, generating electricity through nuclear processes. This places SN Nuclearelectrica S.A. as the main producer of nuclear energy in Romania and an important player in the European energy sector.



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### Downstream:

- Spent fuel – After the nuclear fuel is burned in reactors, spent fuel is safely stored and then managed to minimise environmental impact. Details on waste management can be found in the chapter *Resource outputs (E5 – 5)*.
- Customers: Supply, distribution of electricity.

SN Nuclearelectrica S.A. has a central position in the nuclear value chain, managing the critical stages from nuclear fuel fabrication to electricity generation. Having this position, the Company plays an essential role in ensuring Romania's energy security and contributes significantly to the country's decarbonisation objectives. Partnering with specialised players at every stage of the value chain, from uranium mining to spent fuel management, ensures the continuity and sustainability of its nuclear operations. The described value chain comprises the critical components of the SNN Group.

The Group's management view its operations in their entirety as a "single operating segment", in accordance with the provisions of IFRS 8. No changes in products or services, markets and/or customer groups occurred during the reporting period.

Identification of a single reportable segment relies on the following elements:

- The Group generates and delivers only electricity and heat. The share of income delivery of heat is down at only 0.11%.
- The generation activity takes place only in the territory of Romania.
- The two functional nuclear units and the nuclear fuel

plant are located in the territory of Romania.

- The electricity delivery is mainly done in the territory of Romania and exclusively to legal entities.

The regulatory framework is consistent for the entire Group, applying accounting regulations compliant with the International Financial Reporting Standards ("IFRS") as approved under OMFP no. 2.844/2016, and Romanian energy sector is regulated by the Romanian Energy Regulatory Authority ("ANRE").

In order to meet the financial statements presentation requirements, we point out the following:

- IFRS 8.32 – *Information about products and services:* As the reporting entity, the Group's core business activity consists of production of electricity and heat through nuclear processes.
- IFRS 8.33. – *Information about geographic segmentation:*
  - *Amount of income obtained from sale of electricity in the territory of Romania and abroad.* 100% of the income from the sale of electricity in 2025 were made to customers established in Romania.
  - *Amount of non-current assets located in Romania and abroad.* All non-current assets of the Group are located in the territory of Romania.
- IFRS 8.34. – *Information about main customers.*

There were no impacts, risks or opportunities assessed and addressed in this Report, other than those identified in the materiality assessment. The SNN Group is not active in sectors other than electricity generation and has no significant relationship with other sectors through its business model or value chain.



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## SNN Group Strategy



### Stakeholder interests and views | SBM-2



STAKEHOLDER CATEGORIES	EXAMPLES OF STAKEHOLDERS	COLLABORATION WITH STAKEHOLDERS
Shareholders	<ul style="list-style-type: none"> <li>The Romanian State, through the Ministry of Energy</li> <li>Other shareholders</li> </ul>	<ul style="list-style-type: none"> <li>Attaining a high level of nuclear safety performance;</li> <li>Increasing the turnover and profit</li> <li>Observance of the resolutions of the General Meeting of Shareholders</li> <li>Long – term business viability</li> </ul>
Investors and financial institutions	<ul style="list-style-type: none"> <li>Other investors, banks</li> </ul>	Honesty and transparency to support a decision to invest in the Company's financial instruments
Central and local authorities	<ul style="list-style-type: none"> <li>Government, parliament, ministries</li> <li>Municipalities, local councils, county councils</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with legal requirements (compliance obligations from authorisations, protocols, notices, etc. or specific requirements of the authorities)</li> <li>Operation of the nuclear power plant within the limits and under the conditions imposed by the authorisations or signed protocols</li> </ul>
Regulatory and control authorities	<ul style="list-style-type: none"> <li>In the nuclear field: CNCAN</li> <li>Environmental protection – Environmental Guard, Environmental Protection Agency/Authority (APM)</li> <li>Water management – “Apele Romane” National Authority (ANAR) (at central level) and Danube – Seashore Water Basin Administration (ABADL) (at local level)</li> <li>Labour Inspection, through the Territorial Labour Inspectorate</li> <li>Public Health Directorate</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with the legal requirements, and the international, national and local laws and regulations;</li> <li>Attainment of a high level of nuclear safety;</li> <li>Communication for visibility and credibility;</li> <li>Compliance with the contractual commitments and concluded agreements</li> <li>Compliance with the measures set out in the Emergency Plan</li> </ul>



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STAKEHOLDER CATEGORIES	EXAMPLES OF STAKEHOLDERS	COLLABORATION WITH STAKEHOLDERS
<b>Business partners</b>	<ul style="list-style-type: none"> <li>Electricity customers</li> <li>Electricity carriers</li> </ul>	Production of electricity and heat in compliance with all legal requirements applicable to environmental protection and voluntarily implements, in its own work system, the latest environmental and OHS standards
<b>Employees</b>	<ul style="list-style-type: none"> <li>Own employees</li> <li>Employees in the value chain</li> </ul>	<p>Recognising and rewarding work in accordance with required performance.</p> <p>Ensuring a safe and healthy working environment</p> <p>Compliance with all agreements signed with contractors of services or products concerning environmental protection (e.g. environmental agreements).</p> <p>Compliance with the organisational requirements according to the CBA and the Internal Regulation</p> <p>Professional development opportunities</p> <p>Workplace safety</p> <p>Participation and consultation</p> <p>Adequate working conditions, and a competitive work environment, in observance of the occupational health and safety requirements;</p>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>Suppliers of goods and services (e.g. raw materials, utilities, equipment, etc.)</li> </ul>	<p>Mutually beneficial, profitable and safe business relationships</p> <p>Compliance with the contractual commitments (order stability, delivery planning)</p>



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STAKEHOLDER CATEGORIES	EXAMPLES OF STAKEHOLDERS	COLLABORATION WITH STAKEHOLDERS
<b>National and international NGOs</b>	Non-Governmental Organisations	<p>Communication for visibility and credibility</p> <p>Activity improvement</p> <p>Voluntary practice principles</p> <p>Compliance with the nuclear safety, environment, OHS and Emergency commitments</p>
<b>External organisations (WANO, INPO)</b>	<p>WANO – World Association of Nuclear Operators</p> <p>INPO – Institute of Nuclear Power Operations</p>	<p>Carrying out activities with care for the environment and the population</p> <p>Providing relevant information on the activity and environmental performance</p> <p>Compliance with all legal requirements in the field of environmental protection.</p> <p>Consultation about future projects, and in the permitting process, in accordance with the rights acquired under the Aarhus Convention and the legislative framework regulated at national level.</p> <p>Answering to requests for information and concerns made known via the communication channels with the Group through the information centers, public relations departments, and the local advisory committee organised locally.</p>
<b>Media</b>	Publications	Open, immediate and accurate communication.



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STAKEHOLDER CATEGORIES	EXAMPLES OF STAKEHOLDERS	COLLABORATION WITH STAKEHOLDERS
Local communities and general public	Local communities	Safe operation of the plants to protect the population and the environment
	Population at large	Responsible involvement in the community Voluntary environmental commitments Compliance with agreements concluded with the community groups Communication for visibility and credibility
Education units	Vocational education Universities	Student traineeships, internships or dual learning programmes

Societatea Nationala Nuclearelectrica S.A. organises interactions with stakeholders through open and transparent communication, according to the highest regulatory and control standards. This pays special attention to of communication with, and transparency towards, all stakeholders: staff, population, local and national authorities, NGOs and media, seeking to depict and maintain a realistic image based on facts and concrete data able to strengthen the positive characteristic of nuclear energy, as well as its major social and economic impact.

The nuclear energy is regulated and controlled and always under careful watch of the control authorities, national and international governmental organisations, non-governmental organisations, media and public. The Group abides by, and puts in place, the highest environment, staff and population protection standards.

In terms of social matters, the SNN Group continues to focus on increasing its positive impact for the benefit of communities, by creating a responsible value and increasing nuclear safety. The SNN Group pays particular attention to the systematic training of its staff, to the highest standards of professional competence, implementing continuous training, succession and mentoring programmes for its employees. The SNN Group also kicks off traineeship, internship and dual education programmes to train new specialists and grow a new generation of specialists in the nuclear energy.

The stakeholder, and applicable legal and regulatory, requirements are integrated into the integrated management system processes, activities and documentation, and the set of verification, monitoring and control activities aims not only to meet these requirements, but also to

increase stakeholder satisfaction.

The business strategy takes into account adding ESG aspects to the Group's processes and activities: development and monitoring of indicators, implementation of development measures, effective reporting, modifications of indicators and related data in case of significant changes in the short and medium term in the business development strategy. The ESG strategy and policies related to the ESRS, drafted approved in 2025, are designed to adapt to the requirements and views of stakeholders involved in the process. The development of ESG in the SNN Group does not imply major changes in stakeholder perspectives, but potentially an appreciation of the interest in ESG on the part of the capital market.

No changes were made to the strategy and/or business model in 2025

The 2025-2030 Investment Strategy towards 2030, which is published *on the SNN website* was approved by the *General Meeting of Shareholders of 3 September 2025*. ■

The details of the last materiality assessment process carried out for this report have been presented to the Board of Directors, taking into account the identified sustainability impacts, risks and opportunities, and subsequently approved by the Board of Directors. The latest materiality analysis process asked the non-decision making stakeholders an open-ended question (as described in the sub-chapter "Description of the Material Impact, Risk and Opportunity Identification and Assessment Processes") which was aimed at identifying new



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impacts that had not already been addressed in the current analysis, and that could be a material issue for the stakeholders responding to the questionnaire. Results will be interpreted and factored in the future reporting insofar as impacts or topics that the SNN Group does not address are identified.



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## SNN Group Strategy



**Material impacts, risks and opportunities and their interaction with strategy and business model**  
| *SBM-3*



The environmental, social and governance impacts, risks and opportunities were identified and assessed as part of the dual materiality process, in an internal workshop and in consultations with other relevant sources, such as the permits needed for duly operation of the sites, international impact identification tools such as Encore, UN Impact Radar, OECD Tools or Work Institute were considered, and best practices on material topics were followed, along with impacts, risks and opportunities addressed in the nuclear energy industry. Taking into account these aspects, as well as the Company's business model or strategic directions, the impacts, risks and opportunities have been identified.

In the analysis conducted for FY 2025, significant impacts were identified for all thematic ESRS standards (ESRS E1-E5, S1-S4 and G1), covering all general material topics as described in ESRS 1 AR.16. In addition, two impacts related to a SNN Group's nuclear safety-related additional topic were identified and rated as significant. Some topics have been declared as not applicable at sub-topic or sub-sub-topic level, as shown in the table below. All material impacts and related information are presented at the beginning of each ESRS topic in this report.



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Topical ESRS	Topic	Sub-topic	Sub-sub-topic	Non-applicable reason
ESRS E2	Pollution	Microplastics	n/a	SNN Group's activities do not involve production, use or management of such materials, as these are not relevant or related to the operational processes of the nuclear industry.
ESRS E3	Water and marine resources	Marine resources	Water discharges in oceans	The SNN Group does not carry out any activities involving discharges of wastewater or other materials into the ocean environment.
			Extraction and use of marine resources	SNN Group's activity does not involve exploitation or utilization of any marine resources
ESRS E4	Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Climate change	The topic is addressed and all information is presented under ESRS E1.
			Land-use change, fresh water-use change and sea-use change	The Group's activities do not change the use of land (e.g., through logging), freshwaters or seas.
			Direct exploitation	The SNN Group does not pursue any direct operating activities. Raw material use is addressed separately in ESRS E5 - Resources inflows
			Invasive alien species	The SNN Group's activity does not give rise to occurrence of invasive alien species. However, although potential risks that the SNN Group could have on invasive alien species were identified, these were assessed as immaterial.
		Impacts on the state of species	Special population size	The SNN Group's activities do not directly influence the plant or animal population numbers.
			Species global extinction risk	The SNN Group does not have a direct impact on any plant or animal species, including those threatened by extinction at global level.
		Impacts on the extent and condition of ecosystems	Land degradation	The topic is addressed and all information is presented under ESRS E2 - Pollution of soil.
			Desertification	The Group's activities do not directly contribute to, or cause, desertification.
		Impacts and dependencies on ecosystem services	n/a	The Group's activities do not have a direct impact, or depend, on ecosystem services (e.g., tourist areas, cultural areas, etc.)



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Topical ESRS	Topic	Sub-topic	Sub-sub-topic	Non-applicable reason
ESRS E5	Circular economy	Resource outflows related to products and services	n/a	As a nuclear electricity generating company, no product or service-related resources outflows have been identified.
ESRS S1	Own employees	Other work-related rights	Child labour	The SNN Group's employees must be over the age of 18 years. No cases of child labour have been identified in the SNN Group's operations.
			Forced labour	No cases of forced labour have been identified in the SNN Group's operations.
ESRS S2	Workers in the value chain	Working conditions	Secure employment	The SNN Group does not have a direct impact or influence on social security or the types of contracts offered to the workers in the value chain.
			Working time	The SNN Group does not have a direct impact on the working hours of the workers in the value chain.
			Adequate wages	The SNN Group does not directly influence the wages of the workers in the value chain
			Social dialogue	The SNN Group has no direct influence on the social dialog between the workers in the value chain and its business partners.
			Freedom of association, including the existence of work councils	The SNN Group has no direct influence on the freedom of association or the existence of works councils in the value chain
			Collective bargaining	The SNN Group has no direct impact on collective bargaining in the value chain
			Work-life balance	The SNN Group does not influence the work-life balance of workers in the value chain



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Topical ESRS	Topic	Sub-topic	Sub-sub-topic	Non-applicable reason
ESRS S2	Workers in the value chain	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	The SNN Group does not exert any direct impact or influence on business partners in terms gender equality or fair pay in the value chain
			Training and skills development	The SNN Group does not have a direct influence on the training or skill development of workers in the value chain
			Employment and inclusion of persons with disabilities	The SNN Group does not intervene or influence the employment or inclusion of persons with disabilities for its business partners in the value chain
			Measures against violence and harassment in the workplace	The SNN Group has no direct influence on application of any measures against violence and harassment in the value chain
			Diversity	The SNN Group does not influence the diversity of the workers in the value chain through business relationships, contract agreements or criteria applied to partners.
		Other work-related rights	Child labour	The SNN Group does not have a direct influence on the child labour cases and no such cases have been identified in the value chain.
			Forced labour	The SNN Group does not have a direct influence on the forced labour cases and no such cases have been identified in the value chain.
			Adequate housing	The SNN Group exerts no direct impact or influence on provision of adequate housing for the workers in the value chain.
			Water and sanitation	The SNN Group exerts no direct impact or influence on provision of water and/or sanitation for the workers in the value chain.
			Privacy	This topic is addressed and all information is presented under S1 – Privacy.



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Topical ESRS	Topic	Sub-topic	Sub-sub-topic	Non-applicable reason
ESRS S3	Affected communities	Communities' economic, social and cultural rights	Adequate housing	The SNN Group exerts no direct impact or influence on provision of adequate housing for the local communities.
			Adequate food	The SNN Group exerts no direct impact or influence on provision of adequate food for the local communities.
			Water and sanitation	The SNN Group exerts no direct impact or influence on provision of water and/or sanitation for the local communities.
			Land-related impacts	Topic addressed under E2 – Pollution of soil.
			Security-related impacts	Topic addressed under Nuclear Safety – additional topic.
		Communities' civil and political rights	Freedom of expression	Topic addressed under E4 – Freedom of expression.
		Rights of indigenous peoples	Free, prior and informed consent	There is no indigenous population in Romania, the country where the SNN Group operates.
			Self-determination	
			Cultural rights	



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Topical ESRS	Topic	Sub-topic	Sub-sub-topic	Non-applicable reason
ESRS S4	Consumers and end-users	Information-related impacts for consumers and/or end-users	Privacy	The SNN Group does not process any personal data of its individual customers or end-users.
		Personal safety of consumers and/or end-users	Health and safety	The SNN Group exerts no direct impact or influence on the health and safety of its individual customers or end users.
			Security of a person	The SNN Group does not have a direct impact or influence on an individual's security.
			Protection of children	The SNN Group exerts no direct impact or influence on child protection.
		Social inclusion of consumers and/or end-users	Non-discrimination	The SNN Group does not impact or influence measures or incidents of discrimination against individual customers or end users.
			Responsible marketing practices	The SNN Group does not have any impact, and does not exert any influence, through marketing practices. Marketing takes place via energy trading mechanism regulated by ANRE, which makes this matter inapplicable.
ESRS G1	Professional conduct	Animal welfare	n/a	SNN Group does not perform any experiments on animals. Also, SNN Group's activity does not involve breeding and exploitation of animals.
		Political engagements	n/a	The SNN Group's existing policies provide for commitments not to get involved in political party financing or lobbying activities, and there is transparency in terms of reporting conflicts of interest, which makes this matter not applicable.

All material impacts and related information are presented at the beginning of each ESRS topic in this report.

The double materiality assessment has not quantified in detail the envisaged financial effects in monetary terms. Instead, the company's risk capacity is calculated quarterly on the basis of all risks entered in the risk register (save for the insured risks). The financial effect that the SNN

Group may experience (for risks) or benefit from (for opportunities) has been estimated in the double materiality assessment using a score from 1 to 5 in relation to turnover<sup>8</sup> (1 being a minimal financial effect – less than 0.2% of turnover, and 5 being very high financial effect – more than 5% of turnover).

In this reporting exercise, all impacts, risks and opportunities addressed under the last two sustainability reports have been reassessed and rephrased, where necessary, to meet the ESRS requirements and definitions as clearly and concisely as possible. Also, unlike the last reporting exercises, impacts, risks and/or opportunities were identified at sub-topic and sub-sub-topic level (on topics where this was applicable) and assessed as applicable or non-applicable. The applicable ones were then assessed to determine their materiality for the SNN Group.

<sup>8</sup>The assessment of the impacts, risks and opportunities relied on the latest available estimated turnover figure, i.e., for the previous year 2024.



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## SNN Group Impact, risk and opportunities management

### Disclosures on the materiality assessment process

### Description of the processes pursued to identify and assess the material impacts, risks and opportunities | IRO-1

### Identification of the impacts, risks and opportunities

Impacts have been re-examined prior to submission for re-assessment and some new impacts have been identified to ensure a clearer and more complete approach to the material topics. Impacts have been identified using tools relevant to the nuclear industry, such as Encore, by consulting specialised literature on impact identification (UN Impact Radar, OECD, etc.), tracking the ESRS guidelines, looking into the value chain and the main assets of the Group and of each entity and the business relations, or by benchmarking the international competitors in the industry.

The risks and opportunities identified were intended to assess the financial impact they may have in relation to the identified impacts and material topics relevant to the company. In this process, decision-making stakeholders have been identified, who have initially assessed the impacts. The assessment of risks and opportunities also took into account the physical risks and dependencies identified in each area.

Thus, a preliminary list of impacts, together with the impact-related and impact-independent risks and opportunities was prepared and submitted for an applicability assessment to the decision-making stakeholders. This process and the related evaluations took place between October and December 2025. Decision-making stakeholders are process owners from different departments, from all SNN Group's subsidiaries and branches included in the process of analysing the material topics and also in the sustainability report for the aspects

related to the impacts, risks and opportunities identified in the ESG areas (Environment – Social and Governance). Given the level of expertise and knowledge required to assess the risks and opportunities, no external or non-decision-making stakeholders were involved.

The evaluation of the material topics and stakeholder engagement was carried out through focus groups on each ESG area. Focus group participants were sent and presented with an MS Excel tool created specifically for this assessment which included each impact identified in the ESG areas. In the focus groups the tool was presented and each impact was discussed. The evaluation scores for each criterion were approved by the majority of those present. Stakeholder consultation and involvement of the Board of Directors in impact information and validation ensured inclusion of the relevant impacts resulting from the SNN Group's own activities, business relations geographical areas of the sites or other factors whereby the SNN Group or the individual entities could cause a positive or negative effect on the environment, the people, the society or the economy.

The impact assessment process is based on a nuclear industry-specific integrated approach, using tools such as Encore, and consulting internationally recognised resources such as the UN Impact Radar and the OECD guidelines. The SNN Group complies with the ESRS standards in its reporting, and analyses in detail the value chain and the business relations to identify any direct and indirect impacts. Moreover, it benchmarks itself against international competitors in the industry, in order to adopt relevant and necessary measures, and integrate such into a compliant and substantiated process.



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## Stakeholder identification and consultation

The first step in the process of identifying and assessing the significant impacts, risks and opportunities, i.e. analysing the materiality issues, was to identify relevant and important stakeholders to be included in the process. In the double materiality assessment process, stakeholders fall into two broad categories, namely internal and external. The following categories have been identified and involved in the process:

### Internal:

- Employees holding management/decision-making positions/ownership for certain data, processes and/or procedures that are relevant to sustainability reporting;
- Employees and other workers of the Company (such as workers in the value chain)
- Representatives of the Company's trade unions
- The Board of Directors, to review the final results

### External:

- Media publications
- Academia (faculty/university representatives)
- Central authorities/local authorities/stock market institutions
- Local authorities (mayors, local or county councils)
- Industry organisations/associations
- Industry companies/business partners
- Non-Governmental Organisations
- Shareholders and investors
- Institutions setting and assessing standards
- Electricity customers
- Suppliers

- Local community representatives (e.g., Local Community Consultation Committee)

These are further divided into two categories that are essential for SNN's Double Materiality Assessment process:

### Decision-makers:

- Employees holding management/decision-making positions/ownership for certain data, processes and/or procedures that are relevant to sustainability reporting;
- Representatives of the Company's trade unions
- Board/Board of Directors

### Non-decision-makers:

- Employees (of one of the SNN entities)
- Employees and other workers of the Company (such as workers in the value chain)
- Media publications
- Academia (faculty/university representatives)
- Central authorities/local authorities/stock market institutions
- Local authorities (mayors, local or county councils)
- Industry organisations/associations
- Industry companies/business partners
- Non-governmental organisations
- Shareholders and investors
- Institutions setting and assessing standards
- Energy customers (distributors, transport operators, industrial consumers...)
- End-user energy suppliers
- Local community representatives (e.g., Local Community Consultation Committee)

Decision – making stakeholders were tasked with assessing both impact materiality (the impact that the SNN Group has on the environment, people or the economy) and financial materiality (the effect that the SNN Group experiences as a result of relevant and applicable risks and opportunities). The processes for each step are detailed in the chapters for each material topic (E1 – E5, S1 – S3 and G1). The main criterion for selection was their expertise in the ESG (Environment, Social and Governance) area. They were selected from the various departments of the SNN Group's subsidiaries and branches included in the process of analysing the material topics and the sustainability report. Thus, this approach ensured a relevant and representative coverage of each subsidiary, reflecting the importance and impact perceived by external parties.

The decision to involve the decision making stakeholders was based on the need to ensure a rigorous assessment of the impacts, short and long term estimates, as well as the connectors and converters specific to each entity. The selected stakeholders are decision-makers with responsibilities in relevant material areas. Certain stakeholders may be involved in assessment on one or more topics in areas E, S or G depending on their roles, responsibilities and expertise. Decision – makers were able to contribute by validating the impacts identified, modifying them where necessary, and identifying new impacts. They were also able to signal the non-applicability of certain impacts and were able to actively contribute to the adjustment and updating of impact assessments, given the complexity of the nuclear industry.



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The 2025 analysis involved 35 decision-making stakeholders for the environmental assessment, 23 decision-making stakeholders for the social assessment, and 14 decision-making stakeholders for the governance assessment, sitting in 4 focus groups that addressed the ESG areas listed above.

Non-decision-making and external stakeholders only participated in the materiality part of the impact between November and December 2025. Their role was to validate and assess the impacts identified. Based on a desire for transparency, communication and a willingness to involve internal employees in this process, the category of non-decision-making stakeholders was created, which gave the opportunity to each employee willing to address sustainability issues relevant to the company and to express their opinion thereon. By involving external stakeholders it was also intended to contribute to the quantification of the impacts through their perception and degree of relationship with the SNN Group. This ensured that they were included in the process and their views were taken into account.

The non-decision-making stakeholders were involved in the SNN Group materiality assessment process via an online questionnaire distributed to the categories of stakeholders identified as important in the first stage. As many as 109 respondents participated in the non-decision-making stakeholder questionnaire, falling into different categories as follows:

- 89 own employees of one of SNN entities
- 4 workers in the value chain (of another company providing direct services on SNN sites)

- 5 academia representatives (faculty/university representatives)
- 1 representative of industry organisations or associations
- 1 representative of non-governmental organisations;
- 1 investor or shareholder
- 1 representative of institutions setting and assessing standards
- 5 suppliers
- 2 representatives of the local community (e.g., the Local Community Consultation Committee)

Questionnaires were also sent out to media outlets, local authorities, regulators or stock market institutions, or local authorities, as well as to other business partners or companies in the industry of customers of the SNN Group, but no replies were received from them during the questionnaire's available time. Improvements are envisaged with regard to the involvement of stakeholders identified as important for the next revalidation exercises of the material topics.

### Methodological issues – Impact materiality

The impacts were subject to the following evaluation criteria included in the materiality measurement tool distributed to decision-making stakeholders:

**1. Applicability** is the defining criterion for deciding whether the impact is relevant and applicable to the company. If impacts are not applicable to the company,

they have not been further analysed and included in the assessment.

**2. Type of impact** distinguishes actual impacts (that already exist or are already occurring) from potential impacts (that may occur in the future) that the SNN Group wishes to consider

**3. Likelihood** measures the probability that the impact will occur. Likelihood was measured as a score from 1 to 5 as explained in the table below. In the case of actual impacts, a maximum score (of 5) was given in order to give current, existing or highly likely to materialise impacts a higher materiality. Potential impacts were given a likelihood score between 1 and 4 but the option to give the maximum score to a potential impact remained open if stakeholders decided that there was a potential impact with a very high likelihood of materialisation. In this way, a clearer picture of the existing impacts directly affecting the company is ensured.

1	Rare likelihood
2	Unlikely, it could materialise at some point
3	Possible, it could materialise at some point
4	Likely, it will probably occur in most circumstances
5	Certainty, it is expected to materialise in most circumstances



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**4. Nature of impact** the criterion by which negative impacts are distinguished from positive impacts by their nature and the effect they may have on the company.

**5. Irreparable nature** measures the extent to which the impact can be mitigated, only in the case of negative impacts, for positive impacts irreparable nature is not filled in and is not taken into account in the materiality calculation. Irreparable nature was measured with a score from 1 to 5 as explained in the following table:

1	Full mitigation – the initial situation is 100% restored
2	Major mitigation – restores the initial situation up to 75%
3	Moderate mitigation – restores the initial situation up to 50%
4	Minor mitigation possible – restores the initial situation up to 25%
5	No reparation possible – no possibility to restore the initial situation

**6. The scale (or size)** measures the severity of the impact or its benefit in the case of a positive impact. The scale was measured as a score from 1 to 5 as explained in the table below:

1	Severe negligible – the actions that create impacts have negligible negative consequences on environmental, social and governance dimensions.
2	Severe minimum – the actions that create impacts have reduced negative consequences on environmental, social and governance dimensions.
3	Severe medium – the actions that create impacts have some negative consequences on environmental, social and governance dimensions.
4	Severe – the actions that create impacts have quite serious negative consequences on environmental, social and governance dimensions
5	Very Severe – the actions that create impacts have extremely serious negative consequences on environmental, social and governance dimensions

**7. The scope (or extent)** measures the extent of the positive or negative impact. This was measured by a score from 1 to 5 as described in the following table:

1	Small – scale impact on population and ecosystem with negligible economic costs.
2	Minimum impact on population and ecosystem with minimum economic costs.
3	Medium – scale impact on population and ecosystem with medium economic costs.
4	Large – scale impact on population and ecosystem with high economic costs.
5	Very large – scale impact on population and ecosystem with very high economic costs.



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**Timeframe:** This term measures the timeframe of the identified impact. The proposed score for this measurement scale was used according to the European Sustainability Reporting Standards (ESRS): Short term (up to one year); Medium term (between 1 and 5 years) and Long term (more than 5 years).

**Location on the value chain:** Through the materiality assessment process, it is necessary to identify the significant Impacts, Risks and Opportunities arising from direct and indirect business relationships along the value chain. We need to consider the upstream and downstream stakeholders as well (e.g.: customers, suppliers, distributors and other business partners) that are affected by the Company's activities in a positive or negative sense. **The proposed localisation options were: Upstream, Downstream, Own activities and Along the value chain, and are defined below:**

**Upstream:** This term refers to all activities and processes that take place before a product or service is actually produced. This includes suppliers of raw materials, materials, components and resources used in production. Examples: sourcing raw materials, logistics and transportation from suppliers, initial processing of materials. Impacts in the upstream area may occur, for example in the distribution of goods.

**Downstream:** This term refers to the activities that take place after the product has been produced until it reaches the final user. These include distribution and transport, energy suppliers, other energy producers.

**In own operations:** These are the internal operations, involving all the production, manufacturing, administration and management processes that take place within the organisation. These activities include production, human resources management, technology and innovation. Examples: production process, internal resource management, quality control, administrative functions This level is selected when activities that can create positive or negative impacts occur through the Company's operations. For example, certain leaks that can lead to water or soil pollution.

**Along the value chain:** This level is selected when the analysed impacts, risks or opportunities extend or are applicable to both the company's own activities and the upstream and/or downstream value chain.

The materiality of the impacts was calculated by multiplying **Likelihood** and **Severity** (represented by the maximum score between **Scale, Purpose** and **Irreparable nature** in the case of negative impacts). Therefore, using a scoring scale from 1 to 5, the most significant impacts could get a maximum score of 25. In order to bring them to the same level of comparison, the impacts have been divided by 25 (the maximum potential score that an impact can have) and thus given a percentage score between 0 and 100%.

For human rights impacts, an additional factor of importance was considered for severity. Thus, for these impacts the severity score was multiplied by 1.5, thus increasing the final materiality.

The main task included in the questionnaire applied to non-decision-making stakeholders to measure materiality was for them to score the level of impact. Respondents were able to rate the impact with a score from 1 to 5 according to their opinion and knowledge about the field and the impact. Same as with the decision-making stakeholders, the maximum score that could be obtained (if all respondents rated the impact with 5 for example) was calculated and divided by the actual score obtained to bring the final score to a comparable level. This resulted in percentage scores on each of the impacts obtained.

The assessment by non-decision-making and external stakeholders was weighed less than the assessment of decision-making stakeholders. Given the expertise and level of knowledge of the identified impacts of the decision-making stakeholders, they were given an importance of more than 70%, resulting in an importance of 30% for the other stakeholder categories.

In order to obtain the final representation of impact materiality, a weighted average was calculated between the percentage scores obtained for each impact as assessed by decision-making stakeholders and the scores by non-decision-making and external stakeholders. The materiality result was calculated according to the formula :  $(\text{score of decision-making stakeholders} * 0.7) + (\text{score of non-decision-making \& external stakeholders} * 0.3)$ .

This ensures a fair representation of all impacts identified and assessed, including the views and interests of stakeholders in a balanced way. Following the material issues analysis exercise, a



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consolidated materiality threshold (of decision-making, non-decision-making and external stakeholders) of 30% was set. Thus, impacts identified with a consolidated materiality of less than 30% are considered to be impacts of low, non-material materiality.

## Methodological issues – Financial materiality

After having examined the guidance and instructions in ESRS and other international instruments (Encore), and internationally recognised resources (the UN Impact Radar and the OECD guidelines) or based on the analysis of the SNN Group's activity, business relations and value chain and its risk register, a preliminary list of impacts, together with the impact-related and impact-independent risks and opportunities was prepared and submitted for an applicability assessment to the decision-making stakeholders. Identification and assessment of the risks and opportunities gave due regard to the dependencies that the SNN Group may have in different contexts.

Risks and opportunities have been analysed for the financial part of materiality, independent of impacts, using 4 measurement criteria:

**1. Applicability**, which is the relevance of the risk or opportunity, i.e. its applicability to the company. If the risk or opportunity is not applicable to the company, they have not been analysed and included further in the assessment.

**2. The financial effect** measures the financial magnitude felt by the company in case of materialisation of risks or

opportunities. For this exercise a measurement scale and potential effect quantification was used as explained in the table below:

Financial effect	Explanation of financial effect
1	Minimum financial effect (less than 0.2% of turnover)
2	Moderate financial effect (over 0.2% but less than 1% of turnover)
3	Significant financial effect (over 1% but less than 2.0% of turnover)
4	High financial effect (over 2.0% but less than 5.0% of turnover)
5	Very high financial effect (over 5.0% of turnover)

**3. Likelihood**, as with impact assessment, measures the likelihood of risks and opportunities to materialise. For probability a score from 1 to 5 was used to predict both the likelihood and the timeframe in which the risks or opportunities could materialise, as can be seen in the following table:

Likelihood	Likelihood explained
1	Very low (only once in the next 10 years)
2	Low (in the next 5 – 10 years)
3	Medium (in the next 2 – 5 years)
4	High (in the next 1 – 2 years)
5	Very high (in less than 1 year)

**4. Location on the value chain**, which included the selection of the location of risks or opportunities. The localisation options were similar to those described in the impact assessment chapter.

The role of this exercise is to identify the financial risks and opportunities arising from the material impacts identified on each material topic and to identify the potential financial effect they could have. The materiality of risks and opportunities was given by the multiplication between the financial effect and the likelihood. As with the impacts, the scores were consolidated for the sub-sub-topics, sub-topics and related material topics.

The same 30% threshold was kept in place to determine also the materiality of risks and opportunities. The material risks and opportunities are presented at the beginning of the sections addressing the topics identified as material: E1 – E5, S1 – S4 and G1.



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## The process for identification of the impacts, risks and opportunities

The internal procedure that defines and establishes the Dual Materiality Analysis is used to account for how impacts, risks and opportunities are reassessed and re-analysed on an annual basis. Once completed, the process is validated and the results are approved by the Board of Directors.

Risk assessment was based strictly on the ESRS guidelines and the internal materiality procedure. The SNN Group's risk management procedure has not identified ESG risks in accordance with the CSRD Directive.

The process followed to identify and assess opportunities is defined in the internal materiality procedure. Opportunities are managed, depending on area, by the heads of the relevant departments and are overseen by the ESG Committee.

The opportunities identified and subsequently assessed as significant were matched with the positive or negative impacts of the SNN Group, as well as with related material topics. Consideration was given to the benefit that these opportunities can bring to the SNN Group in financial terms in relation to turnover, as described above, and in a time horizon in which these opportunities could be turned to value. Opportunities were assessed by the decision-making stakeholders, for each ESG area, who reviewed the assumptions and forecasts related to such opportunities, based on their own experience in the SNN Group and the specific knowledge acquired within the departments they are part of.

Several process changes have been made compared to the previous reporting period as follows:

### Changes in impacts, risks and opportunities:

- The identified impacts, risks, and opportunities have been rewritten where necessary to make sure that they clearly and concisely meet the requirements and definitions set forth by the ESRS standards.
- Unlike previous exercises, the analysis for this period also focused on identifying impacts, risks, and opportunities at sub-topic and sub-sub-topic level (as defined in accordance with the ESRS requirements), thereby providing enhanced granularity and detail.

### Assessment of the physical and transition risks:

During this reporting period, the process has been adapted to include an ESRS-compliant assessment of the physical risks associated with climate change, and of the transition risks. This is a significant development from the previously used methods.

### Rephrasing and broadening the stakeholder categories and involvement of non-decision-making stakeholders:

The categories of stakeholders involved in the process have been reconsidered. This process included both a rephrasing of the existing categories and addition of new categories to increase the engagement and relevance of the results.

The past questionnaires for non-decision-making stakeholders have been streamlined, with the sole objective of assessing the materiality they assign to the

applicable impacts determined by the decision-making stakeholders. The other previously used questions (concerning the type of impacts, their characteristics, the time horizon or localisation in the value chain) have been removed, as they did not significantly influence the results and required an advanced level of knowledge about the Company's particularities. For the current exercise, one single questionnaire, encompassing all the topics and impacts identified in the ESG areas, has been applied. The questionnaires sent out to non-decision-making stakeholders were available also in English, which allowed us to broaden the analysis and to involve international stakeholders.

The questionnaire included an open-ended question aimed at identifying new impacts, not covered by the current analysis, that could be considered significant by the responding stakeholders. These answers have been properly reviewed, and any relevant aspects will be integrated in future reporting should relevant impacts be identified that are not already addressed in the existing processes.

The double materiality assessment is reviewed on an annual basis, during the pre-reporting period. The material impacts, risks and opportunities are presented in the relevant chapters addressing each topic, sub-topic or sub-sub-topic. In each future assessment, the SNN Group intends to improve both the methodology and the completeness of the process in relation to the ESRS requirements, while maintaining increased transparency for stakeholders.



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Further to the materiality assessment carried out in 2025, all previously identified or newly identified or rephrased impacts, risks and opportunities have been re-analysed and re-assessed, as described in detail in the previous chapter. The assessment’s results, including the assessment of both the internal and external stakeholders, conclude that all ESRS main topics (E1-E5, S1-S4 and G1), including one additional topic, are material. Some sub-topics or sub-sub-topics have been defined as non-applicable, as shown in the previous chapter (SBM-3). The maximum score obtained by an impact related to a sub-topic or sub-sub-topic represents the consolidated materiality of a sub-topic or sub-sub-topic. Subsequently, the maximum score obtained by sub-topics or sub-sub-topics related to a main material topic represents the consolidated materiality of that topic. An impact has become significant if the methodological calculations, as presented in the previous chapter, resulted into a materiality greater than or at least equal to 30%.



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## SNN Group Climate change



**Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3, IRO-1**



In the last double materiality assessment, all physical and transition risks provided as examples in the “*Climate Hazard Classification*” (Commission Delegated Regulation (EU) 2021/2139) and Examples of Climate-Related Transition Events (examples based on the TCFD classification) were assessed. The assessment identified the chronic temperature-related physical risk as material: Temperature change (air, freshwater, seawater) and market-related transition risk: Uncertainty in market signals.

Assessment of the physical and transition risks involved a general examination of the potential effect they may have on the Company's entities and the value chain. All the risks subject to assessment were considered, but some were declared not applicable depending on the geographical location of the sites, the business model or the activities of the Company.

In order to understand the Company's resilience, for each physical and transition risk, the potential effects that the risks may have on the Company's assets, activities or business relations were analysed, taking into account the financial perspective, as well. Group-wide, SNN has put in place several risk management measures, which are also considered in the resilience assessment. The likelihood and frequency of occurrence of such risks for the Company, depending also on the geographical areas of the SNN's sites, were criteria applied in the physical and transition risk assessment.

The physical and transition risks rated as material were then subjected to an NGFS (Network for Greening the

Financial System) climate scenario-based analysis exploring various future climate trajectories, based on different policies and actions to understand the potential impacts associated with each scenario.

In terms of the surrounding macroeconomic trends, they focus on reducing dependence on fossil fuels. Thus, transition to alternative energy resources will change the global economic structure, while fostering the industries that invest in green technologies and reducing the demand for traditional fuels.

Low emission targets can only be attained significant investments are made in upgrading the energy infrastructure and in further researching the renewable and nuclear energy.

The role of nuclear energy will grow globally. In the aftermath of COP28, the international commitments taken up to triple the nuclear capacity by 2050 are signs of a widespread recognition of nuclear energy as an essential solution to reduce emissions and ensure global energy stability. Nuclear power is expected to become a fundamental pillar in the global energy mix, contributing up to 25% of electricity production in the EU, thanks to its ability to produce emission-free electricity.

Thus, the energy mix will change to include more renewable sources (wind, solar) and advanced nuclear technologies, thus minimising emissions and ensuring a sustainable energy production. Against this backdrop, Romania's 2025-2035 Energy Strategy towards 2050 stresses out the need to maintain a diversified, resilient



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and low-emission energy mix, in which nuclear energy plays an essential role for the stability of the national energy system. The long-term greenhouse gas emission reduction strategy – “A Neutral in 2050” supports this framework by identifying nuclear energy as a key driver in achieving climate neutrality. The document foresees refurbishment of Units 1 and 2 of Cernavoda NPP, construction of two new nuclear units, and development of a power plant with small modular reactors. These measures are essential to strengthen the national energy security.

As regards the strategic investments, the availability of consolidated flow of global investments, estimated at over USD 100 billion annually, will boost the development of nuclear infrastructure and engineering innovations to upgrade the existing capacities. Small modular reactors (SMRs), which are featured in Romania’s Energy Strategy, will play an essential role, offering flexible and tailored solutions for emerging and developed markets, and facilitating fast deployment and safe operations.

**SNN’s strategic investment portfolio is estimated for the next decade (2025 – 2035) at EUR 20 billion and is structured on three fundamental directions, each with a major impact on Romania’s nuclear sector development and energy security, as follows:**

**I.**

**Production capacity extension and diversification**

With investments of more than EUR 15 billion, the Company aims to increase and diversify its production

capacity, including through new units and cutting-edge technologies. The main investment programmes covered by this strategic direction are:

1. Development of Cernavoda NPP’s Units 3 and 4
2. Development of small modular reactors (SMR)

**II.**

**Strengthening the safety, reliability and operating excellence of the existing capacity**

With investments of more than EUR 4.6 billion, SNN is upgrading and maintaining its current infrastructure, ensuring the optimal and safe operation of the nuclear power plant. The main investment programmes covered by this strategic direction are:

1. Refurbishment of Cernavoda Unit 1
2. Development of the Intermediary Spent Fuel Storage Facility (DICA)
3. Development of the Emergency Facility Building
4. Upgrading and development of the Nuclear Fuel Plant
5. Upgrading, refurbishment and development of the Uranium Concentrate Processing Plant
6. Digital transformation and resilience
7. Other pipelined significant investments

**III.**

**Sustainability and innovation**

With investments of over EUR 0.4 billion, SNN promotes innovative and sustainable solutions that contribute to the circular economy and the development of a diversified portfolio of products and services. The main investment programmes covered by this strategic direction are:

1. Deployment of the heavy water tritium removal facility
2. Diversification of the product portfolio with production of medical radioisotopes

With this strategic approach, SNN consolidates Romania’s position as a key player in clean energy production, and generates economic, social and environmental benefits at national and regional level, thus contributing to the energy security, decarbonisation and sustainable development of the country.

The timeframes applied were similar to those used for the rest of the risks and opportunities assessed in the double materiality assessment process, and according to the European Sustainability Reporting Standards (ESRS): Short term (up to one year); Medium term (between 1 and 5 years) and Long term (more than 5 years). For the GHG emission reduction targets, time horizons have been estimated every 5 years until 2050.







The financial effect was estimated according to the financial impact experienced by the Company, similar to all the risks and opportunities assessed in the double materiality assessment process, by reference to the Company’s turnover and estimating the risks from less than 0.2% to more than 5% of its turnover. The risks rated as material have been estimated with an expected financial effect higher than 1%, but below 2% of turnover.

**Physical risk mitigation actions and resources – Temperature change (air, fresh water, sea water)**

When extreme weather warnings are received, the Shift Leader Dispatchers may decide to call the Committee to meet and manage the situations generated by Natural External Events, acting in accordance with specific procedures. (03420-OM-PU-D1)



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According to Chapter 2 of the FSR and the Operating Manual 2-71210-OM-001, in winter, the temperature in the suction basin is maintained in the range of 6-8°C to avoid ice crystal formation by recirculating a fraction of the CCW flow. For borderline situations (very low temperatures and both units shut down), steam bubbling operating procedures are applied at the Distribution Basin – Screen House.

The identified vulnerabilities/risks are addressed done in accordance with the plant's normal processes.

The issues related to floods from heavy rainfall were solved by modifying the sills of the potentially exposed buildings.

For known vulnerabilities, compensatory measures are already in place, such as operational measures to maintain the availability of the systems (e.g., continuous cleaning of the HX – RCW/RSW to ensure high efficiency of the heat exchangers).

Replacement of the RCW/RSW heat exchangers (HX) with more efficient ones is also considered (for the purposes of Unit 1 refurbishment (RT-U1), in order to increase the operating margin of the RCW system (e.g.: the temperature of the recirculated water must not exceed 35°C, which under current conditions is reached for a Danube water temperature of 30.2 °C for U1, and 29.7 °C for U2, according to 79/71310-ATH-043, 82-71310-ATH-044 "RSW/RCW U1/U2 thermohydraulic analysis taking into account RSW operating temperatures higher than as set out in the design. Corrective measures to increase design margins").

The operating limits are well defined and can lead to measures such as reactor setback or shutting down the units when the maximum operating values of the process parameters leading to their exceeding are reached.

Any vulnerabilities newly identified by the analysis, for which no action is already underway, will be addressed through the CAP process, and ACRs will be issued for them.

Cernavoda NPP's approach is to classify the analysed systems into two categories: Systems directly exposed to environmental conditions (e.g.: Ventilation, Service Water, Transformers), and indirectly exposed systems, whose operation depends on the operation of the directly exposed systems (e.g.: equipment placed in ventilated/air-conditioned rooms). The directly exposed systems will be the focal point of vulnerability addressing. For indirectly exposed systems, the developments in the parameters of interest will be monitored to determine the trends.

The latest assessment and action identification document is coded IR-01320-046 "GAP Analysis according to the INPO Guide 24-002 - Climate Vulnerability Assessment". The content and the methodology applied to prepare the existing documents of Cernavoda NPP were compared in terms of the plant design's resilience to climate change, against the recommendations and methodology presented in INPO 24-002 "Climate Vulnerability Assessment". This is necessary to ensure that Cernavoda NPP will be prepared according to the latest industry standards to cope with severe environmental conditions, without any impact on Nuclear Safety or Output.

According to INPO-24-002, the upward trend in global warming (in the next decade (2025-2035)) is expected to lead to a significant increase in the frequency, intensity and duration of the External Events of Natural Origin (EENOs), save for earthquakes. Actions to improve the design and operating procedures of Cernavoda NPP, as presented in the Action Plan of this document, have been identified as measures able to increase SSCEs protection against the potential effects of climate change.

It is important to note that the reviewed references had been written before publication of the INPO 24-002 Guide; hence, while the methodology applied to identify and assess the SSCEs potentially vulnerable to climate change is different, the analysis results are similar and no significant vulnerabilities in either the design or the operating procedures of Cernavoda NPP's units have been identified.



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**The proposed actions that emerged from this latest assessment are:**

- Revise PU-D1 WORKSHEET NO. 51 to include the parameters associated with the Orange/Red codes of extreme air temperature, solid/liquid precipitation and intense wind.
- Reassess the EPS-SCA ventilation/air conditioning/heating system with a view to changing it so as to operate at the outdoor air temperatures range from -30°C to +50°C.
- Reassess of the Ventilation/Air Conditioning System in the MCR with a view to changing it so as to operate at high air temperatures up to +50°C.
- Check the operation of the mobile Diesel units in instances where the outside air temperatures are -30°C/+50°C.
- Appoint in TD a contact person with Apele Romane to monitor and periodically report on the completion status of the hydraulic engineering works in Bala area, which Cernavoda NPP needs in order to operate with 4 units.
- Cernavoda NPP has not integrated in its procedures the recommendation to review the Climate Vulnerability Assessment once every 5 years at most, using 10-year climate predictions.
- At Cernavoda NPP, there is a BBM (Building Behaviour Monitoring) programme in place which includes, among other activities, visual inspections of the buildings in order to timely detect and correct deficiencies, and to thus avoid occurrence of events due to strong wind.
- In terms of the loads on buildings and structures on the Cernavoda NPP site, the reports

- 82-01012-CTR-004, 79-01012-CTR-006 and 79-01012-CTR-008 consider different combinations of events, in accordance the NBCC, 2020 Edition for BOP buildings and CSA N291:19 for nuclear buildings.
- The combinations of events were factored into the analysis of the vulnerable systems and in the field inspections.
  - For the buildings and structures under review, reports 82-01012-CTR-004, 79-01012-CTR-006, and 79-01012-CTR-008 provide the Cliff Edge values.

In order to prevent the transition risk associated with uncertain market signals, potential sudden regulatory changes in the energy market (e.g., regulated sales mechanisms, price capping, etc.) and potential major legislative amendments impacting on project development or human resources are monitored. Thus, good advocacy and risk management practices are taken into account so that the adverse financial effects are not significantly experienced at Group level.

After having analysed all physical and transition risks provided as examples in the “Climate Hazard Classification” (Commission Delegated Regulation (EU) 2021/2139) and Examples of Climate-Related Transition Events (examples based on the TCFD classification), these were rated and material, using a methodology based on risk likelihood and occurrence frequency and the financial effect that the Company may experience should they occur:

- chronic temperature-related physical risk: Temperature change (air, fresh water, sea water); and

- market-related transition risk: Uncertainty in market signals.

These were analysed based on four NGFS (Network for Greening the Financial System) climate scenarios:

- Orderly transition – below 2 degrees Celsius
- Disorderly transition
- “Hot house world” scenario
- “Too little, too late” scenario

The resilience analysis, including that based on climate scenarios, was carried out at a general level, considering the relevance of risk occurrence depending on the geographical area of the sites and their exposure to hazards, the functioning and existence of the Company or its business relations along the value chain. The Company’s capacity to adjust and adapt its strategy or business model to climate change was analysed at a general level within the double materiality assessment, taking into account the physical or transition risk management measures that the SNN Group has put in place and pipelined for risks.

The environmental, social and governance impacts, risks and opportunities were identified and assessed as part of the dual materiality process, in an internal workshop and in consultations with other relevant sources, such as the permits needed for duly operation of the sites. The ESG risks entered in the risk register are integrated into the SNN Group’s business strategy, but the 2023 – 2027 Administration Plan covers also issues related to nuclear safety and security risks for the staff, population, environment and production assets. Thus, the nuclear



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units operate under nuclear safety and security conditions with a view to minimising the risks attached to exposure of the staff rendering professional activities, the population and the environment to ionising radiation.

The reassessment of material topics undertaken in 2025 for this Report removed the impacts and risks previously identified under the topic “Climate change adaptation” related to flood, fire, extreme weather events and high temperatures. For the current exercise, physical risks have been identified using the “Classification of climate-related hazards – Commission Delegated Regulation (EU) 2021/2139” and have been analysed in the materiality assessment as detailed below. Thus, the matters referenced and dealt with in the previous report have not been omitted, but only reclassified to comply with ESRS.

Also, the risk “Improper operation of the nuclear plant can lead to additional activation of the diesel back-up installation” was left out of the previous risk classification because it is not a part of the Classification of climate-related hazards. It was simply re-analysed as a risk relevant identified to the Group's activities.

The impact “Energy production with zero direct GHG emissions from the core business” was placed for the current exercise only under the topic “Climate change mitigation”; before, it used to fall under the sub-topic “Efficiency”. New impacts, risks or opportunities were also considered in the FY 2025 materiality assessment; however, further to assessment, only two physical risks were found to be material in the assessment, with the impacts, risks and opportunities identified in the last two

years as material remaining similar after the reassessment. The material impacts, risks and opportunities for 2025 can be seen in the following tables.

### Material impacts

Topic	Sub-topic	Impact(s)	Applicable
Climate change	Climate change mitigation	<b>Current, positive impact:</b> Energy production with zero direct GHG emissions from the core business.	Cernavoda NPP
Climate change	Climate change mitigation	<b>Current, negative impact:</b> Operational GHG emissions (Scope 1 + Scope 2 + Scope 3)	SNN Group
Climate change	Climate change adaptation	<b>Current, positive impact:</b> Supporting other energy sectors in the energy transition process.	Cernavoda NPP
Climate change	Energy efficiency	<b>Current, negative impact:</b> Operational energy consumption	SNN Group



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## Significant impacts and risks

Topic	Sub-topic	Connected Impact	Risk/Opportunity
Climate change	Climate change mitigation	Energy production with zero direct GHG emissions from the core business.	<b>Opportunity:</b> Efficient operation of SNN facilities, with investments in new production capacities for energy security and nuclear safety of its operations.
Climate change	Climate change mitigation	Operational GHG emissions (Scope 1 + Scope 2 + Scope 3)	<b>Risk:</b> Improper operation of the nuclear plant can lead to additional activation of the diesel back – up installation
Climate change	Climate change adaptation	Supporting other energy sectors in the energy transition process.	<b>Opportunity:</b> In the process towards the green energy transition, the other green energy production sectors (solar, wind, hydro) can be supported in terms of their capacity to be a backup source of alternative clean energy.
Climate change	Climate change adaptation	Impact-independent	<b>Chronic physical risk</b> (temperature-related): Temperature change i air, fresh water, sea water
Climate change	Climate change adaptation	Impact-independent	(Market-related) <b>transition risk:</b> Uncertainty in market signals
Climate change	Energy efficiency	Operational energy consumption	<b>Opportunity:</b> Good management of operations and facilities related to energy efficiency can bring benefits in terms of lower costs and lower GHG emissions.

## Physical risks

The physical risks identified using the “Classification of climate-related hazards Commission Delegated Regulation (EU) 2021/2139” have been analysed in the materiality assessment using the methodology applied for the financial materiality. Following this analysis, the risks that emerged as material were further analysed based on the NGFS (Network for Greening the Financial System) climate scenarios, using 4 types of scenarios: Orderly transition – below 2 degrees Celsius; Disorderly transition; “Hot house world” scenario; “Too little, too late” scenario. The exposure of the Group's sites, activities or business relations to climate-related hazards has been analysed at a general level taking into account the physical risk management measures that the SNN Group has put in place and pipelined for risks.

The timeframes applied for physical risks were similar to those used for the rest of the risks and opportunities assessed in the double materiality assessment process, and according to the European Sustainability Reporting Standards (ESRS): Short term (up to one year); Medium term (between 1 and 5 years) and Long term (more than 5 years). No other time horizons have been defined for to the expected life of assets, strategic planning and capital allocation plans at this time.

The exposure and sensitivity of the sites, the group's activities or business relations to physical risks has been assessed in order to perform the risk analysis. Elements such as geographical location of the sites (e.g., by locality, region, county), likelihood of risk occurrence and risk occurrence frequency, if it had occurred in the past, were



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taken into account. We also estimated the effect it may have on the Company, including in financial terms.

### Transition risks

The transition risks identified using the examples of climate-related transition events based on the TCFD classification have been analysed in the materiality assessment, using a methodology similar to that applied for the financial materiality. Following this analysis, the transition risks that emerged as material were further analysed based on the NGFS (Network for Greening the Financial System) climate scenarios, using 4 types of scenarios: Orderly transition – below 2 degrees Celsius; Disorderly transition; “Hot house world” scenario; “Too little, too late” scenario.

The exposure of the Group's business or business relations to transition events has been analysed at a general level taking into account the possibility of such risks occurring and the effects that the SNN Group has experienced in the past, if it has already experienced such a risk, as well as the financial effect that the SNN Group may experience should such a risk occur. The SNN Group's management, adaptation and mitigation measures for the risks concerned have also been considered.

The exposure and sensitivity the group's activities or business relations to transition risks has been assessed in order to perform the risk analysis. Elements such as likelihood of risk occurrence and risk occurrence frequency, if it had occurred in the past, were taken into account. We also estimated the effect it may have on the Company, including in financial terms. Once the transition risks have

been identified and their materiality has been assessed, the risks that emerged with a materiality above the set threshold (of 30%) were subjected to a climate scenario-based analysis, using the referenced 4 types of climate scenarios NGFS (Network for Greening the Financial System).

The SNN Group meets the general criteria concerning making a substantial contribution to climate change mitigation through its eligible activities and the EU Taxonomy:

- Electricity generation from nuclear energy in existing installations (4.28) and
- Construction and safe operation of new nuclear power plants for the production of electricity or heat, including hydrogen production, using best available technologies.

At this time, the necessary studies to meet the additional criteria for marking a substantial contribution to climate change mitigation have not been completed. Thus, it was considered that the 2 activities are eligible under the EU Taxonomy, but not aligned.

The production capacity of the SNN Group will be expanded in the coming years through the refurbishment of Unit U1 of Cernavoda NPP and the development of Units 3 and 4. Thus, the emissions from these processes are expected to increase by 2030. However, this increase is offset by the investments (supply activities and construction and assembly) made to refurbish U1 for a new lifecycle and to build and commission U3 and U4, and has no direct connection with the commercial operation of the nuclear power units in use and or the additional after-completion benefits generated by the operation of 4 nuclear power units that will provide almost

40% of Romania's energy needs on the Cernavoda NPP site.

Nuclear energy is also considered a low-carbon energy source (LCE) according to the EU-wide studies, with lifecycle greenhouse gas (GHG) emissions well below 100 g CO<sub>2</sub>e/kWh, placing it among the lowest carbon technologies available.

The physical and transition risks identified as material were assessed based on 4 types of NGFS (Network for Greening the Financial System) climate scenarios:

- Orderly transition – below 2 degrees Celsius: The representative scenario for an orderly transition assumes immediate action to reduce emissions, in line with the Paris Agreement, and calibration to keep global warming below 2°C.
- Disorderly transition: The representative scenario for a disorderly transition presents a much more difficult path to achieving the goals of the Paris Agreement. In this scenario, the climate policy follows Nationally Determined Contributions (NDCs) by 2030.
- “Hot house world” scenario: It assumes that only the current policies are implemented. As a result, the climate targets set in the Paris Agreement are not met, leading to substantial physical risks in the medium and long term.
- “Too little, too late” scenario: It implies a delayed and divergent climate policy response among the world's countries, leading to high physical and transition risks.

Timeframes similar to the other risks and opportunities identified in the materiality assessment were used in the physical and transition risk assessment (Short Term: up to



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one year; Medium Term: between 1 and 5 years and Long Term: more than 5 years). Year 2100 was used as time horizon for the results that may occur depending on the climate scenarios used, following the NGFS methodology.

Simulation and analysis of the physical risks based on these NGFS scenarios considered the potential outcomes of the scenarios up to 2100 and the potential impacts that the Company may experience under each scenario.

Simulation and analysis of the transition risks considered the reaction of national or international policies, the technological change that may occur in the future, the development of carbon dioxide removal (CDR) technologies, the regional variation of policies and also the potential effects felt by the Company under each of the 4 scenarios.

Following this analysis, the “Hot house world” and “Too little, too late” scenarios show the a high severity of negative effects on the Company and its business relations, as well as on the environment, the people, the society or the economy. The other two scenarios show a lower severity of risks, the disorderly transition scenario being the most plausible under the current circumstances.

The climate scenario-based analysis was used to identify and assess physical and transition risks.

For physical risks, the assessment covered the exposure and sensitivity of the SNN Group's sites, activities and business relations. The specific geographical location (local, regional, county), the risk occurrence likelihood, the

frequency of its occurrence in the past and the potential financial effect on the Company were all taken into account.

Transition risks were analysed by assessing the exposure and sensitivity of the Group's activities and business relationships to economic, legislative and social changes. Consideration was given to the occurrence likelihood of these risks, their frequency following similar occurrences and the expected effect, including the financial impact.

As for the data used, the physical risk analysis was based on both general Company-level data and more detailed site-specific information. This methodology provided a proportionate and clear process for managing climate risks and identifying potentially significant risks.



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## SNN Group Climate change



### Climate change mitigation transition plan | *ESRS E1-1*



The SNN Group's Transition Plan is the strategic framework through which the Group defines its evolution direction in the context of the national and European energy transition, in accordance with the ESRS E1 requirements and the provisions of the CSRD Directive. The transition Plan was developed between 2025 and 2026 and is based on 2024 climate, social and operational data, as presented in the SNN Group's 2024 Consolidated Sustainability Report.

In 2024, SNN supplied 18.5% of Romania's total electricity production, consolidating its central role in energy security and in the low-emission energy mix.

In the reporting year, the Group's strategic projects are in various development stages:

- Unit 1 Refurbishment – preparation and design stage.
- Units 3 and 4 – engineering and pre-FID phase.
- SMR Programme – early stage/institutional development.

The Transition Plan builds on the information and analyses already reported in 2024, integrating the completed double materiality assessment, the completed climate and social policy framework, the greenhouse gas emissions inventory, the ESG risk structure, and the main characteristics of the Group's value chain.

The document provides a strategic direction for the periods until 2030, 2035, 2040 and 2050, in correlation with the evolution of the Group's major projects (Unit 1 Refurbishment, Units 3 and 4, SMR Programme), as per the status presented in the 2024 Sustainability Report. The

final time horizon (2050) is used for strategic projection purposes and will be reconfirmed annually depending on the evolution of the regulatory framework and the projects to invest in.

The SNN Group has looked into the compatibility of its strategy, business model and climate directions, as described in this chapter, with the scenarios devised to limit global temperature increase to 1.5°C, in line with the Paris Agreement and the European Union's objective of achieving climate neutrality by 2050.

This analysis is of a proportional qualitative and quantitative character, based on the available data, the current emission structure and the technological particulars of nuclear energy. This is not SBTi certification and does not imply any formal external validation.

The Group's climate directions have been analysed against the general trajectories associated with the scenarios limiting global warming to 1.5°C, with the following findings:

- Scope 1 and Scope 2: the absolute level of direct and indirect emissions from energy is already low, and the transition pathways aim to maintain and optimise this profile in the context of nuclear safety and business continuity.
- Scope 3: the approach is gradual and realistic, focusing on the major categories (capital goods, procurement of goods and services, transport, and recognising the dependence on the value chain and major investment projects, as well as on Law no. 99/2016 on sectoral procurement.



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- 2050 Horizon: the objective is to maintain a climate profile compatible with climate neutrality by reducing the emission intensity and optimising the value chain, without a complete elimination of all residual emissions.

Overall, the analysis shows that:

- the SNN Group's strategy and business model are structurally compatible with the objective of limiting global warming to 1.5°C;
- the described climate pathways are realistic, progressive and proportionate to the risk profile and emission structure;
- The Transition Plan is dynamic and will be updated as additional data becomes available, including on the value chain and new nuclear projects.

The comparison with the 1.5°C scenario was carried out at the principle level, using benchmarks from recognised climate scenarios (e.g., IPCC, NGFS) and the ESRS E1 requirements for 1.5°C compatibility.

No internal climate scenario model dedicated to SNN was built; reference trajectories for the energy sector were used and it was checked whether the nuclear profile and climate directions of the Group fall within a structural compatibility zone.

SNN Group's climate transition is built on a structured and gradual set of operational, technological, investment and value chain levers, adapted to the specifics of the nuclear industry and its long-term investment cycle. Given the nature of the activities carried out, the Group operates an

infrastructure with inherently low direct emissions, mainly generated by ancillary processes and support activities necessary to operate in nuclear safety conditions.

In this context, the decarbonisation approach is not aimed at reducing production or compromising operational performance, but at progressively optimising energy consumption, upgrading the ancillary processes and integrating climate criteria in investment decisions and in the relationship with the value chain. The Group's climate transition strategy is based on a differentiated approach at the operational entity level, reflecting the diversity of activities carried out by Cernavoda NPP, Pitesti NFP, FPCU Feldioara, ErgoNuclear and the support structures, including the HQ.

The decarbonisation targets are linked to the multiannual investment plans, the major nuclear projects in progress or in pipeline (refurbishment of Unit 1, Units 3 and 4, SMR project), and the strict nuclear safety obligations. Thus, the climate transition is integrated as an incremental, phased process, aligned with the Group's strategic objectives and the ESRS E1 requirements.

The analysis of the decarbonisation levers shows that the climate profile of the Nuclearelectrica Group is mainly determined by ancillary processes and indirect emissions from the value chain, especially from the category of purchased goods and services and capital goods. In this context, emission reduction is not based on a single structural measure, but on a coherent portfolio of complementary interventions, implemented in a gradual and differentiated manner.

At Group level, immediate-action levers focus on operational energy efficiency, ancillary consumption optimisation, administrative and industrial infrastructure upgrading, and reducing consumption across transport fleets and equipment. These measures give rise to cumulative benefits over the period 2025-2030, without affecting the safe operation of nuclear installations.

In the medium and long term, the Group's climate impact is significantly influenced by investment decisions and the evolution of major nuclear projects. The integration of climate criteria in the design, construction and operation of Units 3 and 4, Unit 1 and the refurbishment processes helps optimise the internal consumption and reduce the emissions intensity associated with the value chain in the long term.

The value chain is also an essential component of the Group's climate transition. Strengthening ESG requirements for suppliers, increasing transparency on Scope 3 emissions and working with strategic partners in the nuclear industry enable a realistic and controlled approach to the main sources of indirect emissions.



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Climate transition investments are integrated into the Group's multiannual investment plan and are linked to:

- engineering upgrades to Cernavoda NPP;
- industrial upgrades in Pitesti NFP and FPCU Feldioara;
- investments in digitalisation, ancillary infrastructure and energy efficiency;
- investments related to the project of Units 3 and 4;
- investments related to development of the SMR Programme.

Over the period 2025-2035, the investments in major nuclear projects will be the main financial vector of the transition.

For 2025, the investments related to transition are estimated at RON 850,276,741, as CAPEX related to development of reactors 3 and 4, and RON 1,575,756,325, as CAPEX related to production of electricity from nuclear sources.

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## SNN Group Climate change



### Climate change mitigation and adaptation-related policies | *ESRS E1-2*



The SNN Group's ESG policy, which covers the entities Cernavoda NPP, Pitesti NFP, Feldioara FPCU and SNN Headquarters, reflects the Group's commitment to streamline sustainability in all its activities. The policy emphasises priorities such as reduce environmental impacts, produce clean nuclear energy, protect the employees' health and safety, support the communities, and promote transparent corporate governance. The SNN Group aims to contribute to the transition to a green economy by complying with the environmental legislation and implementing ethical standards, constantly monitoring its ESG performance and reporting on the progress to stakeholders.

Main environmental objectives and priorities of the ESG Policy:

- Development of investment projects which will double the production of clean energy by 2030/2031: Project Units 3 & 4; Refurbishment of Unit 1;
- Development of small modular reactors (SMR)
- Reduction of the energy use
- Commitment to management for monitoring the environmental footprint
- Carbon emissions and their intensity
- Radioactive waste

Thus, the ESG policy concerns the material impacts, risks and opportunities, as these are identified and described in the sub-chapter *"Material impacts, risks and opportunities and their interaction with strategy and business model"* (IRO-1).

The positive impact, related to climate change mitigation and production of energy with zero direct GHG emissions, is

applicable only for Cernavoda NPP, which is the main activity of the plant. The opportunity related to Efficient operation of SNN facilities, with investments in new production capacities for energy security and nuclear safety of its operations is targeted by the ESG Policy.

We rate the environmental, social and governance metrics as material by reference to different categories of stakeholders having the ability to impact the Company's contribution at internal, external (society) and environmental level. We consult our stakeholders in order to assess, quantify and introduce ESG indicators that give value and reflect the Company's activities and projects, but simultaneously support the stakeholders' interest in short, medium and long – term development.

The nuclear field is regulated and controlled always under the careful supervision of NGOs, control authorities and the public. For this reason, SNN Group has always been motivated and committed to adopt the latest industry standards, and prove its care for the environment and the public.

The most relevant categories of stakeholders who have contributed to implementation of the ESG Policy are: The Government, the Parliament, central and local authorities, regulatory and control authorities, business partners (energy customers, energy transporters, consumers), NGOs, the local community and the general public, as well as external organisations (WANO, INPO, etc.).

The ESG policy aligns with the WANO, INPO, United Nations Global Compact and 24/7 Carbon Free Energy



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Compact standards. It is available to all stakeholders and can be accessed at company website. ■

The ESG policy generally addresses the topics of climate change mitigation and adaptation, energy efficiency and use of renewable energy, as well as other matters related to nuclear safety or in the social and governance areas. As described above, the SNN Group's ESG Policy addresses the impacts, risks and opportunities that have also been identified through the double materiality assessment.

At SNN Group level, a Climate Change Policy has been implemented internally and is applicable to all Group entities. The main objectives of the Climate Change Policy are:

- **Reducing emissions:** Continuously decrease carbon footprint by optimising the operational processes and implementing advanced green technologies.
- **Energy efficiency:** Improve energy efficiency in all the Company's operations, while reducing resources consumption and the related emissions.
- **Nuclear Energy Development:** Expand the nuclear capacity by completing Units 3 and 4 at Cernavoda and deploying the Small Modular Reactors (SMRs), thereby contributing to a low-carbon energy mix.
- **Climate change adaptation:** Identify and manage the risks attached to climate change on the Company's operations and infrastructure.

This policy addressed the material or very likely to occur risks by geographical area (Cernavoda, Mioveni or Feldioara or Bucharest), and identified adaptation measures for each of these risks. Thus, the Climate

Change Policy's objectives targets the material impacts, risks and opportunities and the areas of climate change mitigation, climate change adaptation, energy efficiency or use of renewable energy.

The Climate Change Policy aims to engage the employees through training on best practices in climate change adaptation and energy efficiency management, and the local community through public awareness and education campaigns on the role of nuclear power generation in addressing climate change. Partnerships and collaborations with Governmental Authorities and International Organisations are also envisaged in order to align the Company's policies with the national and international strategies on climate change adaptation and mitigation, as well as to participate in global initiatives and exchange of best practices in the field of nuclear power generation and climate resilience.

The ESG Committee is tasked with implementation of the ESG Policy and the Climate Change Policy.



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## SNN Group Climate change



Actions and resources  
related to the climate  
change policies  
| *ESRS E1-3*



In line with the abovementioned policies, the SNN Group has implemented, carried out and/or pipelined the following actions

Objective	Action
<b>Development of investment projects which will double the production of clean energy by 2030/2031: Project Units 3 &amp; 4;</b>	The Project Implementation in 3 stages: kick-off, preliminary works, and commencement of the construction works, with start of operation for Unit 3 in 2030 and for Unit 4 in 2031.
<b>Refurbishment of Unit 1;</b>	After a refurbishment process, the lifetime of Unit 1 may be extended by another 30 years. Certain long-lead reactor components to be replaced have to be procured. Also, the condition of the set of specialised tools to be used to replace the reactor components has to be checked, and the components that require replacement or modification have to be procured. The final phase of the project features the shutdown of Unit 1 and consists in the effective performance of the refurbishment works in Unit 1's installations and its return to operation for commercial operation over a new operating cycle of 30 years, after 2029.
<b>Development of small modular reactors (SMR)</b>	Development of a NuScale power plant with 6 x 462 Mwe modules on the site of the former coal-fired plant.
<b>Reduction of the energy use</b>	<p>The WoL Energy Wasting Reduction Project, deployed in Cernavoda NPP and Pitesti NFP, provides for application of technical solutions with the aim of reducing the unnecessary consumption for IT infrastructure equipment:</p> <ul style="list-style-type: none"> <li>- Creating OUs on servers for equipment management</li> <li>- Creation of policies and connections on servers, for ordering equipment</li> <li>- Equipment configuration by category: Workstation, Desktop, AIO</li> <li>- Development of a WoL packet messaging server for the data network.</li> <li>- Generating WoL messages to the stations in the OU.</li> <li>- Configuration of Safety equipment for VPN traffic management</li> <li>- Efficiency in workstation operation (reduced turn-on mode, in sleep, waiting for the WoL message to switch to Power On).</li> </ul> <p>Energy Audits: Performance of regular audits to identify energy saving opportunities. Infrastructure Upgrading: Investments in green and energy efficient equipment and technologies</p>
<b>Carbon emissions and their intensity</b>	<p>Process Optimisation: Implementation of environmentally-sound technologies and practices to help reduce emissions at all stages of the nuclear energy lifecycle.</p> <p>Renewable Sources: Integration of renewable sources in the Company's energy mix, where feasible.</p>
<b>Climate change adaptation</b>	<p>Risk assessment: Analysis of the infrastructure vulnerabilities to extreme climatic events.</p> <p>Contingency plans: Development of plans to ensure business continuity in adverse weather conditions.</p>



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These actions mainly cover the SNN Group's own operations, over an estimated timeframe up to 2030/31.

Through the development of the nuclear program (refurbishment of Unit 1, Units 3 and 4 and the development of small modular reactors), Romania will double the amount of energy from nuclear sources, from 18 – 20% at present, up to 36% by 2030/31 (taking into account an increase of 2.1% in usage estimated by the IEA).

Currently, SNN Group plays a strategic part at the national level, with 2 nuclear units operating at the highest safety and productivity standards, and covering:	After completion of the strategic projects, this will increase significantly, helping the national energy system attain energy stability and security by clean energy:
- Approximately 20% of the total energy demand and 33% of the total CO <sub>2</sub> – free clean energy production.	- 36% clean energy of the total domestic production, 66% clean energy contribution
- 205 million tonnes of CO <sub>2</sub> avoided from commissioning, - 10 million tonnes of CO <sub>2</sub> avoided every year	- 24 million tonnes of CO <sub>2</sub> avoided every year
- More than 3,000 direct jobs, and more than 11,000 jobs generated by the industry	- Over 20,000 jobs
- EUR 5.7 billion contributed to the industry's GDP, an amount that could keep all Romanian hospitals operating at excellence standards for one full year	

The NuScale plant will also provide a range of social and economic benefits.

Social benefits	Benefits for the environment
- Generating 193 permanent jobs, 1.500 jobs during the construction period, 2.300 jobs in manufacturing.	- Clean source of energy, without CO <sub>2</sub> emissions. A NUScale power plant with 6 modules will avoid the release of 4 million tonnes CO <sub>2</sub> per year into the atmosphere.
- Revitalisation of the site of the former powerplant (the plant of Doicești) and creation of local jobs in the energy industry	- Being built on the sites of the former coal-fired powerplants, its footprint and environmental impact will be minor.
- Tax income for local communities	- Reduced water consumption
- Projects for the local economy and industry	- They produce clean hydrogen.

The new innovative technology will attract a new generation to the nuclear industry and develop the education system in the long term. The Polytechnic University will benefit from a control room simulator of a NuScale SMR – the only one in Europe.

The NuScale simulator will be installed at the Politehnica University of Bucharest to support the development of the workforce capacity of the next generation of experts, technologists and nuclear operators in Romania. Being the first simulator of a control room of a small modular reactor in Europe and the fourth in the world, this collaboration underlines the interest that Romanian universities, in partnership with SNN Group, have in training the workforce that will make clean energy solutions of the future.

**The significant monetary values of CapEx and OpEx required to implement the actions undertaken or planned.**



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## SNN Group Climate change



### Targets related to climate change mitigation and adaptation | *ESRS E1-4*



The SNN Group's climate strategy aims to develop policies and targets to address identified impacts, risks and opportunities related to climate change mitigation and adaptation. In 2025 a strategy was developed with targets against this reference year and for 2024 targets have been estimated for 5 of the 6 entities included in the report. In view of future refurbishment projects, an increase in the consumption of resources and emissions produced by the company is estimated. After 2030, emissions are projected to become lower, but the targets will need to be reviewed and updated in the coming years. Scope 1 emissions will be limited to the Company's secondary activities, if any, given that the core business (electricity generation) has zero direct emissions, as for the Scope 2 emissions from Cernavoda NPP.

At present, the targets set are in the form of estimates. As production expands, emissions will inevitably rise. Also, due to the nature of EnergoNuclear, it is difficult to set targets beyond 2030. After this year, emissions should become lower. Estimates and updates on these scenarios will be made in the following sustainability reports. No

decarbonisation levers have been identified or specific actions planned on the basis of a decarbonisation strategy. Also, the targets set at this stage are not compatible with climate scenarios limiting global warming to 1.5°C.

The GHG reduction targets presented aim to reduce the negative impacts related to generation of GHG emissions and the energy consumption of the SNN Group. As regards generation of zero direct GHG emissions from the core business activity, the refurbishment of Units 3 and 4 will lead to commissioning of 2 units of minimum 724 MWe, whereas the Small Modular Reactors (SMR) programme envisages development of a power generation capacity in a small modular reactor nuclear powerplant. This investment consists of completion and commissioning of six NuScale Power Module NPM™ modular units on the site of the former Doicești thermal power plant, with a gross installed power of 462 MWe (6 x 77 MWe).



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Cernavoda NPP	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Absolute value of GHG emission reduction (by site)	tCO <sub>2</sub> equivalent	43,394.34	746,951.88	45,690.194	39,926.794	37,189.620
Absolute value of GHG emission reduction (market-based)	tCO <sub>2</sub> equivalent	43,928.96	747,575.005	46,313.319	40,549.919	38,519.332
GHG emission reduction percentage of the emissions of a base year (by site)	percentage	n/a	+1,621.31%	+6.72%	-7.99%	-14.29%
GHG emission reduction percentage of the emissions of a base year (market-based)	percentage	n/a	+1,601.78%	+5.42%	-7.69%	-12.31%
Absolute value of GHG emission reduction – Scope 1	tCO <sub>2</sub> equivalent	3,621.06	6,694	4,694	4,694	4,694
GHG emission reduction percentage – Scope 1 of the emissions of a base year	percentage	n/a	+84.86%	+29.63%	+29.63%	+29.63%
Absolute value of GHG emission reduction – Scope 2 <b>by site</b>	tCO <sub>2</sub> equivalent	153.45	83.07	83.07	83.07	83.07
GHG emission reduction percentage – Scope 2 by site of the emissions of a base year	percentage	n/a	-45.86%	-45.86%	-45.86%	-45.86%
Absolute value of GHG emission reduction – <b>market-based</b> Scope 2	tCO <sub>2</sub> equivalent	688.07	706.19	706.19	706.19	706.19
GHG emission reduction percentage – market-based Scope 2 of the emissions of a base year	percentage	n/a	+2.63%	+2.63%	+2.63%	+2.63%
Absolute value of GHG emission reduction – <b>Scope 3</b> by site	tCO <sub>2</sub> equivalent	40,072.52	740,174.80	40,913.12	35,149.72	33,119.13
GHG emission reduction percentage – Scope 3 by site of the emissions of a base year	percentage	n/a	+1,747.08%	+2.09%	-12.28%	-17.35%
Absolute value of GHG emission reduction – market-based <b>Scope 3</b>	tCO <sub>2</sub> equivalent	40,129.43	740,174.80	40,913.12	35,149.72	33,119.13
GHG emission reduction percentage – Scope 3 (market-based) of the emissions of a base year	percentage	n/a	+1,744.46%	+1.95%	-12.40%	-17.46%



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Pitesti NFP	MU	Base year2023*	Target for 2030	Target for 2035	...	Target by 2050	Production scenarios
Absolute value of GHG emission reduction (by site)	tCO <sub>2</sub> equivalent	63,143.996	32,271.13	32,225.27	32,129.07	32,093.7	Scenario 1
			32,672.21	32,626.35	32,530.15	33,977.51	Scenario 2
Absolute value of GHG emission reduction (market-based)	tCO <sub>2</sub> equivalent	63,597.979	32,271.13	32,225.27	32,129.07	32,093.7	Scenario 1
			32,672.21	32,626.35	32,530.15	33,977.51	Scenario 2
GHG emission reduction percentage of the emissions of a base year (by site)	percentage	n/a	-48.89%	-48.96%	-49.11%	-49.17%	Scenario 1
			-48.25%	-48.33%	-48.48%	-46.19%	Scenario 2
GHG emission reduction percentage of the emissions of a base year (market-based)	percentage	n/a	-49.25%	-49.32%	-49.48%	49.53%	Scenario 1
			-48.62%	-48.69%	-48.85%	-46.57%	Scenario 2
Absolute value of GHG emission reduction – Scope 1	tCO <sub>2</sub> equivalent	152.497	90	65	25	15	Scenario 1
			90	75	35	20	Scenario 2
GHG emission reduction percentage – Scope 1 of the emissions of a base year	percentage	n/a	-40.98%	-57.37%	-83.60%	-90.16%	Scenario 1
			-40.98%	-50.81%	-77.04%	-86.88%	Scenario 2
Absolute value of GHG emission reduction – Scope 2 by site	tCO <sub>2</sub> equivalent	671.28	734.37	734.37	734.37	734.37	Scenario 1
			734.37	928.35	928.35	928.35	Scenario 2
GHG emission reduction percentage – Scope 2 by site of the emissions of a base year	percentage	n/a	+9.39%	+9.39%	+9.39%	+9.39%	Scenario 1
			+9.39%	+38.29%	+38.29%	+38.29%	Scenario 2
Absolute value of GHG emission reduction – market-based Scope 2	tCO <sub>2</sub> equivalent	1,081.58	1,183.23	1,183.23	1,183.23	1,183.23	Scenario 1
			1,183.23	1,495.78	1,495.78	1,495.78	Scenario 2
GHG emission reduction percentage – market-based Scope 2 of the emissions of a base year	percentage	n/a	+9.39%	+9.39%	+9.39%	+9.39%	Scenario 1
			+9.39%	+38.29%	+38.29%	+38.29%	Scenario 2
Absolute value of GHG emission reduction – Scope 3 by site	tCO <sub>2</sub> equivalent	62,320.219	31,475.76	31,442.9	31,368.7	31,352.33	Scenario 1
			32,672.21	32,626.35	32,530.15	33,977.51	Scenario 2
GHG emission reduction percentage – Scope 3 by site of the emissions of a base year	percentage	n/a	-49.49%	-49.54%	-49.66%	-49.69%	Scenario 1
			-47.67%	-47.64%	-47.80%	-45.47%	Scenario 2
Absolute value of GHG emission reduction – market-based Scope 3	tCO <sub>2</sub> equivalent	62,363.898	31,427.98	31,395.12	31,320.92	31,304.54	Scenario 1
			32,672.21	32,626.35	32,530.15	33,977.51	Scenario 2
GHG emission reduction percentage – Scope 3 (market-based) of the emissions of a base year	percentage	n/a	-49.60%	-49.65%	-49.77%	-49.80%	Scenario 1
			-47.61%	-47.68%	-47.83%	-45.51%	Scenario 2



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SNN Headquarters	MU	Base year 2023*	Target for 2025	Target for 2030	Target by 2050	Comments
Absolute value of GHG emission reduction (by site)	tCO <sub>2</sub> equivalent	1,158.82	325.76	314.36	323.68	Without estimates from categories 1, 3 and 7 of Scope 3.
Absolute value of GHG emission reduction (market-based)	tCO <sub>2</sub> equivalent	1,225.14	325.76	314.36	323.68	
GHG emission reduction percentage of the emissions of a base year (by site)	percentage	n/a	-71.88%	-72.87%	-72.06%	
GHG emission reduction percentage of the emissions of a base year (market-based)	percentage	n/a	-73.14%	-74.34%	-73.58%	
Absolute value of GHG emission reduction – Scope 1	tCO <sub>2</sub> equivalent	77.47	101.01	103.82	100.40	
GHG emission reduction percentage – Scope 1 of the emissions of a base year	percentage	n/a	+30.38%	+34.01	+29.59%	
Absolute value of GHG emission reduction – Scope 2 by site	tCO <sub>2</sub> equivalent	32.676	75.000	54.275	60.500	
GHG emission reduction percentage – Scope 2 by site of the emissions of a base year	percentage	n/a	+129.52%	+66.10%	85.15%	
Absolute value of GHG emission reduction – market-based Scope 2	tCO <sub>2</sub> equivalent	99.078	75.000	54.275	60.500	
GHG emission reduction percentage – market-based Scope 2 of the emissions of a base year	percentage	n/a	-24.30%	-45.21%	-38.93%	
Absolute value of GHG emission reduction – Scope 3 by site	tCO <sub>2</sub> equivalent	1,048.67	149.75	156.26	162.78	Without estimates from categories 1, 3 and 7 of Scope 3.
GHG emission reduction percentage – Scope 3 by site of the emissions of a base year	percentage	n/a	-85.72%	-85.09%	-84.47%	
Absolute value of GHG emission reduction – market-based Scope 3	tCO <sub>2</sub> equivalent	1,048.59	149.75	156.26	162.78	Without estimates from categories 1, 3 and 7 of Scope 3.
GHG emission reduction percentage – Scope 3 (market-based) of the emissions of a base year	percentage	n/a	-85.71%	-85.09%	-84.47%	



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FPCU Feldioara	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Absolute value of GHG emission reduction (by site)	tCO <sub>2</sub> equivalent	2,192.30	2,950.1	2,930.95	2,884.65	2,859.5
GHG emission reduction percentage of the emissions of a base year (by site)	percentage	n/a	+34.56%	+33.69%	+31.58%	+30.43%
Absolute value of GHG emission reduction – Scope 1	tCO <sub>2</sub> equivalent	2,191.11	2,949.05	2,928.95	2,883.75	2,858.65
GHG emission reduction percentage – Scope 1 of the emissions of a base year	percentage	n/a	+34.59%	+33.67%	+31.61%	+30.46%
Absolute value of GHG emission reduction – Scope 2 <b>by site</b>	tCO <sub>2</sub> equivalent	1.19	1.05	1	0.9	0.85
GHG emission reduction percentage – Scope 2 by site of the emissions of a base year	percentage	n/a	-11.76%	-15.96%	-24.36%	-28.57%



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Energionuclear	MU	Base year 2023*	Target for 2030	Target for 2035
Absolute value of GHG emission reduction	tCO <sub>2</sub> equivalent	375.39	465.61	487.72
GHG emission reduction percentage of the emissions of a base year	tCO <sub>2</sub> equivalent	n/a	+24.0%	+29.9%
Absolute value of GHG emission reduction – Scope 1	tCO <sub>2</sub> equivalent	40.87	80.69	89.93
GHG emission reduction percentage – Scope 1 of the emissions of a base year	percentage	n/a	+97.4%	+120%
Absolute value of GHG emission reduction – Scope 2 <b>by site</b>	tCO <sub>2</sub> equivalent	11.67	20.38	21.85
GHG emission reduction percentage – Scope 2 by site of the emissions of a base year	percentage	n/a	+74.7%	+87.3%
Absolute value of GHG emission reduction – <b>market-based</b> Scope 2	tCO <sub>2</sub> equivalent	7.78	16.63	18.42
GHG emission reduction percentage – market-based Scope 2 of the emissions of a base year	percentage	n/a	+113.8%	+136.8%
Absolute value of GHG emission reduction – <b>Scope 3</b> by site	tCO <sub>2</sub> equivalent	326.74	368.29	379.37
GHG emission reduction percentage – Scope 3 by site of the emissions of a base year	percentage	n/a	+12.7%	+16.1%
Intensity of GHG emission reduction – Scope 3 by site	decimal	0	0.00162	0.00167
Absolute value of GHG emission reduction – market-based <b>Scope 3</b>	tCO <sub>2</sub> equivalent	326.74	368.29	379.37
GHG emission reduction percentage – Scope 3 (market-based) of the emissions of a base year	percentage	n/a	+12.7%	+16.1%
Value of GHG emission reduction intensity – market-based Scope 3	decimal	0	0.00162	0.00167



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Based on EnergoNuclear's ESG report for 2023 (section 2.1), targets have been set according to 3 scenarios concerning the evolution of EN's organisational chart. The targets will be updated in line with the new organisational chart approved by EN's Board of Directors.

The GHG emission reduction targets have been set in accordance with the Neutral Romania in 2050 scenario, related to Romania's long – term strategy for reducing greenhouse gas emissions, presented in the ESG report EN 2023 (section 2.1).

Expansion of the nuclear capacity with two new CANDU 6 units in Romania, EN shall contribute with:

- Approximately 30 % clean energy contribution;
- Approximately 10 million tonnes of CO2 avoided annually.

**Targets estimated for NuclearelectricaServ**

GHG emission reduction targets are as follows:

- 10% by 2030
- 50% by 2035.

The targets for reducing GHG emissions from cars and machinery (car fleet) will be achieved through a gradual transition to electric vehicles.

The targets have been set by each GHG emission category and for each subsidiary in the previous tables and are aligned with Scopes 1, 2 and 3, as calculated for reporting, as seen in E1-6. The targets have been estimated after the 2023 sustainability report, taking into account future investment projects due to increase the production capacity, but also the GHG emissions.

At this time, the set targets are only estimates, and are not compatible with the climate scenarios limiting global warming to 1.5°C. No decarbonisation levers have been envisaged so far and no quantitative contributions have been estimated to reach the GHG emission reduction targets.

Emissions intensity by Scopes was presented under the Chapter "Gross GHG emissions in Scopes 1, 2 and 3, and total GHG emissions", E1-6.

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### Energy consumption and energy mix | ESRS E1-5



Energy consumption and energy mix	Cernavoda NPP (2025)	Pitesti NFP (2025)	EnergoNuclear (2025)	FPCU Feldioara (2025)	SNN Headquarters (2025)	Nuclearelectrica Serv (2025)	Total 2025
(1) Consumption of fuel from coal and coal products (MWh)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(2) Consumption of fuel from crude oil and petroleum products (MWh)	4,561.38	227.62	22.09	198.30	228.66	147.25	5,385.30
(3) Consumption of fuel from natural gas (MWh)	0.00	43.27	293.34	12,178.88	515.53	0.00	13,031.02
(4) Consumption of fuel from other fossil sources (MWh)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(5) Consumption of electricity, heat, steam and coolant purchased or obtained from fossil sources (MWh)	25.70	1,296.05	23.52	39.62	337.62	0.00	1,722.51
(6) Total fossil energy consumption (MWh) (calculated as sum of rows 1 – 5)	4,587.08	1,566.94	338.94	12,416.80	1,081.81	147.25	20,138.82
Share of fossil sources in total energy consumption (%)	58.39%	32.43%	85.12%	71.13%	85.12%	100%	63.01%
(7) Consumption from nuclear sources (MWh)	16.80	1,191.62	21.63	25.90	32.34	0.00	1,288.29
Share of consumption from nuclear sources in total energy consumption (%)	0.21%	24.66%	5.43%	0.15%	2.54%	0.00%	4.03%
(8) Consumption from renewable fuel, including biomass (including industrial and municipal biowaste, biogas, renewable hydrogen, etc.) (MWh)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(9) Consumption of electricity, heat, steam and coolant purchased or obtained from renewable sources (MWh)	3,252.23	2,072.67	37.61	5,013.33	156.76	0.00	10,532.61
(10) Consumption of renewable energy, other than in – house produced fuels (MWh)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(11) Total renewable energy consumption (MWh) (calculated as sum of rows 8 – 10)	3,252.23	2,072.67	37.61	5,013.33	156.76	0.00	10,532.61
Share of renewables in total energy consumption (%)	41.40%	42.90%	9.45%	28.72%	12.33%	0.00%	32.96%
Total energy consumption (MWh) (calculated as sum of rows 6 and 11)	7,856.11	4,831.23	398.18	17,456.03	1,270.91	147.25	31,959.72



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Energy consumption and energy mix	Cernavoda NPP (2024)	Pitesti NFP (2024)	EnergONuclear (2024)	FPCU Feldioara (2024)	SNN Headquarters (2024)	Nuclearelectrica Serv (2024)	Total 2024
(1) Consumption of fuel from coal and coal products (MWh)	0	0	0	0	0	0	0
(2) Consumption of fuel from crude oil and petroleum products (MWh)	4,380.87	227.45	20.31	203.25	241.45	116.72	5,190.04
(3) Consumption of fuel from natural gas (MWh)	0	39.24	162.71	14,476.48	424.07	0	15,102.50
(4) Consumption of fuel from other fossil sources (MWh)	0	0	0	0	0	0	0
(5) Consumption of electricity, heat, steam and coolant purchased or obtained from fossil sources (MWh)	139.34	1881.78	16.72	12.96	183.56	0	2,234.35
(6) Total fossil energy consumption (MWh) (calculated as sum of rows 1 – 5)	<b>4,520.21</b>	<b>2148.47</b>	<b>199.74</b>	<b>14692.69</b>	<b>849.09</b>	<b>116.72</b>	<b>22,526.90</b>
Share of fossil sources in total energy consumption (%)	53.3%	41.9%	87.3%	71.4%	73.3%	100.0%	-
(7) Consumption from nuclear sources (MWh)	594.75	1514.37	7.44	844.45	53.42	0	3,014.43
Share of consumption from nuclear sources in total energy consumption (%)	7.01%	29.50%	3.24%	4.11%	4.61%	0	-
(8) Consumption from renewable fuel, including biomass (including industrial and municipal biowaste, biogas, renewable hydrogen, etc.) (MWh)	0	0	0	0	0	0	0
(9) Consumption of electricity, heat, steam and coolant purchased or obtained from renewable sources (MWh)	3,366.70	1,470.09	21.75	5,031.39	256.40	0	10,146.33
(10) Consumption of renewable energy, other than in – house produced fuels (MWh)	0	0	0	0	0	0	0
(11) Total renewable energy consumption (MWh) (calculated as sum of rows 8 – 10)	3,366.70	1,470.09	21.75	5,031.39	256.40	0	10,146.33
Share of renewables in total energy consumption (%)	39.69%	29%	9%	24.46%	22.13%	0	-
Total energy consumption (MWh) (calculated as sum of rows 6 and 11)	8,481.66	5,132.93	228.92	20,568.53	1,158.84	116.72	35,687.60

Nuclear energy production in 2025: 11,012,353

In 2025, a total consumption of 31,959.72 MWh was recorded, and the energy intensity in relation to net income of 5,819,766,440 was 0.00000549158 MWh/RON. (In 2024, the SNN Group recorded a total consumption of 35,687.60 MWh, and the energy intensity in relation to net income of RON 4,682,930,752 was 7.62078E – 06 MWh/RON or 0.00000762078 MWh/RON.)

GHG energy per net income	2024	2025	%
Total energy consumption from activities in high-impact climate sectors per net income from activities in high-impact climate sectors (MWh/monetary unit)	0.00000762078 MWh/RON	0.00000549158 MWh/RON	-27.93%

At SNN Group level, there no net income is earned from activities in economic sectors with a high climate impact.

Net income from activities in sectors with a high impact on climate, used to calculate energy intensity	N/A
Net income (other)	N/A
Total net income (financial statements)	N/A



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Gross GHG emissions in  
Scopes 1, 2 and 3, and  
total GHG emissions  
| ESRS E1-6



SNN Group	Retrospectively			
	2025	2024	2023	% N / N - 1
Gross GHG emissions – Scope 1 (tCO <sub>2</sub> equivalent)	5,406.09	4,863.026	3,851.040	+11%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	19.57%	19.54%	0%	+0.03%
Gross GHG emissions – Scope 2 by site (tCO <sub>2</sub> equivalent)	2,434.02	2,651.18	857.41	-8%
Gross GHG emissions – market-based Scope 2 (tCO <sub>2</sub> equivalent)	839.14	1,469.02	1,868.73	-43%
Gross GHG emissions – <b>Scope 3</b> (tCO <sub>2</sub> equivalent)	92,262.44	239,836.15	103,441.41	-62%
1 Purchased goods and services	41,304.76	233,516.66	95,760.42	-82%
<i>(Optional sub-category: Cloud computing and data services)</i>	-	-	-	
2 Capital goods	47,827.012	3,729.25	3,229.78	+1,182%
3 Fuel and energy-related activities Activities (not included in Scope 1 or Scope 2)	1,644.74	771.29	889.49	+113%
4 Upstream transportation and distribution	34.83	29.51	376.18	+18%
5 Waste generated in operations	126.06	108.04	647.79	+17%
6 Business traveling	576.29	866.62	1,644	-34%
7 Employee commuting	748.73	814.76	893.73	-8%
8 Upstream leased assets	-	-	-	-
9 Downstream transportation	-	-	-	-
10 Processing of sold products	-	-	-	-
11 Use of sold products	-	-	-	-
12 End-of-life treatment of sold products	-	-	-	-
13 Downstream leased assets	-	-	-	-
14 Franchises	-	-	-	-
15 Investments	-	-	-	-
Total GHG emissions (by site) (tCO <sub>2</sub> equivalent)	100,102.55	247,350.37	108,149.87	-60%
Total GHG emissions (market-based) (tCO <sub>2</sub> equivalent)	98,507.67	246,168.21	109,161.19	-60%



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Cernavoda NPP	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
Gross GHG emissions – Scope 1 (tCO <sub>2</sub> equivalent)	3,621.06	3,622	2,544.12	6,694	4,694	-30%	The estimated increase for 2030 is due to technological and commissioning tests of SDG and EPS after U1 refurbishment, SDG and EPS related to U3 – U4 and annual SDG and EPS tests for U2 The estimated value for 2035 decreases compared to 2030 but is higher than the reference year. This results from the mandatory periodic tests related to SDG – EPS U1, U2, U3, U4, CTP, CTRF, Diesel CCUA – U5 and diesel in the access control points The value for 2040 is increasing compared to 2035, given the SDG – EPS U2 testing after refurbishment and testing on EU – ETS U1, U3, U4 installations
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	n/a	n/a	n/a	n/a	n/a	n/a	
Gross GHG emissions – Scope 2 by site (tCO <sub>2</sub> equivalent)	688.07	706.19	592.13	706.19	706.19	-14%	-
Gross GHG emissions – market-based Scope 2 (tCO <sub>2</sub> equivalent)	153.46	83.07	14.27	83.07	83.07	-91%	-
Gross GHG emissions – <b>Scope 3</b> (tCO <sub>2</sub> equivalent)	40,072.53	725,922.94	76,492.37	740,174.80	33,119.13	+91%	-
1 Purchased goods and services	34,119.49	68,922.00	29,904.93	81,887.00	29,002.00	-12%	Reduction 2045 – 2050: expected reduction compared to the 2023 level due to improved efficiency of preventive maintenance programmes and use of more reliable equipment



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Cernavoda NPP	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
<i>(Optional sub-category: Cloud computing and data services)</i>	-	-	-	-	-	-	-
2 Capital goods	3,229.782	654,646.00	45,158.61	654,646.00	646.00	+1,298%	2030 – 2035 Target – return to 2023 emissions – completion of refurbishment and investment projects carried out 2025 – 2030 200% increase 2035 – 2040: emission increase factors – contracting – preparation of U2 refurbishment and realisation of U2 refurbishment (existing infrastructure RT – U1) 70% reduction 2040 – 2045: expected reduction compared to the reference year 2023 due to the U1/U2 refurbishment which foresees a decrease in the needs for goods and services of the refurbished units and includes also the U3 – U4 operation 80% reduction 2045 – 2050: expected reduction compared to the 2023 baseline level due to improved efficiency of preventive maintenance programmes and use of more reliable equipment
3 Fuel and energy-related activities Activities (not included in Scope 1 or Scope 2)	n/a	n/a	n/a	n/a	n/a	n/a	-
4 Upstream transportation and distribution	n/a	n/a	n/a	n/a	n/a	n/a	-
5 Waste generated in operations	155.93	171.52	36.75	233.89	124.74	-76%	-
6 Business traveling	Targets set per travel category below						
Accommodation	70.33	77.43	21.24	70.40	66.88	-70%	In 2030, the target is to return to the 2023 baseline, which is the year in which, according to the schedule, U1 will enter a new operating cycle (LTO) and the staff employed will have their external training completed. In 2050, the number of accommodation days for business trips will decrease (by around 5% by 2050 and by 1% per year) by optimising activities that require staff to travel for long periods.



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Cernavoda NPP	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
Business trips (air travel + others)	532.40	585.56	281.70	532.33	505.71	-47%	-
7 Employee commuting	1,511.88	1,520.43					<p>Considerations for evaluating the variation of the targets taking into account the forecast included in the strategy document “Cernavoda – 4 Candu Doicesti – 6 SMR units of 77 MW Nuscale” approved by the Management in 2023 according to which, the following were estimated:</p> <ul style="list-style-type: none"> <li>- In 2023 Cernavoda NPP had a total of 1,750 own employees for which emissions of 1,511.88 tCO<sub>2</sub>e were calculated.</li> <li>- By 2030, for the U3 – U4 units on the Cernavoda NPP site, it is expected to employ a total of 1,191 employees, which will increase CO<sub>2</sub>e emissions by 68.06% compared to the baseline year 2023;</li> <li>- Taking into account that the total staff of U1+U2+U3+U4 will be 3,247 employees in 2030 for which the operator of the nuclear units will provide transportation or will travel by their own means of transport, the increase in emissions compared to the baseline year will be 85.54%, i.e. it will reach 2,805.18 tCO<sub>2</sub>e;</li> <li>- Between 2025 – 2030, Cernavoda NPP will replace its own fleet of cars with electric and/or hybrid ones, which will lead to a reduction of emissions from cars used in the baseline year 2023. Similarly, it is expected that Cernavoda NPP employees will purchase less polluting cars. However, in relation to the growth estimated by the evolution of the number of commuting staff where the share of emissions is mainly due to the service providers that own coaches for commuting staff (Constanta, Medgidia, Fetesti, Cernavoda), the reduction of emissions through the purchase of such cars does not significantly amend the expected increase in emissions by 85.54%;</li> </ul> <p>Between 2030 – 2035, emissions are projected to be reduced by:</p> <ul style="list-style-type: none"> <li>- finalising the construction of housing in Cernavoda (CAMPUS 3 Project – approx. 80 housing units) and the release of the housing units from the Campus allocated to the contractor staff (expats) with re – allocation to the staff of the operator of the 4 Units;</li> <li>- the allocation to commuting staff of the intervention or company housing available in the existing campus (according to the Commission Report based on Decision 854/10.06.2024), 277 more housing units (total amount of commuting employees potentially re – allocated in Cernavoda NPP until 2035 = 357 employees for which emissions due to transportation will be reduced by 30.84 tCO<sub>2</sub>e, i.e. 1.099%)</li> </ul> <p>In the period 2035 – 2040, the U2 refurbishment will be prepared and carried out, which will mean that the conditions are not adequate to expect a reduction in emissions, due to the additional contractor personnel for which Cernavoda NPP will provide transportation. Offsetting this, it is estimated to improve the quality of the vehicle fleet with a representative number of hybrid or electric vehicles, which leads us to assume that emissions will be maintained at the level in 2035;</p> <p>In the absence of a long term strategy for the use of electric commuter coaches, it is not realistic to estimate emission reductions after 2040.</p>



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Cernavoda NPP	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
8 Upstream leased assets	n/a	n/a	-	-	-	-	-
9 Downstream transportation	n/a	n/a	-	-	-	-	-
10 Processing of sold products	n/a	n/a	-	-	-	-	-
11 Use of sold products	n/a	n/a	-	-	-	-	-
12 End-of-life treatment of sold products	n/a	n/a	-	-	-	-	-
13 Downstream leased assets	n/a	n/a	-	-	-	-	-
14 Franchises	n/a	n/a	-	-	-	-	-
15 Investments	n/a	n/a	-	-	-	-	-
Total GHG emissions (by site) (tCO <sub>2</sub> equivalent)	43,847.051	729,628.01	79,628.61	746,951.88	37,189.20	+82%	-
Total GHG emissions (market-based) (tCO <sub>2</sub> equivalent)	44,438.585	730,251.14	79,050.76	747,575.00	38,518.33	+78%	-



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Pitesti NFP	Base year	2025		Milestones and target years			Scenario 1 – 11000 Scenario 2 – 22000	Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year		
Gross GHG emissions – Scope 1 (tCO <sub>2</sub> equivalent)	152.20	120	83.75	90	15	-45%	S1	<p>The NFP plans to purchase new sintering furnaces that will use hydrogen instead of methane gas, which is used only for backup.</p> <p>In 2025, two generators will be purchased, one to supply electricity to the sintering furnaces and the second to operate the fire pump.</p> <p>Starting in 2030 the NFP plans to replace 4 diesel vehicles with hybrid vehicles and purchase an electric forklift. The financial impact is estimated at EUR 120,000 (4 vehicles) and EUR 40,000 (electric forklift).</p> <p>In case of doubling the capacity between 2030 – 2035, another generator will be purchased. At the same time, gas consumption was increased due to the commissioning of another sintering furnace.</p> <p>By 2040, the MAN tractor will be replaced by a “0” emission truck and the diesel minibus will be replaced by an electric one. The financial impact is estimated to be around EUR 150,000 for the tractor and EUR 60,000 for the purchase of a minibus.</p> <p>Between 2045 – 2050, electric cars will replace hybrids and gasoline cars. The financial impact is estimated at EUR 180,000 (6 vehicles) and EUR 30,000 (electric forklift).</p>
	152.20	120	83.75	90	20	-45%	S2	



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Pitesti NFP	Base year	2025		Milestones and target years			Scenario 1 – 11000 Scenario 2 – 22000	Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year		
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-
Gross GHG emissions – Scope 2 by site (tCO <sub>2</sub> equivalent)	671.28	692.8	819.58	734.37	734.37	+22%	S1	-
	671.28	692.8	819.58	734.37	928.35	+22%	S2	-
Gross GHG emissions – market-based Scope 2 (tCO <sub>2</sub> equivalent)	1,081.58	1,116.25	691.80	1,183.23	1,183.23	-36%	S1	-
	1,081.58	1,116.25	691.80	1,183.23	1,495.78	-36%	S2	-
Gross GHG emissions – Scope 3 (tCO <sub>2</sub> equivalent)	62,320.21	11,828.32	8,345.43	31,475.76	31,352.33	-87%	S1	-
	62,363.89	11,828.32	8,345.43	62,118.35	62,107.98	-87%	S2	-



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Pitesti NFP	Base year	2025		Milestones and target years			Scenario 1 – 11000 Scenario 2 – 22000	Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year		
1 Purchased goods and services	61,302.81	10,998	7,112.72	30,622	30,622	-88%	S1	<p>The estimate includes only purchases of raw materials (UO2 – powder and ZY products), which account for about 90% of total purchases of goods and services. The value has been estimated taking into account the normalised consumption of raw materials (UO2 powder and ZY – 4 raw materials) for a production of about 11,000 FB in 2025 and, in the case of doubling the production capacity for the period 2030 – 2050 (scenario 2) for a production of about 22,000 FB.</p> <p>In the period 2025 – 2027 in the raw material cost of UO2 powder was included only the cost of TCU processing, in this period TCU from stock will be used. For the raw material purchases in the period 2030 – 2050, the reference prices were taken as reference the prices in foreign currency from the contracts in force at that date for the purchase of ZY – 4 raw materials and TCU processing services. For the purchase of TCU the reference price was considered the price in foreign currency for the contract signed in 2022</p>
	61,302.81	10,998	7,112.72	61,243	61,243	-88%	S2	
<i>(Optional sub-category: Cloud computing and data services)</i>	-	-	-	-	-	-	-	-
2 Capital goods	-	-	-	-	-	-	-	-
3 Fuel and energy-related activities Activities (not included in Scope 1 or Scope 2)	376.32	429.5	327.36	453.98	418.6	-13%	S1	-
	376.32	384.42	327.36	453.98	528.86	-13%	S2	-



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Pitesti NFP	Base year	2025		Milestones and target years			Scenario 1 – 11000 Scenario 2 – 22000	Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year		
4 Upstream transportation and distribution	220.25	19.01	34.84	19.01	19.01	-84%	S1	-
	220.25	19.01	34.84	38.02	38.02	-84%	S2	-
5 Waste generated in operations	15.12	14.82	13.61	13.78	12.72	-10%	S1	-
	15.12	14.82	13.61	16.36	18.1	-10%	S2	-
6 Business traveling	23.77	20	38.35	20	20	+153%	S1/S2	-
7 Employee commuting	381.92	346.99	101.01	346.99	260	-74%	S1/S2	By 2035, it is estimated that 5 buses will be replaced, with a financial impact of about EUR 1,500,000 (5 buses of EUR 300,000 each) Between 2040 – 2045, it is estimated that electric buses will be purchased, with a financial impact of approximately EUR 2,500,000 (5 buses of EUR 300,000 each).
8 Upstream leased assets	-	-	-	-	-	-	-	-
9 Downstream transportation	-	-	-	-	-	-	-	-
10 Processing of sold products	-	-	-	-	-	-	-	-
11 Use of sold products	-	-	-	-	-	-	-	-
12 End-of-life treatment of sold products	-	-	-	-	-	-	-	-
13 Downstream leased assets	-	-	-	-	-	-	-	-
14 Franchises	-	-	-	-	-	-	-	-
15 Investments	-	-	-	-	-	-	-	-
Total GHG emissions (by site) (tCO <sub>2</sub> equivalent)	63,144.00	12,621.12	9,248.76	32,271.13	32,093.7	-85%	S1	-
	63,597.98	12,999.49	9,120.98	32,672.21	33,977.51	-86%	S2	-
Total GHG emissions (market-based) (tCO <sub>2</sub> equivalent)	63,144.00	12,621.12	9,248.76	32,271.13	32,093.7	-85%	S1	-
	63,597.98	12,999.49	9,120.98	32,672.21	33,977.51	-86%	S2	-



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SNN Headquarters	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
Gross GHG emissions – Scope 1 (tCO <sub>2</sub> equivalent)	77.47	101.01	160.99	103.82	100.40	+107.80%	2030 increase: The cars returned to Cernavoda NPP were eliminated from the fleet consumption and a decrease of gas consumption in Polona/Slavesti during the rehabilitation period was taken into account Target for 2050: In order to reach the mentioned target, it is necessary that half of the SNN Headquarter fleet should be hybrid cars that ensure a 25% reduction in fuel consumption. The calculation also took into account the characteristics of the buildings after the rehabilitation according to the energy performance certificates issued at the time of the design for the rehabilitation, which must be completed in 2025.
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-	-	-	-	-	-	-
Gross GHG emissions – Scope 2 by site (tCO <sub>2</sub> equivalent)	32.68	75.00	94.66	54.27	60.50	+189.65%	If the electricity supply contract is signed with a supplier other than Hidroelectrica, then the estimates for 2030 and 2050 will be higher: 78.349 tCO <sub>2</sub> in 2030 and 86.183 tCO <sub>2</sub> in 2050.
Gross GHG emissions – market-based Scope 2 tCO <sub>2</sub> equivalent)	99.08	75.00	98.51	54.27	60.50	-0.57%	
Gross GHG emissions – <b>Scope 3</b> (tCO <sub>2</sub> equivalent)	138.27	149.75	194.80	156.26	162.78	+40.88%	Target calculated only on categories 5 and 6
1 Purchased goods and services	-	-	-	-	-	-	-
<i>(Optional sub-category: Cloud computing and data services)</i>	-	-	-	-	-	-	-
2 Capital goods	-	-	-	-	-	-	-



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SNN Headquarters	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
3 Fuel and energy-related activities Activities (not included in Scope 1 or Scope 2)	-	-	-	-	-	-	-
4 Upstream transportation and distribution	-	-	-	-	-	-	-
5 Waste generated in operations	29.93	33.50	40.53	34.71	35.71	+35.41%	Increases due to the increase in rented surfaces.
6 Business traveling (by air + others)	108.34	116.02	154.27	121.55	127.07	+42.39%	Increases due to the need for external travel in order to complete major projects of SNN HQ
7 Employee commuting	-	-	-	-	-	-	-
8 Upstream leased assets	n/a	n/a	n/a	n/a	n/a	n/a	-
9 Downstream transportation	n/a	n/a	n/a	n/a	n/a	n/a	-
10 Processing of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
11 Use of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
12 End-of-life treatment of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
13 Downstream leased assets	n/a	n/a	n/a	n/a	n/a	n/a	-
14 Franchises	n/a	n/a	n/a	n/a	n/a	n/a	-
15 Investments	n/a	n/a	n/a	n/a	n/a	n/a	-
Total GHG emissions (by site) (tCO <sub>2</sub> equivalent)	43,847.051	729,628.01	79,628.61	746,951.88	37,189.20	+82%	-
Total GHG emissions (market-based) (tCO <sub>2</sub> equivalent)	44,438.585	730,251.14	79,050.76	747,575.00	38,518.33	+78%	-



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FPCU Feldioara	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
Gross GHG emissions – Scope 1 (tCO <sub>2</sub> equivalent)	2,191.11	2,979.20	2,515.98	2,949.05	2,858.65	+15%	The year 2023 is a reference year with 9 months of production and the following years with a 12 – month production plan (equivalent to 2024). The baseline value for the years 2025, 2030, 2035, 2040, 2045 and 2050 may be exceeded if the production plan is increased compared to 2024. The production quantity for the year 2023 is 242.5 tonnes UO <sub>2</sub> and for the year 2024 is 277 tonnes UO <sub>2</sub> .
Electricity “E”	1.97	3.20	912.77	3.15	2.95	+46,233.5%	The year 2023 is a reference year with 9 months of production and the following years with a 12 – month production plan (equivalent to 2024). The baseline value for the years 2025, 2030, 2035, 2040, 2045 and 2050 may be exceeded if the production plan is increased compared to 2024. The production quantity for the year 2023 is 242.5 tonnes UO <sub>2</sub> and for the year 2024 is 277 tonnes UO <sub>2</sub> .
Gas	2,159.61	2,900.00	2,466.22	2,880.00	2,800.00	+15%	The installation of new heating plants and photovoltaic panels with energy storage sources if annual FPCU investment budgets are approved.
Diesel for motor vehicles	28.69	50.00	45.46	45.00	35.00	+58%	
Diesel for generators for accidental repairs	0.13	25.00	0	20.00	20.00	-100%	In 2023 the amount of fuel consumed was realised by 13 vehicles. In the year 2024 a total of 9 vehicles were purchased, increasing the number of vehicles in the own fleet. During the years 2025 ÷ 2050, certain vehicles will be decommissioned and an attempt will be made to purchase hybrid, electric or fuel – efficient vehicles; proposals for new vehicle purchases will be included in the annual investment budgets to be submitted for approval to the sole representative of the SNN Group.
Gasoline	0.71	1.00	4.18	0.9	0.7	+488.73%	Fuel consumption has increased due to the fact that 3 generator sets (one large capacity and two medium capacity generator sets) were purchased in 2023 and commissioned in 2024. In order to maintain the generators in perfect condition, they must be switched on weekly for a minimum of 30 minutes each and for voltage drops a deviation of 1% of the total of 365 days was taken into account.
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0	0	0	0	-
Gross GHG emissions – Scope 2 by site (tCO <sub>2</sub> equivalent)	1.19	1.10	912.77	1.05	0.85	+76,603.4%	-



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FPCU Feldioara	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
Gross GHG emissions – <b>Scope 3</b> (tCO <sub>2</sub> equivalent)	n/a	n/a	n/a	n/a	n/a	n/a	-
1 Purchased goods and services	n/a	n/a	n/a	n/a	n/a	n/a	-
<i>(Optional sub-category: Cloud computing and data services)</i>	n/a	n/a	n/a	n/a	n/a	n/a	-
2 Capital goods	n/a	n/a	n/a	n/a	n/a	n/a	-
3 Fuel and energy-related activities Activities (not included in Scope 1 or Scope 2)	n/a	n/a	n/a	n/a	n/a	n/a	-
4 Upstream transportation and distribution	n/a	n/a	n/a	n/a	n/a	n/a	-
5 Waste generated in operations	n/a	n/a	n/a	n/a	n/a	n/a	-
6 Business traveling	n/a	n/a	n/a	n/a	n/a	n/a	-
7 Employee commuting	n/a	n/a	n/a	n/a	n/a	n/a	-
8 Upstream leased assets	n/a	n/a	n/a	n/a	n/a	n/a	-
9 Downstream transportation	n/a	n/a	n/a	n/a	n/a	n/a	-
10 Processing of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
11 Use of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
12 End-of-life treatment of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
13 Downstream leased assets	n/a	n/a	n/a	n/a	n/a	n/a	-
14 Franchises	n/a	n/a	n/a	n/a	n/a	n/a	-
15 Investments	n/a	n/a	n/a	n/a	n/a	n/a	-



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EnergoNuclear	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
Gross GHG emissions – Scope 1 (tCO <sub>2</sub> equivalent)	40.87	57.54	64.84	72.35	78.81	+58.64%	Explanations below
		65.88		80.69	87.15		Scenario 1
		72.22		89.02	103.82		Scenario 2
							Scenario 3
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	n/a	n/a	n/a	n/a	n/a	n/a	-
Gross GHG emissions – Scope 2 by site (tCO <sub>2</sub> equivalent)	11.67	15.62	14.87	18.41	19.22	+27.42%	Explanations below
		17.60		20.38	21.19		Scenario 1
		19.57		22.36	25.15		Scenario 2
							Scenario 3
Gross GHG emissions – market-based Scope 2 (tCO <sub>2</sub> equivalent)	7.78	11.63	12.55	14.70	15.85	+61.31%	Scenario 1
		13.56		16.63	17.78		Scenario 2
		15.48		18.56	21.63		Scenario 3
Gross GHG emissions – Scope 3 (tCO <sub>2</sub> equivalent)	326.74	351.67	1,005.62	468.29	379.37	+207.77%	-
1 Purchased goods and services	293.50	293.50	0	293.50	293.50	-100%	-
<i>(Optional sub-category: Cloud computing and data services)</i>	-	-	-	-	-	-	-
2 Capital goods	-	-	-	-	-	-	-



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EnergóNuclear	Base year	2025		Milestones and target years			Comments
	2023	Proposed	Actual	2030	2050	Annual % target/base year	
3 Fuel and energy-related activities Activities (not included in Scope 1 or Scope 2)	-	-	-	-	-	-	-
4 Upstream transportation and distribution	-	-	-	-	-	-	-
5 Waste generated in operations	31.76	31.76	20.02	40.83	46.88	-37%	
6 Business traveling	-	-	-	-	-	-	-
7 Employee commuting	15.09	26.41	26.15	33.95	38.98	+73.29%	
8 Upstream leased assets	n/a	n/a	n/a	n/a	n/a	n/a	-
9 Downstream transportation	n/a	n/a	n/a	n/a	n/a	n/a	-
10 Processing of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
11 Use of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
12 End-of-life treatment of sold products	n/a	n/a	n/a	n/a	n/a	n/a	-
13 Downstream leased assets	n/a	n/a	n/a	n/a	n/a	n/a	-
14 Franchises	n/a	n/a	n/a	n/a	n/a	n/a	-
15 Investments	n/a	n/a	n/a	n/a	n/a	n/a	-
Total GHG emissions (by site) (tCO <sub>2</sub> equivalent)	379.28	424.84	1,085.33	559.05	477.40	+185.15%	Scenario 1
		435.16		569.36	487.71		Scenario 2
		443.47		579.67	508.34		Scenario 3
Total GHG emissions (market-based) (tCO <sub>2</sub> equivalent)	375.39	420.85	1,083.01	555.34	474.03	188.50%	Scenario 1
		431.12		565.61	484.30		Scenario 2
		439.38		575.87	504.82		Scenario 3



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## NuclearelectricaServ

Emissions generated by NuclearelectricaServ activities are managed and reported by the contractual partners, eliminating the need to set specific greenhouse gas emissions reduction targets within the organisation. The entity has a transportation agreement for employees offered by NPP, which allows the re-invoicing of corresponding emissions to NPP. It also benefits from a bailment agreement for the head office, where utilities such as electricity, heating, domestic water and waste disposal are re – invoiced. In addition, there is a subletting contract with the Headquarters for the Bucharest offices, where all existing utilities, including the Company's pre – determined cleaning service, are re – invoiced, and the necessary materials are temporarily stored and re – invoiced to the Headquarters. The transfer of chemicals, such as detergents and cleaning solutions, takes place on the NPP platform, which is responsible for reporting them. The entity does not store fuel, as the refuelling of vehicles is done at PECO stations based on fuel vouchers.

In the year 2025, less works and services were performed for the purpose of conservation and maintenance of the site of Units 3 and 4 of Cernavoda NPP, which led to a reduction of GHG emissions related to purpose 3, class 1 “Goods and services purchased”.

Also, in 2025 there were no uranium concentrate acquisitions, which significantly decreased the GHG emissions related to Scope 3, class 1 “Goods and services purchased” for Pitesti NPP.

No significant events relevant to GHG emissions are expected in the period between the date of finalisation of

the GHG reports and the date on which the 2025 financial statements are due to be completed.

Data on the origin of the energy used: For the EnergoNuclear headquarters in Bucharest Lacul Tei there is a lease contract that includes utilities (including electricity consumed). There is an electricity supply contract with SNN for the electricity consumption of the temporary low – voltage electrical installation on the site of Units 3 and 4 of Cervavoda NPP.

The increase in the targets until 2035 is directly proportional to the increase in the number of staff because the activities in LNTP and FNTP will be much more complex and will require a much greater effort from EnergoNuclear S.A. Regarding the targets for the years 2040 – 2050, EnergoNuclear S.A. is a project company, an SPV established specifically for the continuation of the Project for the construction and completion of Units 3 and 4 of the Cernavoda NPP, and after their commissioning the Company's activity objective will be fulfilled. Consequently, for EnergoNuclear S.A., the classical methods of calculation and reduction of GHG emissions cannot be applied as in the case of companies that have well defined, concrete activities and whose number of staff does not fluctuate substantially depending on each stage of activity.

Also, EnergoNuclear S.A.'s vision is strictly limited by the project's completion deadline.

The increase in Scope 1, 2 and 3 CO2 emissions is directly proportional to the increase in the number of employees needed for LNTP and FNTP (until 2035).

For Scope 3, emissions by 2035 will be at least equal to base year emissions, but the upward trend is exponential. Due to the difficulties of estimation and calculation, no targets have currently been set for Scope 3 emissions for EnergoNuclear S.A.

The emissions have been presented at consolidated Group level. Other investees (such as related entities, joint ventures or unconsolidated subsidiaries that are not fully consolidated in the Consolidated Accounting Group's financial statements) and contractual arrangements that are unstructured joint arrangements through an entity (i.e., jointly controlled operations and assets) over which it exerts operational control have not been included.



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## Methodological issues

The methodologies, key assumptions and emission factors used to calculate or measure the GHG emissions are presented below:

### Scope 1 – Direct emissions coming from the Company's activities on site and from the car fleet – property of the company

#### Cernavoda NPP, Pitesti NFP, SNN Headquarters, FPCU Feldioara, EnergoNuclear, Nuclearelectrica Serv – methodology Scope 1

The sources of CO<sub>2</sub> emissions on the site of the 5 entities are as follows:

- diesel burning in diesel generators
- fuel consumption for specialised technological equipment
- fuel consumption for the car fleet
- natural gas consumption
- CLU burning in the boilers of the Start – Up Thermal Plant (CTP) – specific to Cernavoda NPP;
- equipment loading with refrigerants (Freon) – fugitive emissions.

The following methodologies were applied to calculate the CO<sub>2</sub> emissions:

- for fuel consumption, an emission factor of 2.5708 kg of CO<sub>2</sub>/litre or 3087.94462 kg of CO<sub>2</sub>/tonne (depending on the activity data) for Diesel, of 2944.32093 kg of CO<sub>2</sub>/tonne for CLU, and of 2.0619 kg of CO<sub>2</sub>/litre for gasoline have been applied (the factors

were published by UK DEFRA for 2025);

- for gas consumption, an emission factor of 0.2025 kg CO<sub>2</sub>/kWh was applied, as published by the Ministry of Environment, Water and Forest under Order no. 2641/2023);
- for fugitive emissions, the amount of refrigerating agent loads into the installations in 2025 were associated with the global warming potential (as published by UK DEFRA in 2025, based on the IPCC AR5 values, depending on the use refrigerating agent (stated in the safety data-sheets of each product)).

### Scope 2 – CO<sub>2</sub>e emissions coming from purchase of electricity and used for own purposes

This category includes indirect emissions related to the purchase of electricity or heat acquired and consumed by the Company. The methodology applied to inventory the Scope 2 CO<sub>2</sub>e emissions is aligned with the international good inventory and reporting practices, and complies with the applicable rules under the standards “GHG Protocol: A Corporate Accounting and Reporting Standard”.

Biogenic emissions have been excluded from the calculation because they are not applicable to the type of activities carried out by the SNN Group, as they are not relevant for the analysed emission sources.

*The following formula was applied: Total CO<sub>2</sub> (tonnes of CO<sub>2</sub>) = Electricity for internal consumption purchased from third parties x Emission factor (gCO<sub>2</sub>/kWh) of the third producer x 0.000001*

#### Cernavoda NPP, Pitesti NFP, SNN Headquarters, FPCU Feldioara, EnergoNuclear, Nuclearelectrica Serv – Methodology Scope 2

For each entity, the GHG emissions of Scope 2 are mainly calculated based on the electricity consumption measured in the local grid and the supplier – specific emission factors (site-based), and the ANRE (National Energy Regulatory Authority) emission factor – market based. Emission factors specific to the utilities providers, from which we purchased electricity, as valid for 2024, were used, because the electricity labels was not available for 2025.

Electricity supplier	Consumption place	Emission factor 2024 [gCO <sub>2</sub> /kWh] of third producer	Emission factor published by ANRE in 2024 [g/kWh]
Hidroelectrica	Cernavoda NPP	4.332	179.72
PPC Energie	Pitesti NFP	151.7	
PPC Energie	EnergoNuclear	151.7	
Hidroelectrica	SNN Headquarters – Polona	4.332	
Premier Energy	SNN Headquarters – Crystal Tower	199.03	
Hidroelectrica	FPCU Feldioara	4.332	



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Emissions generated by Nuclearelectrica Serv activities are managed and reported by the contractual partners, eliminating the need to set specific greenhouse gas emissions reduction targets within the organisation. The entity has a transportation agreement for employees offered by NPP, which allows the re-invoicing of corresponding emissions to NPP. It also benefits from a bailment agreement for the head office, where utilities such as electricity, heating, domestic water and waste disposal are re – invoiced. In addition, there is a subletting contract with the Headquarters for the Bucharest offices, where all existing utilities, including the Company's pre – determined cleaning service, are re – invoiced, and the necessary materials are temporarily stored and re – invoiced to the Headquarters. The transfer of chemicals, such as detergents and cleaning solutions, takes place on the NPP platform, which is responsible for reporting them. The entity does not store fuel, as the refuelling of vehicles is done at PECO stations based on fuel vouchers.

### Scope 3 – Methodology

The methodology applied to inventory the greenhouse gas emissions for all operations specific to the value chain of SN Nuclearelectrica is aligned with the international good inventory and reporting practices, and complies with the applicable rules under the standards “GHG Protocol: A Corporate Accounting and Reporting Standard” and “Corporate Value Chain (Scope 3) Standard”, developed by the World Business Council for Sustainable Development (WBCSD) and by the World Resources Institute (WRI). Scope 3 includes indirect emissions coming from a wide range of activities that are not included in Scopes 1 and 2, but are related to the organisation's activities. These are

emissions generated in operations across the corporate value chain.

The accuracy and relevance of the greenhouse gas emissions calculation are directly influenced by the emission factors applied. Calculation of the indirect emissions associated with Nuclearelectrica's value chain relied on the methodologies recommended under the abovementioned international standards, and the emission factors applied were selected from valid sources or internationally recognised databases, such as:

- DEFRA – UK Department for Environment, Food and Rural Affairs;
- ANRE – National Energy Regulatory Authority
- Information published by SNN Group's electricity suppliers.

Relevant tools developed by reference international organisations for economic sectors or industries relevant for calculation of Scope 3 emissions (e.g. hotel industry) were also used for calculation purposes.

For Scope 3 calculation, the operations of SNN executive (Headquarters), Pitesti NFP, Cernavoda NPP, EnergoNuclear, FPCU Feldioara and Nuclearelectrica Serv were considered.

In order to determine the generating activities and the sources of indirect greenhouse gas emissions specific to the Company's value chain, an analysis of the operations carried out at the six entities was carried out. This was aimed at understanding the business specifics and the

particularities of the value chain in order to be able to identify the activities to be included in the greenhouse gas emissions accounting process. Further to the assessment carried out and based on the information supplied by the SNN Group representatives, the following activities applicable to the SNN Group were decided to be included in calculation of the greenhouse gas emissions.

### Activities applicable to the SNN Group that were included in calculation of the Scope 3 greenhouse gas emissions for 2025

Category	Activities or sources of emissions
Upstream activities	Purchase of goods and services
	Purchase of capital goods
	Energy and fuel-related activities (included in S1 and S2)
	Supply chain transport and distribution
	Waste generated from operations
	Business traveling
	Employee transport



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The GHG emissions data for the sustainability report marches the date in general financial statements; the financial year 2025 is the calendar year 2025. The remaining Scope 3 emission categories that have not been included are not applicable to the SNN Group at the time of FY 2025. The situation will be monitored from year to year for possible implementation of these categories. Due to the majority of the emissions occurring in the categories “Purchase of goods and services” and “Purchase of capital goods”, represented by financial data through expenditure (secondary data), the share of emissions represented by primary data for Scope 3 emissions is significantly lower. Only categories applicable to the SNN Group have been included in the Report. The other categories (e.g. franchises, renting of assets, used products of those sold, etc.) are categories not applicable in the field of activity of SNN.

GHG intensity per net income	2024	2025	%
Total GHG emissions (by site) per net income (tCO <sub>2</sub> equivalent/monetary unit)	5.28195E-05 tCO <sub>2</sub> equivalent/RON	1.720E-05	-67%
Total GHG emissions (market-based) per net income (tCO <sub>2</sub> equivalent/monetary unit)	(0.0000528195 tCO <sub>2</sub> equivalent/RON)	1.693E-05	-67%

The amount of the net income used for calculation of the GHG emission intensity is found in the SNN Group’s Individual Financial Statements to the Individual Profit and Loss Account Statement, under the line “Total income”. The total net income to which the intensity was reported in 2025 is RON 5,819,766,440.

There have been no changes in the definition given by the SNN Group and its upstream and downstream value chain from year to year to the reported GHG emissions; this is the first year of mandatory reporting under ESRS.

### Cernavoda NPP – Carbon emissions and their intensity 2024 – 2025 – Scope 1

Year	Total tonnes CO <sub>2</sub> released per year	Tonnes of CO <sub>2</sub> released by Diesel generators per year	Total tonnes of CO <sub>2</sub> released by the Start – Up Thermal Plant per year	Tonnes of CO <sub>2</sub> released by the Car Fleet
2024	950	885.06	65.06	169.71
2025	2544.12	997.406	26.499	138.313

### Pitesti NFP – Carbon emissions and their intensity 2024 – 2025 – Scope 1

Year	Total tonnes CO <sub>2</sub> released per year	Tonnes of CO <sub>2</sub> released by Diesel generators per year	Tonnes of CO <sub>2</sub> released by the Car Fleet	Tonnes of CO <sub>2</sub> released by process	Tonnes of CO <sub>2</sub> of fugitive emissions
2024	86.66	0.678	55.304	7.85	23.503
2025	83.75	0.216	56.625	8.763	18.14

### Cernavoda NPP – Carbon emissions and their intensity 2024 – 2025 – Scope 2 (market-based approach)

Item no.	Year	Self – produced electricity for internal consumption (MWh/year) <sup>9</sup>	Total CO <sub>2</sub> (tonnes of CO <sub>2</sub> )	Electricity purchased from third parties for internal consumption (MWh/year) <sup>10</sup>	Emission factor (g CO <sub>2</sub> /kWh) of third producer	Total CO <sub>2</sub> (tonnes of CO <sub>2</sub> )	Electricity supplier
1	2024	868,248.00	0	359.89	217.33	78.21	PPC
2	2025	898,475.00	0	3,294.73	4.332	14.27	Hidroelectrica

<sup>9</sup> Is the electricity from own production, that is produced by Cernavoda NPP for operation of its own equipment (pumps, valves, etc.)

<sup>10</sup> Is the electricity purchased by Cernavoda NPP under contracts with third parties and used to supply certain own users (warehouses, office buildings, car parks, etc.)



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### GHG removals and GHG emission mitigation projects financed through carbon credits | ESRS E1-7



Across the SNN Group, there have been no projects involving GHG removals and GHG emission mitigation projects financed through carbon credits. Thus:

- There are no set calculation assumptions, methodologies and frameworks applied by the Company (GHG removals and storage).
- There were no GHG removal activities to be converted into carbon credits
- There is no set degree of use or quality criteria that SNN uses for carbon credits
- The scope, methodologies, frameworks or how the residual GHG emissions would be neutralised have not been determined
- SNN Group has not made any public statement as to the GHG neutrality involving the use of carbon credits

Moreover, Cernavoda NPP Branch is not eligible for carbon credits, as it does not produce thermal energy using EU – ETS installations. Also, FPCU Feldioara does not fall under the greenhouse gas emissions trading scheme (HG 780/2006) and does not hold a greenhouse gas emissions permit for the period 2021 – 2030, because it does not have on site emission sources whose total rated thermal input exceeds the threshold of 20MW, according to Annex no. 1 to the procedure of the Ministerial Order no. 1256/2020. The nominal thermal output of the existing installations on site is approx. 8MW.

Removals	2024	2025	%
<b>Own operations</b>			
<b>Total GHG removals from own operations (tCO<sub>2</sub> equivalent)</b>	0	0	0%
<b>Value chain</b>			
<b>Total GHG removals in upstream and downstream (tCO<sub>2</sub> equivalent)</b>	0	0	0%
<b>Reversals (tCO<sub>2</sub> equivalent)</b>	0	0	0%

Carbon credits cancelled in the reporting year	2024	2025
<b>Total (tCO<sub>2</sub> equivalent)</b>	0	0
Share of removal projects (%)	0	0
Share of reduction projects (%)	0	0
<i>Recognised quality standard 1 (%)</i>	0	0
Share of EU projects (%)	0	0
Share of carbon credits qualifying as appropriate adjustments (%)	0	0

Carbon credits planned to be cancelled in the future	Amount before 31 December 2026
<b>Total (tCO<sub>2</sub> equivalent)</b>	0



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## SNN Group Climate change



### Internal carbon pricing | ESRS E1-8



The entities do not apply internal carbon price tracking systems, that are included in the financial statements, as risks related to the electricity purchase costs for the SNN Group. SNN Group's core business, i.e. electricity generation, has zero direct carbon emissions (excluding those resulting from the annual operational tests to the backup gensets). Therefore, the determination was that there was no need to put in place a special price tracking system. However, in terms of electricity trading, SNN has tools to constantly monitor the EUA<sup>11</sup> market quotations, because these are factored into the electricity pricing.

The activity of entities involving GHG emissions is limited to ancillary activities (transport, diesel unit testing) or Scope 3 supply chain emissions, which were inventoried for the first time during the reporting year 2023.

Types of domestic carbon prices	Volume concerned (tCO <sub>2</sub> equivalent)	Prices applied (EUR/tCO <sub>2</sub> equivalent)	Description description
Not applicable	0	Not applicable	Not applicable

<sup>11</sup> The EU market in trading GHG emissions, known as the European Greenhouse Gas Emissions Trading Schedule (EU ETS).

## SNN Group Climate change



### Anticipated financial effects from material physical and transition risks and the potential climate-related opportunities | ESRS E1-9



For the reporting period, the anticipated financial effects from material physical and transition risks and the potential climate-related opportunities have not been assessed and determined. Their materiality and the financial effect has been reviewed in the dual materiality assessment. Details about this analysis of the physical and transition risks have been presented according to IRO-1 – Description of the processes pursued to identify and assess the material impacts, risks and opportunities can be found at the beginning of the E1 chapter.



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- 🔍 Own workforce
- 💡 Value chain
- 👨👩👧 Affected communities
- 👤👥 Consumers and end-users
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## SNN Group Pollution



Description of the  
processes pursued to  
identify and assess the  
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material impacts, risks  
and opportunities  
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Environmental protection has been and remains a constant concern for Group SNN and all its employees. The environmental policies and competent authorities impose specific requirements aimed at reducing or even eliminating any negative impact on the environment due to the activities carried out by the Group companies.

The risks associated with these activities are identified, assessed and recorded, and measures to prevent or reduce these risks are implemented through a risk management process. These measures result from the application of nuclear and environmental regulations, as well as voluntary compliance with SR EN ISO 14001:2015 and Regulation (EC) 1221/2009 on the Eco – Management and Audit Scheme (EMAS).

Details of activities and environmental performance are available in the annual Environmental Statements for each site, which can be found on the SNN website.

The activities carried out in Cernavoda NPP, in respect of which the environmental analysis is carried out to identify impacts, risks and opportunities, include, but are not limited to:

- operation of the installations and equipment of Cernavoda NPP, under normal and abnormal operation, start – up, shutdown, transient, and emergency conditions;
- maintenance and repair activities;
- projects, and project changes;
- improvement of the plant's systems and installations, including upgrades, refurbishments and changes thereto;

- storage and transfer/transport in installation;
- activities performed based on contracts for purchases of services or products;
- support and ancillary activities;
- any changes and abnormal situations related thereto.

In identification of the environmental matters, the activities are analysed taking into account the following environmental factors:

- pollutant emissions into air;
- pollutant discharges into water;
- soil and subsoil pollution, discharges on soil/subsoil;
- use of chemicals;
- resources consumption (water, fuel);
- generation (radioactive, hazardous or non-hazardous non-radioactive industrial) of waste;
- noise generation;
- emissions of heat, radiations and vibrations;
- damage to biodiversity (fauna, flora);
- process leaks from equipment/systems (oil, glycol, etc.);
- legal requirements/authorised limits;
- energy consumption.

For **Pitesti NFP**, environmental pollution can only occur under accident conditions, and will be local in such conditions. With the measures it puts in place, Pitesti NFP aims to pursue its business with a minimum impact on the environment and the resources.

Pitesti NFP pursues its business in line with the requirements of the revised Environmental Permit issued under the Government Decision no. 568/2023 amending the Annex to the Government Decision no. 24/2019.



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Pitesti NFP's manufacture of CANDU-6 nuclear fuel bundles can cause indoor and outdoor air pollution, soil pollution, pollution with substances of concern and of very high concern. Pitesti NFP's activity cannot generate water pollution because wastewater is not discharged directly into any outfall; this is collected, analysed and then transferred to the Treatment Plant of the Nuclear Research Institute (ICN), located on a platform shared with Pitesti NFP.

The parameters investigated and the investigation frequencies are set out under the revised Environmental Permit, i.e. the Environmental Radioactivity Monitoring Programme (which is also included in the Environmental Permit).

In identification of the direct environmental matters, the activities are analysed taking into account the following environmental factors:

- pollutant emissions into air
- soil and subsoil pollution, discharges on soil/subsoil
- use of chemicals
- consumption of resources, including energy
- waste generation
- noise generation
- emissions of heat, radiation and vibrations

In identification of the indirect environmental matters, consideration is given to:

- service lifecycle-related matters (design, development, packaging, transport, use and recovery/disposal of waste).

- environmental performance of contractors, subcontractors and suppliers.
- range and nature of services (transport, catering, etc.).

Fabrica de Prelucrare a Concentratelor de Uraniu (FPCU Feldioara) processes the technical-grade uranium concentrates to obtain the sintered UO2 powders needed for production of the nuclear fuel bundles at Pitesti NFP Branch.

Stakeholders are consulted on environmental matters. The nuclear field is strictly regulated and monitored by regulatory authorities, governmental organisations, NGOs and the general public. For this reason, SNN is dedicated to adopting the latest industry standards to demonstrate its commitment to environmental protection and public safety.

In order to maintain good information and communication with all categories of interested audiences, the Community Information and Consultation Council (CICC) was created at Cernavoda NPP. Its role is to identify the issues, concerns and interests of the community and to provide consultation, advice and opinions on community expectations, thus contributing to the continuous improvement of on – site activities and community well – being.






The pollution-related impacts, risks and opportunities are identified and assessed in an internal workshop, as part of the double materiality assessment. The biodiversity-related impacts, risks and opportunities were identified and by

consulting other literature sources, as well as the studies and surveys conducted to underpin the issue of the operating and environmental permits, and the risk registers, as put together for each risk area. These are summarized in the table below and are addressed in the following sections.

Unlike the previous year, the potential negative impact regarding the “contamination of the floors or of various surfaces with chemicals and mixtures, including waste or radioactive chemicals and mixtures” was addressed separately for the sub-topics “Hazardous Substances” and “Substances of Very High Concern”, whereas in the past, it used to be treated as a single impact and a common risk for both sub-topics. The risks identified have been rephrased, where appropriate, for clarity and coherence, without thus affecting the matters considered in the past. In the 2025 materiality assessment process, no opportunities were identified on pollution topics and the risks identified in the financial materiality assessment were found to be immaterial.



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Pollution			
Topic	Sub-topic	Sub-sub-topic	Impact
Pollution	Pollution of air	n/a	<b>Potential, negative impact:</b> Release of non-radioactive NOx emissions. <i>(Applicable for the entities Cernavoda NPP, Pitesti NFP, FPCU Feldioara, and NuclearelectricaServ)</i>
Pollution	Pollution of air	n/a	<b>Potential, negative impact:</b> Uncontrolled radioactive releases in air: Release of airborne dusts with uranium aerosols (only Pitesti NFP, FPCU Feldioara) or radioactive aerosols (Cernavoda NPP) in concentrations higher than the permitted values due to installation incidents, into the work environment and the external environment. <i>(Applicable for the entities Cernavoda NPP, Pitesti NFP and FPCU Feldioara)</i>
Pollution	Pollution of water	n/a	<b>Potential, negative impact:</b> Pollutant infiltration into the groundwater. <i>(Applicable for the entities Cernavoda NPP, Pitesti NFP and FPCU Feldioara)</i>
Pollution	Pollution of soil	n/a	<b>Potential, negative impact:</b> Seepage of pollutants into the ground in case of an accident or improper management of waste or liquid hazardous substances. <i>(Applicable for the entities Cernavoda NPP, Pitesti NFP and FPCU Feldioara)</i>
Pollution	Pollution of living organisms and food resources	n/a	<b>Potential, negative impact:</b> Pollution on crops in the area of influence of the site. <i>(Applicable for the entities Cernavoda NPP, Pitesti NFP and FPCU Feldioara)</i>
Pollution	Substances of concern	n/a	<b>Potential, negative impact:</b> Contamination of floors or other surfaces with hazardous chemical substances and mixtures (Substances of concern); <i>(Applicable for the entities Cernavoda NPP, Pitesti NFP and FPCU Feldioara)</i>
Pollution	Substances of very high concern	n/a	<b>Potential, negative impact:</b> Contamination of floors or other surfaces with hazardous chemical substances and mixtures (Substances of very high concern); <i>(Applicable for the entities Cernavoda NPP, Pitesti NFP and FPCU Feldioara)</i>

The risks and opportunities identified for pollution-related topics were assessed as insignificant in this exercise.

## SNN Group Pollution



### Pollution-related policies | E2-1



#### Cernavoda NPP

SNN's ESG policy includes specific requirements leading to minimisation or elimination of any potential negative impact on the environment due to the Company's activities. According to the ESG policy, SNN management make a priority of assuming the responsibility for operation of the nuclear assets at nuclear safety excellence, maintenance of the assets, keeping the environmental releases below the regulated figures, and maintenance of the production capacity above the average industry level.

The Environmental Protection and Radiological Safety Group, which operates at SNN level, monitors implementation of the Environmental Protection Policy across the Company. Representatives of all the SNN entities sit in this group.

The Management System developed and implemented in SNN SA addresses, in a coherent, coordinated and unitary fashion, the components related to nuclear safety, protection against ionising radiation, environmental protection, quality management, occupational health and safety, physical protection, protection against cyber threats, control of nuclear safeguards, protection of classified information, planning and response to emergencies, sale of the produced electricity and heat, and matters related to economic performance.

The environmental policy of Cernavoda NPP is part of the Integrated Site Policy and is assumed under signature by the management; Cernavoda NPP's CEO is responsible for application of this policy. SNN has in place a procedure for external communication (RC-00p10 SNN procedure for

external communication directly or through the media) which ensures that all necessary information, including information related to the pollution policies and procedures, is made available to stakeholders.

In a complex and highly dynamic legislative climate facing multiple many challenges, Cernavoda NPP has managed to continuously evolve and improve its performance, by achieving its goal of becoming an organisation with a sound nuclear safety culture, at the top of the world nuclear industry, in terms of both results and individual and organisational behaviours.

Cernavoda NPP has devised and put in place specific requirements to minimise the environmental impact resulting from the activities carried out inside the plant. The environmental management process helps control of all activities with an impact on the environment with a view to complying with the requirements and limits imposed under the Operating Permits, the Environmental Permit and the Water Management Permits, the standard SR EN ISO 14001, and the EMAS registration.

The procedures laying down the processes and work practices in Cernavoda NPP set out the responsibilities for all categories of staff of Cernavoda NPP in terms of identification of the environmental matters attached to the activities, assessment of the potential environmental impact and definition of the applicable measures to minimise or remove the risk to the environment, reduce the amounts of waste and control them strictly, as well as to reduce pollution caused by operation of Cernavoda NPP.



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Specific environmental management requirements can be found in the documents of the Environmental Management process described in the related procedure. Process coordination is provided by the Management Systems Monitoring and Development, through the Environmental Protection Assessment Group.

Procedures for the management of chemical substances are devised and approved at the site level, ensuring rigorous quantitative and qualitative control, and appropriate monitoring and reporting to the relevant authorities.

In what regards the company NuclearelectricaServ, it provides services for Cernavoda NPP and on the NPP site with which it has signed Environmental Agreements in which the impacts and risks resulting from the provision of services are identified and by which it is obliged to comply with all legal requirements and Cernavoda NPP procedures regarding the reduction of pollution.

Cernavoda NPP has in place a procedure for the Environmental analysis, determination of environmental matters and establishment of material environmental matters in Cernavoda NPP, which sets out a way of working for identification, assessment and determination of the responsibilities and measures related the identified environmental matters, in order to improve the environmental performance of Cernavoda NPP, pursuant to the requirements of the Regulation (EC) No 1221/2009 on the Community eco – management and audit scheme (EMAS), the Commission Regulation (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to the

Regulation (EC) No 1221/2009, and the standard SR EN ISO 14001/2015.

Cernavoda NPP has in place the procedure SI-01365-P082 – Environmental analysis, determination of environmental matters and establishment of significant environmental issues at Cernavoda NPP.

In identification of the direct environmental matters, the activities must be analysed taking into account the following environmental factors:

- pollutant emissions into air
- pollutant discharges into water
- soil and subsoil pollution, discharges on soil/subsoil
- use of chemicals
- resources consumption (water, fuel)
- generation (radioactive, hazardous or non-hazardous non-radioactive industrial) of waste – noise generation o emissions of heat, radiation and vibrations
- damage to biodiversity (fauna, flora)
- process leaks from equipment/systems (oil, glycol, etc.)
- legal requirements/authorised limits
- energy consumption.

The Environmental Policy of Cernavoda NPP provides for the possibility of putting in place a Management System in accordance with the legal requirements and with the CNCAN Rules for Nuclear Management Systems, and voluntarily incorporates the requirements of the management standards SR EN ISO 14001, including the EMAS registration under Regulation (EC) No 1221/2009 on the Community eco – management and audit scheme

(EMAS), Regulation (EU) No 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) No 1221/2009 and Regulation No 2026/2018 amending Annex IV to Regulation (EC) no. 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community eco – management and audit scheme. Implementation of these environmental performance standards validates a commitment to environmental performance, on all environmental elements (air, water, soil, subsoil, noise and waste).

The Integrated Management System, put in place together with the requirements imposed under the CNCAN rules and the requirements of the standards to which Cernavoda NPP has voluntarily decided to adhere, such as SR EN ISO 14001, SR EN ISO 27001, SR EN ISO 45001, SR EN ISO 17025, and SR EN ISO 37001, also the EMAS Regulation – Eco Management and Audit Scheme (Community Eco – Management and Audit System). The Management System of Cernavoda NPP is subject to licensing against the Requirements of Law no. 111/1996 on the safe performance, regulation, authorisation and control of nuclear activities, republished, as subsequently amended and supplemented.

The emergency procedures under the Site Emergency Plan feature individual action procedures in case of leakages or contamination with dangerous chemicals, as well as procedures that regulate the flow for advising the authorities of reportable events. No reportable events impacting the environment and the population have been observed.



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Through the **NuclearelectricaServ policy** in the field of quality, environment and occupational health and safety, the management of the organisation is interested in ensuring high quality products and services made in the context of a responsible concern for the safety of the environment. The organisation's management considers the quality of the services offered and compliance with environmental regulations to be of paramount importance.

Through the integrated management system adopted, Nuclearelectrica Serv management ensures that all activities performed by its employees are carried out in a controlled manner, in compliance with legal and regulatory requirements in the environmental field as well as contractual requirements.

For the identification of environmental issues Nuclearelectrica Serv has established procedures which specify the criteria for the activities it carries out and the responsibilities for the personnel involved. It also has procedures in place to establish criteria for the procurement and acceptance of chemicals. All chemical substances/products are checked at the tendering stage in order to procure only those with the lowest risks for the environment and human health.

These policies and procedures are made available to stakeholders via the NuclearelectricaServ website.

#### Pitesti NFP

Under the Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational

safety, emergencies and health, physical protection, control of nuclear safeguards, cyber security, and protection of classified information, has committed to take all necessary measures for the monitoring, assessment and continuous improvement of the environmental performance, pollution prevention, sustainable use of resources and biodiversity conservation. The ultimate responsibility for establishment, implementation, development and continuous improvement of the Integrated Management System, including the environmental matters, rests with the Pitesti NFP Manager.

The NFP policy is made available to stakeholders by displaying it in its offices and during training sessions, for both the external staff and employees. The NFP policy, as well as all NFP internal procedures are posted on the intranet, thus ensuring access thereto for all staff. The NFP Policy can also be made available to stakeholders (neighbours, NGOs, etc.), if so requested, and the internal and external communication work is covered by procedures (CN-MM-04 – Internal and external communication in the field of environmental protection).

When preparing the documentation for acquisition of substances and mixtures of concern, the requirements concerning their classification, packaging and labelling under the Regulation (EC) no. 1907/2006, concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), as subsequently amended and supplemented, and the Regulation (EC) no. 1272/2008 on classification, labelling and packaging of substances and mixtures, as subsequently amended and supplemented.









In Pitesti NFP, the **Environmental Analysis** procedure aims to identify the environmental matters and assess them to determine which of them are material. In order to improve the environmental performance, pursuant to the requirements of the Regulation (EC) No 1221/2009 on the Community eco – management and audit scheme (EMAS), the Commission Regulation (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to the Regulation (EC) No 1221/2009, and the standard SR EN ISO 14001/2015, NFP devised the procedure for *Environmental Performances Assessment*, setting out measures and actions intended at attaining the set environmental targets, which further leads to a higher environmental performance.

The Integrated Management System existing in Pitesti NFP is developed and put in place in with the legal requirements and with the CNCAN Rules for management systems and nuclear safety, and voluntarily integrates the requirements of the management standards SR EN ISO 9001:2015, SR EN ISO 14001:2015 and SR EN ISO 45001:2023, including Regulation (EC) no. 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco – management and audit scheme (EMAS), amended by the Commission Regulation (EU) 2017/1505 of 28 August 2017, and by the Commission Regulation no. 2018/2026 of 19 December 2018.

The Quality Management System is subject to licensing against the Requirements of Law no. 111/1996 on the safe performance, regulation, authorisation and control of nuclear activities, republished, as subsequently amended and supplemented.



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Pitesti NFP has put in place specific requirements leading to minimisation of the environmental impact of the activities carried out inside the plant. The environmental management process helps control of all activities with an impact on the environment with a view to complying with the requirements and limits imposed under the Nuclear Operating Permits issued by CNCAN, the revised Environmental Permit issued with the Government Decision no. 568/2023, the certification according to SR EN ISO 14001 and the EMAS registration.

Specific environmental management requirements are found in the documents of the “Environmental Protection Assurance” process, with environmental protection coordination provided by the staff of the Nuclear Safety and Licensing Service.

In order to avoid potential incidents/accidents involving chemical substances/mixtures, their storage depends chemical compatibilities, in keeping with the legislation in force, so there is no possibility that the presence and use of chemical substances may generate chemical accidents. As to the potential incidents due to substances and mixtures of concern, site – specific plans have been prepared to respond to emergencies with an impact on the environment; response teams have been set up the members of which are delivered regular training; and drills are carried out at a predefined frequency. This activity is covered by documented procedures, namely Preparedness for Emergencies with Environmental Impact and Responsiveness. The activities where substances/mixtures of concerned are used are documented, the staff is trained on the requirements of these documents, so that they can render their work activity avoiding any undesirable

situations that could lead to environmental pollution, or have an impact on people's health.

#### FPCU Feldioara

The Environmental Protection Service, Environment and Radiation Protection Laboratory which operates within FPCU Feldioara SRL monitors the implementation of the Environmental Protection Policy across the unit. Under the *Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety and health, physical protection, control of nuclear safeguards, cyber security, and protection of classified information*, FPCU Feldioara SRL has committed to take all necessary measures for the monitoring, assessment and continuous improvement of the environmental performance, pollution prevention, sustainable use of resources and biodiversity conservation.

Procedures for the management of chemical substances are devised and approved at the site level, ensuring rigorous quantitative and qualitative control, and appropriate monitoring and reporting to the relevant authorities.

The Management System put in place within FPCU Feldioara has been developed and implemented in accordance with the legal requirements and the CNCAN Rules for Management Systems and Nuclear Safety and voluntarily integrates the requirements of the management standards SR EN ISO 14001, SR EN ISO 27001, SR EN ISO 45001, SR EN ISO 17025, SR EN ISO 37001 and SR EN ISO 17025, including.

The Quality Management System is subject to licensing against the Requirements of Law no. 111/1996 on the safe

performance, regulation, authorisation and control of nuclear activities, republished, as subsequently amended and supplemented.

FPCU Feldioara SRL has put in place specific requirements leading to minimisation of the environmental impact of the activities carried out inside the plant. The environmental management process helps control of all activities with an impact on the environment with a view to complying with the requirements and limits imposed under the Nuclear Operating Permits issued by CNCAN, the Environmental Permit issued.

The emergency procedures under the Site Emergency Plan feature individual action procedures in case of leakages or contamination with dangerous chemicals, as well as procedures that regulate the flow for advising the authorities of reportable events. No reportable events impacting the environment and the population have been observed.

The said policies and procedures are provided for public information via FPCU Feldioara's website.

The SNN Group complies with the legal requirements, including the obligations in authorisations, protocols and permits, and operates the sites in accordance with the limits and conditions imposed. During the licensing procedures, stakeholders are informed of, and consulted on, the future projects, depending on the legal requirements. For the subsidiary EnergoNuclear, no applicable impacts, risks or opportunities have been identified for pollution-related topics, considering the EnergoNuclear's objective.



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# SNN Group Pollution

## Pollution-related actions and resources | E2-2



The SNN management have a holistic approach to inclusion of the ESG criteria into the Company's strategy and development plans. The key objective in terms of environmental protection is Zero environmental events, which means that we strive to have no event whatsoever leading to environmental pollution. So far, there has been no radiological or non-radiological environmental event or any other pollution-related events.

**Cernavoda NPP** has adhered to the nuclear excellence standards and is committed to a process of continuous improvement of the organisation's performance by benchmarking it against the best performing nuclear power plants worldwide.

Furthermore, **Pitesti NFP** is committed to achieve and prove sustainable performance in environmental protection, through good management of the activities/processes and products that can have a significant impact on the environment.

Within **FPCU Feldioara**, so far, there has been no radiological or non-radiological environmental event or any other pollution-related events. Each year, FPCU Feldioara SRL is subject to controls from environmental authorities (Environmental Guard – 2 planned controls, DJM – one planned SEVESO control). No deviations from legal provisions or environmental standards have been identified. The environmental analysis should highlight the proposals made to improve of the environmental management system with a view to enhancing the environmental performance (setting the environmental objectives, indicators and targets) and minimising the risks

according to the ALARA (as low as reasonably achievable) principle.

### Environmental Management System

An environmental management system is developed and applied to ensure protection and control of the environment during activities with a potential direct or indirect environmental impact. The Management System put in place in accordance with the legal requirements and the CNCAN Rules for Management Systems in the Nuclear Field voluntarily integrates the requirements of the management standards SR EN ISO 9001, SR EN ISO 14001, SR EN ISO 45001, SR EN ISO 17025, SR EN ISO 27001 and SR EN ISO 37001, including the requirements of the EMAS Regulation on the Community eco – management and audit scheme. The process is subjected annually to an independent audit conducted by certified auditing companies, and auditors' conclusions prove that the SNN Group has a functional environmental management, as a component part of the organisation's integrated management system, which is being continuously improved and aligned to the international environmental and population protection requirements.

- In 2025, Cernavoda NPP saw 3 inspections of the environmental authorities (Environmental Guard) and independent auditors (SR EN ISO 14001 and EMAS), but none of them found any departures from the legal provisions or the environmental standards.
- In 2025, no inspections of the environmental authorities were undertaken on Pitesti NFP. During 15 September - 18 September 2025 and during 22 - 23 September 2025, supervisory audits were undertaken



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for recertification of the Environmental Management System, and for validation of the Environmental Statement, in order to renew Pitesti NFP's registration with EMAS. No departures from the legal provisions or the environmental standards were found. There audits found no nonconformities. According to the audit report prepared after the recertification audit on the Environmental Management System, two recommendations/areas for improvement were stated and a Plan of Measures was developed for their implementation, in which measures, owners and time-limits for implementation were set out. The recommendations consisted in updating two process data-sheets in order to detail some activities, and a training for owners on how to complete the environmental analysis.

**The SNN Group holds certificates for its environmental management system, as follows:**

**For Cernavoda NPP**

- Certificate no. 56 concerning the Environmental Management System of SNN – Cernavoda NPP Branch for the Electricity and Heat Generation activity using nuclear sources and support and related activities, according to the conditions of the standard SR EN ISO 14001:2015, issued by IQNet and SRAC on 19 March 2024 and valid until 18 March 2027.
- EMAS Registration Certificate no. RO-000017, re-registration date 17 October 2024, expiry date 17 October 2027.

With their construction – inherent elements, nuclear units abide by a number of technical, administrative and procedural means and measures to control and monitor of the activities and equipment liable to affect the staff, the environment and the population with a view to eliminating and/or minimising the risks attached to the environmental factors. Cernavoda NPP implements and maintains a Defence in Depth concept, which includes technical and procedural barriers aimed at preventing and mitigating of the effects of accidents, and responding to emergencies, taking into account triggers related to equipment and human performance, as well as severe external conditions (earthquakes, floods, bad weather, etc.) which can affect the operation of the plant. Any departure from the management system documents is promptly reported, recorded and assessed for root – cause identification, and taking measures to prevent/minimise occurrence of risks through a sound management.

**For Pitesti NFP:**

- Certificate no. 4309 on the Environmental Management System of SNN – Pitesti NFP Branch for its nuclear fuel processing activity, according to the conditions of the standard SR EN ISO 14001:2015 (ISO 14001:2015), issued by IQNet and SRAC CERT on 22 September 2025 and valid until 21 September 2028.
- EMAS Registration Certificate no. RO-000018, re-registration date 28 March 2023, expiry date 28 March 2026 (a new certificate will be issued).












**Cernavoda NPP – Actions**

The environmental performance concept refers to the results of actions taken to continuously improve the environmental management system. as part of the integrated management system (attainment of the objectives, metrics and targets) either as a whole, or as one or more component elements. The environmental analysis should highlight the proposals made to improve of the environmental management system with a view to enhancing the environmental performance (setting the environmental objectives, indicators and targets) and minimising the risks according to the ALARA (as low as reasonably achievable) principle. The improvement proposals resulting from the environmental analysis are translated into actions across the plant, and their implementation is followed up through the implemented processes.

Cernavoda NPP has put in place environmental protection programmes. The programmes and monetary value attached to each programme for 2025 are shown below:



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Item no.	2025 Planned	2025 Actual
1.	<u>PJ-21-005</u> <u>Installation of charging stations for electric and plug – in hybrid cars in parking lots of U1 and U2</u>	Turnkey contract for the realisation of SF, DTAC, PTE and execution of works. By the end of 2025, design services have been performed in the form of contract deliverables. The Siting Clearance was obtained from Cernavoda Municipality, for all the site, by way of derogation from Law no. 50/1991; this Clearance stands for a Building Permit. Hence, the Building Permit Design (PAC) was no longer necessary. The Feasibility Study was issued, and the Technical Execution Design was prepared and reviewed/accepted in Cernavoda NPP.  AMOUNT SPENT IN 2024 = RON 15,120  AMOUNT SPENT IN 2025 = RON 115,000
2.	<u>PJ-20-006</u> <u>Implementation of the PMS (Power Management System) Platform at Cernavoda NPP</u>	Approved Feasibility Study. The procurement procedure is being resumed in order to contract the PTE and install the system. At the end of 2024 the Technical Assessment Report has been elaborated following the Market Consultation  In 2025, a procurement procedure was performed to award a turn-key contract. It was found that performance of this contract violate the provisions of a SNN decision (no. 411/ 23.09.2025). Thus, steps were taken to terminate it by mutual agreement. The supporting technical and economic documentation (PDC) will be revised and a new strategy for the continuation of the project will be devised.  AMOUNT SPENT IN 2024 – 2025 = RON 0
3.	<u>PJ-19-006</u> <u>Installation of a solar energy conversion system with photovoltaic panels in the Campus residential area (feasibility study)</u>	Feasibility Study (revised), approved. The procurement documentation is being drafted for contracting PTE and installing the system. The amount allocated upon budget rectification is the equivalent value of the services for the update of the Feasibility Study, one of the mandatory requirements to create the package for obtaining non-refundable government funds for the implementation of the project.  This amount was not initially foreseen as this requirement resulted after the 2024 budget was drafted.  The Procurement Initiation Documentation (DIA_CR# 39461 rev. 4) has been revised and submitted to DA-SNN with the NPP letter no. 001/09.01.2026.  The intention is to have the contracting strategy issued and to launch the procurement procedure in Q1 2026.  AMOUNT SPENT IN 2024 = RON 24,238  AMOUNT SPENT IN 2025 = RON 0.00



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Item no.	2025 Planned	2025 Actual
4.	<u>PJ-17-005</u> <u>Increasing the primary heat carrier production capacity, according to the demand of the local community in the city of Cernavoda, by putting in place a thermal point similar to PTU1 at Unit 2</u>	PTE drafted. The approval process within NPP/SNN for the continuation of the project according to the PTE is ongoing.  The updated investment project was re-approved in SNN (in the Technical and Economic Committee (CTE), the Technical, Economic and Social Committee (CTES), and the Board of Directors (BoD)). The Procurement Initiation Documentation started to be prepared for further awarding of the works.  AMOUNT SPENT IN 2024 = RON 1,404,656  AMOUNT SPENT IN 2025 = RON 0
5.	<u>The installation, maintenance and repair of zone temperature sensors, smart temperature sensor systems and sensing equipment, including motion and daylight control;</u>	Gradual implementation according to maintenance/repairs/production cost requirements
6.	<u>Installing and replacing energy efficient light sources;</u>	The project has been completed up to ~ 40% – supported from production expenditure – service contract

### Project – tritium removal facility (CTRF)

The project is part of the SNN's portfolio of initiatives aimed at the consistent implementation of the general policy of the Company, namely the concern for maintaining nuclear safety at the highest standards, and reducing both radiological risks for own staff and the public, as well as the environmental impact. The project aims to reduce the releases of tritium into water and air, by extracting the tritium from the heavy water, and storing it under a safe form in a dedicated facility, the elimination of heavy tritiated water from the category of

radioactive waste, thus significantly reducing the quantity of radioactive waste left to be managed at the end of the operational life of the two reactors.

Moreover, CTRF will determine:

- reduction of the risks of generating radioactive effluents and emissions of tritium in the environment,
- minimising the tritium concentrations from radioactive waste generated within the precincts of the nuclear systems using heavy water at Cernavoda NPP.

The project, worth EUR 194 million, is based on an implementation strategy, updated by SNN in 2018, based on the Feasibility Study, approved under Resolution no. 9/22.08.2018 of the Extraordinary General Meeting of Shareholders. The project involves the completion of the installation design (detailed design), the construction of the tritium removal plant, the tests and inspections for the purpose of its commissioning, a trial operation period of 6 months, followed by the putting of the plant into commercial operation, planned for the year 2026.



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The OGMS Resolution no. 5/05.07.2023 approved the amendment of the Implementation Strategy for the “Cernavoda NPP Tritium Removal Facility” Investment Project as a result of the update of the investment’s amount, based on the price increase indices between 2018 and 2022, and by including additional cost which had not been initially considered.

Under the EGMS Resolution no. 8/7.12.2023, conclusion by SNN of the financing agreement with the European Investment Bank (the “Agreement”), for the financing of the “Cernavoda NPP Tritium Removal Facility” Project was approved, with the following essential features:

Value	EUR 145 million
Currency	EUR
Duration	15 years, of which 4 years representing the grace period for the payment of the principal instalments
Period of use	36 months from the Agreement signing date
Interest	Fixed or Variable (at the Company's choice)
Analysis fee	EUR 145,000 payable within 30 days from the Agreement signing date
Non-use fee	0.12% per year, payable after a period of 12 months from the Agreement signing date, being applicable to the undrawn amount of the loan
Principal and interest rate repayments	Equal semi – annual instalments

Work was carried out to build the drainage system for level 91.00 (active and inactive collection tubs, including the related piping) and to install the reinforcement at the lower part of this level; in the next period, the reinforcement of the upper part will be completed, too.

In terms of procurement activity, KHNP was awarded 10 of the 23 procurement packages required for CTRF, with others in the process of contract signing. The main challenges are found in the award of the Control System and the Diesel Generators.

The Cernavoda Tritium Removal Facility (CTRF) project is implemented with the support of an integrated project team, represented by NPP staff and staff of Kinectrics Nuclear Romania SRL and Kinectrics Inc., i.e., specialists with expertise in different fields of activity.

#### Storage of chemicals – Cernavoda NPP

Cernavoda NPP is an end-user, and the substances and mixtures of concern are purchased for use in the chemical control of the fluids in the power plant’s circuits and equipment, for maintenance and repair purposes, for laboratory analyses and in activities/services implementing the changes/projects developed on the site.

The administration and management of the chemicals used in Cernavoda NPP is based on:

- National and EU legislation (REACH Regulation, CLP, etc.) in force that regulates the regime of dangerous substances and mixtures and specific regulatory acts by category of chemical substances/products;

- The requirements, limits and conditions approved under the applicable permits and clearance issued by the environmental protection regulatory and control authorities. The chemical products purchased directly or under services contracts and used in the activities of Cernavoda NPP are classified, packaged and labelled according to the legal requirements in force. Special consideration is also given to the appropriate labelling, i.e. writing of all the information required under the CLP Regulation (EC) and the best international practices (hazard pictograms, warning words, hazard statements (H) and precautionary statements (P) ), etc. which are taken, as applicable, from the containers in which the substances and mixtures of concern used are delivered onto the small – sized containers used for the activities in the process plants of Cernavoda NPP

The biocidal products acquired directly or under services contracts are also accompanied by the Clearances issued by the Ministry of Health in accordance with the legal provisions in force, are quantitatively and qualitatively monitored under the same conditions as those laid down in the procedures of Cernavoda NPP, and are reported on in accordance with the requirements and limits of the environmental permits.

All chemicals used in the activities of Cernavoda NPP, by direct purchase or under services contracts, are assessed/cleared and included in the List of Approved Chemicals (“Chemicals” Intranet app). The activities of Cernavoda NPP use only products that can be found in this app.



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The Safety Data Sheet of the products concerned are enclosed to any work package or work plan which use substances or mixtures. Also, for the activities where certain substances or dangerous mixtures are used in large quantities, an initial training is delivered to the staff who are to carry out the activity (IPEL), and who are thus presented the hazards dangers and compensatory measures due to be taken in case of accidental spills.

The activities of the subsidiary NuclearelectricaServ are carried out on the Cernavoda NPP site, so there were no independent actions of NuclearelectricaServ related to pollution.

#### Pitesti NFP – Actions

Within Pitesti) NFP, soil contamination can occur accidentally, further to equipment failures, errors, intentional human actions or earthquakes. To prevent soil and subsoil pollution, Pitesti NFP has taken the following measures:

- The unit's premises is made of concrete and is provided with gutters connected to the rainwater sewer;
- The radioactive solid waste temporary storage platform is equipped with a water collection base, which is checked regularly;
- Storages for oils and substances/mixtures of concern are provided with collection bases and absorbing material;
- Waste handling activities are documented in procedures to avoid risk of accidental soil pollution.

To prevent air pollution: NFP's ventilation systems are complex systems that include ventilation stations, air handling units, coolers, fans, chests, trails, filters, pre – filters arranged alone or in batteries, filter cloth, etc. The filters used by NFP in the ventilation systems are HEPA (High Efficiency Particulate Air) type high efficiency filters, with a retention class specific to the nuclear field H13 (99.95%).

In what regards operational expenditure with investments in research and development to innovate and develop safe and sustainable alternatives to the use of substances of concern or to reduce emissions in a production process: over the years NFP has replaced various substances of concern (e.g. carbon tetrachloride, trichloroethylene). In 2025 NFP had no operational expenditure on research and development to innovate safe and sustainable alternatives to substance use.

In accordance with the procedure CN – MM – 06 – Environmental Performance Assessment, NFP establishes, on a yearly basis, actions and measures which contribute to the achievement of performance indicators, respectively the achievement of objectives.

From the analysis of the values resulting from the environmental monitoring, no pollution requiring action plans, remedial measures, etc. were identified.







#### Storage of chemicals – Pitesti NFP

Pitesti NFP is an end-user of chemicals, which are used both in the production flow and for the physical and chemical analysis performed in the Chemical Analysis Laboratory. The Tender Books prepared for procurement of substances and mixtures of concern include requirements for protection of the environment and of the staff, as well as for compliance with the domestic and international legislation applicable to their marking, packaging, labelling and transport. Moreover, products are accompanied by Safety Data – Sheets, which users get familiar with. Safety Data-Sheets of the products concerned are requested for any work where chemical substances or mixtures are used. The environmental protection requirements applicable to procurement of chemicals are documented in the procedure entitled Application of the environmental protection requirements to performance of works, provision of services, and supply of products in Pitesti NFP.

In 2025, Pitesti NFP implemented the project *Ventilation and air conditioning plant – beryllium deposition area*, for which initially, before its implementation, a notice was submitted to the regulatory authority, in accordance with the provisions of Law no. 292 of 3 December 2018 on the assessment of the environmental impact of certain public and private projects, Annex 5A. After having reviewed the documentation, the environmental authority decided to close the notice because the proposed project was not subject to the environmental assessment procedure.



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### FPCU Feldioara

FPCU Feldioara is an end-user, and the substances and mixtures of concern are purchased for use in the chemical control of the fluids in the power plant's circuits and equipment, for maintenance and repair purposes, for laboratory analyses and in activities/services implementing the changes/projects developed on the site.

The administration and management of the chemicals used is based on:

- National and EU legislation (REACH Regulation, CLP, etc.) in force that regulates the regime of dangerous substances and mixtures and specific regulatory acts by category of chemical substances/products;
- The requirements, limits and conditions approved under the applicable permits and clearance issued by the environmental protection regulatory and control authorities. The chemical products purchased directly or under services contracts and used in the activities of

FPCU Feldioara SRL are classified, packaged and labelled according to the legal requirements in force. Special consideration is also given to the appropriate labelling, i.e. writing of all the information required under the CLP Regulation (EC) and the best international practices (hazard pictograms, warning words, hazard statements (H) and precautionary statements (P ), etc. which are taken, as applicable, from the containers in which the substances and mixtures of concern used are delivered onto the small – sized containers used for the activities in the process plants of FPCU Feldioara SRL

In 2024, FPCU Feldioara SRL had ongoing investments aimed at improving its environmental performance, including a new storage facility for the storage of nitric acid; this investment was completed in 2025, and it is now commissioned.



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# SNN Group Pollution



## Pollution-related targets | E2-3



Any activity in SNN Group is carried out only on the basis of approved documents that integrate the requirements of the applicable laws and standards. SNN Group applies the Best Available Techniques (BAT) to operate nuclear sites.

Units are operated in strict compliance with the requirements of the operating permits, and within the limits and conditions imposed under the operating policies and principles, as well as in the other documents approved by the authorities, which integrate the requirements of the applicable laws and standards. Any accidental violation is deep – dived into and is to CNCAN.

The general objectives of SNN Group are translated into entities objectives, which are then translated into specific objectives. The following areas shall be considered when setting specific targets: ensuring product quality, economic efficiency, nuclear safety and nuclear safety culture, environmental protection, occupational health and safety, cybersecurity, emergency management and business continuity, management system efficiency, compliance with the requirements of the Integrated Management System, implemented under Law 111/1996 (development of procedures on time, implementation of corrective/ preventive actions, realisation of staff training, compliance with compliance obligations, etc.), compliance with the requirements of the internal managerial control standards contained in OSGG 600/2018. The environmental management plans of Cernavoda NPP and Pitesti NFP set out measures and actions able leading to attainment of the set targets and implicitly of the environmental objectives.

In the elaboration of the methodology for setting pollution prevention and control targets, the standards and limits imposed by national legislation were taken into account. The analysis did not provide sufficient details to identify environmental thresholds, as this is not a required aspect according to the regulatory acts applicable to SNN Group operations.

### Cernavoda NPP

In Cernavoda NPP, the performance objectives, targets and indicators are cascaded from the SNN Group general objectives, whereas in departments or other units, specific objectives are cascaded from the objectives defined at site level. In order to attain the set objectives, improvement (linked to the general objectives) and current (basic) programmes are devised, approved, linked to the current activities of the departments.

The improvements made to the environmental management system is measured in the annual integrated management review (QARC), following the model presented in the EMAS Regulations. Additionally, effectiveness of the actions resulting stemming from the environmental analysis is reviewed in the environmental management process self – assessment. Whenever this analysis finds improvement-related effectiveness flaws, these are documented in the environmental review of the following year, and corrective measures are proposed.

The indicators selected for monitoring the effectiveness of pollution prevention measures are: biocide concentration in the effluent discharge below the maximum limit



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allowed in the water management permit, (falling within the maximum permissible limits), radioactive releases into the environment ( $U1+U2 < 9.25 \mu Sv$ ) for 2025 (a metric that considers the contribution of both gaseous radioactive releases and radioactive liquid releases), incidents with environmental impact (0), and emissions of non-radioactive gaseous effluents. **The main pollution target is to keep the values of all indicators below the maximum levels allowed by the applicable regulatory acts (Environmental Permit, Water Management Permit).**

In order to verify the compliance with this target, the values recorded in the environmental factor analysis bulletins are analysed and compared with the maximum limits allowed at national level. If overruns are identified, then the target can be considered to be missed.

The “environmental management” process owner is required to validate the zone-based environmental analyses carried out by the designated persons in charge. The document “Cernavoda NPP Environmental Analysis” is produced annually, depending on the date of the annual environmental audit, by the environmental management process officer, relying on the information contained in the Cernavoda NPP zone-based analyses.

The content of the document “Cernavoda NPP Environmental Analysis”, which is issued annually in the form of an Information Report (IR), must comply with the requirements of both the EMAS regulations and SR EN ISO 14001:2015, and will address at least the following chapters:

- Setting the organisational background. The corporate context refers to determination and understanding of the internal and external factors that are relevant to Cernavoda NPP and that may affect its ability to attain the expected performance of the environmental management system;
- Stakeholder identification and determination of their relevant needs and expectations. The stakeholders relevant to the management system are determined (authorities: MMAP, DJM, ABADL, CNCAN, GNM; other stakeholders: NGOs, etc.), the relevant needs and expectations of these stakeholders and which of these needs and expectations it should respond to, or decide to respond to. Where Cernavoda NPP decides to voluntarily adopt or agree to the stakeholders’ corporate context needs or expectations, which are not covered by the legal requirements, these become part of its compliance obligations;
- Identification of the applicable legal environmental requirements;
- Identification of the direct and indirect environmental matters, and determination of the material matters;
- Assessment of the environmental matters’ materiality;
- Assessment of the results of the investigations undertaken on previous incidents;
- Determination and documentation of the risks and opportunities. Whenever the environmental matters are identified, consideration is given to the following elements: risk of environmental accidents and other emergencies, with a potential environmental impact (e.g. chemical accidents) and any potential abnormal situations that could lead to a potential environmental impact. In operational activities, risks are assessed
  - according to the procedures in force;
  - Examination of the existing processes, practices and procedures.



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Other performance indicators considered for 2025:

Environmental Objectives	Name of ratio	Environmental Targets
1. Waste separation and minimisation	1.1 Improving the promotion of waste separation and minimisation	1.1.1 Issuing a bi – monthly Newsletter
2. Maintaining all certifications	2.1 Maintaining the certification of the Environmental Management System according to SR EN ISO 14001:2015	2.1.1 “0” non-conformities resulting from the recertification audit.
	2.2 Maintaining the registration of Pitesti NFP in EMAS	2.2.1 “0” non-conformities resulting from the EMAS verification-validation audit.
3. Compliance with legal requirements	3.1 Compliance with the conditions imposed by the environmental authorities	3.1.1 “0” penalties applied further to the environmental authorities’ inspections for waste – management related issues.
4. Training of all own and contract-based employees	4.1 Annual retraining of all own and contract-based employees	4.1.1 100% of own and contract staff reappraised on an annual basis through Cernavoda NPP’s Environmental Protection training.
5. Recycling of non-hazardous waste	5. Percentage of recycled waste out of total non-hazardous waste generated	5.1.1 more than 50% of the non-hazardous waste generated recycled  The objective remains to maintain a high level of performance and legal compliance, while providing flexibility to strengthen the internal collection, sorting and traceability processes.
6. Non-recycled non-hazardous waste	6.1 Percentage of non-recyclable waste out of total non-hazardous waste generated	6.1.1 less than 50% of the non-hazardous waste generated recycled. Target to maintain the share of non-recyclable waste. This approach ensures both the compliance with the principles of circular economy and the continuity of the operating processes specific to the facility.

In the update of the 2025 Waste Prevention and Reduction Programme, the performance indicators set in the previous cycles (referring to total or specific quantities of solid waste or single streams, such as plastics) have been replaced by general percentage metrics, adapted to the actual structure of the waste managed on the site. Thus, the following metrics have been removed:

- Amount of generated solid waste (tonnes),
- Percentage of non-hazardous solid waste out of total,
- Amount of recovered plastics.

The targets were set to improve the environmental performance and not to correct some deficiencies, no exceedances of the limits imposed by the environmental authorisation of NPP, the authorisations for nuclear activities issued by CNCAN, legislation or by own procedures were recorded. Performance indicators are reviewed annually.

#### Pitesti NFP

NFP’s core business is manufacture CANDU-6 type nuclear fuel bundles under maximum safety, economic efficiency, and care for people and the environment, thus contributing to production of clean energy by complying with the legal and regulatory requirements applicable to activities in the nuclear field.

In addition to the measures regarding nuclear safety, the product quality, under the Pitesti NFP Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety, emergencies and health, physical protection, control of nuclear safeguards, cyber security, and protection of classified information,



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the NFP management have committed to take all necessary measures for the Monitoring, assessment and continuous improvement of the environmental performance, pollution prevention, sustainable use of resources and biodiversity conservation

In view of the above, each year the NFP sets objectives and performance indicators specific to environmental protection.

According to the procedure CN – MM – 06 “Environmental Performance Assessment”, NFP prepares, on a quarterly/half-yearly/yearly basis, an Analysis Report on the implementation of the Environmental Management Programme and, on a yearly basis, the Environmental Performance Assessment Report, which includes at least:

1. the degree of achievement of the environmental objectives, metrics and targets, including an explanation of the situations that led to their non-achievement and the corrective actions needed to be implemented;
2. the results of the assessment of compliance with the compliance obligations assumed by the NFP;
3. results of internal audits carried out in accordance with the requirements of procedure CN – AC – 23 and external audits in the field of environmental protection;
4. the results of the inspections carried out by the staff with environmental protection responsibilities within the SSNA as required by procedure CN – MM – 10

Pitesti NFP decided to implement the EMAS requirements. The decision to implement the requirements of this regulation was made voluntarily; Pitesti NFP obtained the

EMAS registration in 2020 and had it renewed in 2023; the EMAS Audit was undertaken in September 2025 and concluded with validation of the Environmental Statement; a new certificate will be issued before the expiry of the validity period of the existing certificate, namely before 23 March 2026.

After EMAS registration, Pitesti NFP is required under the abovementioned Regulation to set performance indicators concerning the following areas:

- energy efficiency;
- material efficiency;
- water;
- waste;
- biodiversity (for this area, Pitesti NFP has not set any indicator, but provided reasons in support of the lack of business relevance of such an indicator);
- emissions.

Being an EMAS registered organization, Pitesti NFP is bound to set annual environmental objectives, metrics and targets, and be concerned about performance at all times. In order to attain these targets and to meet the objectives, a programme setting out measures, actions, owners and implementation time – limits needs to be devised. Thus, the Environmental Management Programme is developed annually to set actions that aim to achieve the set targets. Stakeholders have not been involved in target setting.

The list of environmental objectives and targets is enclosed to the Environmental Performance Report, a report prepared by the staff of the Nuclear Safety and Licensing Service and a part of the annual Management Review Report.



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For 2025, Pitesti NFP set the following objectives, targets and environmental indicators:

Environmental Objectives	Name of ratio	Environmental Targets
1. Maintaining all certifications	1.1 Maintaining the certification of the Environmental Management System according to SR EN ISO 14001:2015	1.1.1 "0" non-conformities resulting from the recertification audit.
	1.2 Maintaining the registration of Pitesti NFP in EMAS	1.2.1 "0" non-conformities resulting from the EMAS verification-validation audit.
1. Compliance with legal requirements	2.1 Compliance with the conditions imposed by the Environmental Permit	2.1.1 "0" penalties applied by inspection bodies
3. Efficient use of electricity	3.1 Electricity consumption/manufactured FBs	3.1.1 Reduction by minimum 0.1% of the electricity consumption in 2025 v 2023,
4. Rational usage of materials	4.1 UO <sub>2</sub> powder processing yield	4.1.1 Increase by at least 0.02% of in the UO <sub>2</sub> powder processing yield in 2025 v 2023.
	4.2 Zy – 4 tube processing yield	4.2.1 Increase by at least 0.02% in the processing yield of Zy – 4 tubes in 2025 v 2024.
5. Streamlining drinking water consumption	5.1 Drinking water consumption/employee	5.1.1 Reduction by min. 0.1% of the drinking water consumption per unit in 2025 v 2024.
6. Minimisation of the amount of incinerable solid waste generated	6.1 Amount of incinerable radioactive solid waste generated, by reference to the number of nuclear fuel bundles produced	6.1.1 Maximum 0.30 kg/FB (which represents 55% of the maximum authorised amount of incinerable solid radioactive waste generated according to the environmental permit by reference to maximum authorised production, which is 0.56 kg/FB)
7. Reducing the emissions of radioactive gaseous effluents into the atmosphere	7.1 Amount of uranium removed through radioactive gaseous effluents, by reference to the number of nuclear fuel bundles produced	7.1.1 maximum 62.5 mgU/FB (which accounts for 15% of the amount of uranium authorised to be released through radioactive gaseous effluents under the Environmental Permit, by reference to the maximum authorised production)

For 2025, Pitesti NFP set the following air pollution prevention indicator: reduction of the amount of uranium released into the atmosphere through radioactive gaseous effluents, by reference to the number of fuel bundles (FBs) produced, i.e. a maximum of 62.5 mgU/FB (15% of the amount of uranium authorised to be released through radioactive gaseous effluents according to the environmental permit, by reference to maximum authorised output). The indicator fell within the proposed target.

Assessment of the progress made in attainment of the environmental targets and objectives is presented in the EMAS Performance Indicator Evolution Report. For the reporting year NFP did not set targets for emissions to water, as Pitesti NFP does not discharge water directly into the emissary. The radioactive wastewater is transferred to the ICN Wastewater Treatment Plant, where after treatment it is discharged to the emissary. takeholders have not been involved in target setting.

	2024	2025	2025	
			proposed	actual
Amount of uranium released through radioactive gaseous effluents [mgU]	548,378	434,311.01	62.5	39.6
Number of FBs produced	11,019	11,118		
Ratio between the amount of uranium released through radioactive gaseous effluents and the number of FBs produced [mgU/FB]	49.77	39.06		



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The recorded results are monitored on a monthly basis, and whenever a negative trend in reaching the targets is observed, corrective actions are determined.

When new environmental targets are set, the previously recorded values are fed in so that the newly – set targets support the environmental protection performance. Pitesti NFP did not define a metric indicator for the consumption of substances/mixtures of concern. Over the years, NFP has replaced certain substances, where possible, by less harmful to human health and more environmentally – friendly ones, for instance tetrachloride by kerosene. In addition to the above, the quantities used in the chemical analysis laboratory and in the manufacturing flow are not very large.

In support of the above, after having sent the documentation in accordance with the provisions of Law no. 59 of 11 April 2016 on the control of major accident hazards involving dangerous substances, to the Emergency Inspectorate of Arges, confirmation was received that Pitesti NFP is not a SEVESO facility.

The effectiveness of the actions implemented to prevent and control pollution is determined by the constant analysis of the results of the monitoring programmes of environmental factors. In case the results of the assessments indicate a tendency of decreasing the performance of the environmental management system (implicitly exceeding the maximum permissible limits), preventive actions are taken, according to the procedure CN – AC – 17 or corrective actions, according to the procedure CN – AC – 72. The targets were set to improve

the environmental performance and not to correct some deficiencies, no exceedances of the limits imposed by the environmental authorisation of NFP, the authorisations for nuclear activities issued by CNCAN, legislation or by own procedures were recorded.

#### FPCU Feldioara

Any activity in FPCU Feldioara is carried out only on the basis of approved documents that integrate the requirements of the applicable laws and standards. In FPCU Feldioara SRL, performance indicators/ environmental targets are set according to the environmental matters with material impact, as identified in its own business, and to the requirements concerning the performance obtained in the essential environmental areas: energy, materials, water, waste, and emissions. In establishing the performance indicators and environmental targets, the regulatory acts issued for the activity as well as the contribution of the departments that periodically perform environmental analysis specific to the activities carried out are considered.

Performance against targets is monitored monthly, and half-yearly based on relevant objective evidence; the trends in attaining the targets are assessed, and corrective actions determined whenever deviations are observed. The whole process is documented and reviewed annually by a certified external assessor. The unit is subject to Law no. 59 of April 11, 2016 on the control of major accident hazards involving dangerous substances, being classified as a SEVESO objective (minor risk). The recorded results are monitored on a monthly basis, and whenever a negative trend in reaching the targets is observed,

corrective actions are determined. When new environmental targets are set, the previously recorded values are fed in so that the newly – set targets support the environmental protection performance.

The indicator monitoring and compliance with the proposed targets are specified in:

1. The existing regulatory acts that govern performance of the activities on the Feldioara industrial platform;
2. The environmental factor monitoring programme approved annually by CNCAN Bucharest, which lists all the measures imposed under the regulatory acts and the inspection reports.

The targets were set to improve the environmental performance and not to correct some deficiencies, no exceedances of the limits imposed by the environmental authorisation of FPCU, the authorisations for nuclear activities issued by CNCAN, legislation or by own procedures were recorded. According to monitoring, the targets have not been exceeded.



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## SNN Group Pollution



Air, water and soil  
pollution | E2-4



In SNN Group, pollution can originate in two major sources: radioactive and non-radioactive emissions. For radioactive emissions, these are way below the limit set out by the nuclear regulator, and are part of the nuclear excellence programme.

### Cernavoda NPP

#### Non-radioactive emissions – Cernavoda NPP

Non-radioactive atmospheric emissions come from:

- fuel burning: resulting into CO<sub>2</sub>, dust, heavy metals, volatile organic compounds, etc.
- fuel management: resulting into volatile organic compounds (VOCs).

The term impact of these non-radioactive emissions is insignificant in the long-run, according to the environmental balance-sheet produced out by independent third parties for Cernavoda NPP.

The nuclear-based energy generation technological process of Cernavoda NPP does not use volatile organic substances. Also, there aren't any emissions of NO<sub>x</sub> or SO<sub>x</sub>.

#### Radioactive emissions – Cernavoda NPP

Building are: tritium, solid particles, iodine and noble gases. These are taken over by the plant's ventilation systems and are treated accordingly in the D20 vapor recovery systems and the ventilation and air filtration systems. The contaminated or potentially contaminated air is collected by the ventilation systems and is discharged via a common exhaust stack after filtering and monitoring.

The radioactive gas emissions are supervised by continuously monitoring the air discharged through the plant's stack with the aid of the Gas Effluents Monitor. For the releases of the potentially radioactive air, Derived Emission Limits have been set for each radionuclide, as approved by the regulator, i.e. CNCAN. The air filtration process ensures that releases into the air are kept within the limits approved by CNCAN.

The Derived Emission Limits are maximum quantities legally allowed or authorised for radionuclides that are released into the air so that neither the health of the population, nor the environment are affected. When calculating the atmosphere emission limits, the food chain and any potential concentration phenomena in some species are considered.



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Values of emission of liquid and gaseous radioactive effluents – Cernavoda NPP

	2024	2025	Maximum permissible dose constraint according to the CNCAN operating licenses microSv/year/unit
Radioactive emissions into the environment U1+U2 [ $\mu$ Sv]	9.08	8.72	100/Unit 1 50/Unit 2 50/DICA
Annual target set by Cernavoda NPP [ $\mu$ Sv/year]	<9.25	9.5	
Dose constraint for Cernavoda NPP [ $\mu$ Sv/year]	250	250	
Legal limit for individual members of the public [mSv/year]	1	1	

### ALARA indicators – Cernavoda NPP

The effectiveness of the ALARA policy in Cernavoda NPP is monitored by performance indicators based on the internal and external operating experience, and their regular reporting and analysis.

Performance indicators emphasise the effectiveness of the radiation protection programmes in optimising radiation exposure.

### Developments in collective doses and ALARA performance indicators – NPP

	2024	2025
Collective dose [0m mSv]	783.73	554.63
Internal collective dose [0m mSv]	280.15	190.69
Contribution of internal dose to total dose (%)	35.7	34.38
Maximum individual dose [mSv]	8.09	7.45
Average dose (Collective dose/ No. of persons exposed)	0.89	0.67

Dose limits	Measurement unit	Value
Statutory limit for the individual dose of occupationally exposed staff	mSv/year	20
Administrative limit for the individual dose of occupationally exposed staff	mSv/year	14

Reports on each pollutant that was set a limit under the water management permit are submitted on a monthly basis to the environmental authorities. The indicator “Water polluters meet the limits under the Water Management Permit (%)” is calculated monthly and annually; for this, limits set out in the permit are not exceeded.

The Radiation Protection Department prepares and submits regular reports on the developments observed in collective doses and ALARA performance indicators, thus increasing the engagement of the Power Plant’s staff in the control and optimisation of the occupational exposure to ionising radiation. How these objectives are attained is tracked via ALARA process, and the ALARA committees operate with excellent results.

### Radioactive wastewater monitoring – Cernavoda NPP

The radioactively contaminated waste water collection system is intended to collect of all aqueous radioactive waste resulting from the power plant’s process systems and from maintenance, overhaul and decontamination operations, followed by discharge of the cooling water from condensers into the discharge canal, but ensuring compliance with the regulated limits for radioactive material concentrations when discharged into the emissary. The discharge is done intermittently into the cooling water from condensers.



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In order to ensure proper control and registration of radioactive discharges, the discharge of radioactive liquid effluents is done as follows:

- Before emptying a tank into the cooling water canal of the condenser, the tank content is recirculated to ensure good homogenisation and a representative sample is taken to be measured in laboratory and determine the content of gamma and tritium radioactivity.
- Depending on results, the shift leader dispatcher authorises the discharge, or the water is decontaminated.

During the discharge, the Liquid Effluent Monitor (LEM) monitors the global gamma activity that is discharged and stops the discharge in the event of an unexpected high activity.

Approximately 1,400 samples of water discharged from the plant are measured in the plant's Dosimetry Laboratory. The radioactivity monitoring results are centralised weekly and compared against the documentary limits of Cernavoda NPP and the committed environmental objectives.

In all years of commercial operation (26 years for U1 and 15 years for U2), the discharges of radioactive liquid effluents have been lower than the Derived Discharge Limit approved by authorities and stayed below the limits set out in the environmental objectives of Cernavoda NPP thanks to implementation of the Environmental Management System.

#### Non-radioactive emissions – Pitesti NFP

Non-radioactive atmospheric emissions come from:

- total particulate matters, nitrogen oxides, hydrochloric acid – released and monitored via the Dispersion Stack no. 1 (NO<sub>x</sub> result from the Chemical Analysis Laboratory)
- total particulate matters, beryllium, acetone – discharged and monitored via the Dispersion Stack no. 2 and the Ventilation System related to Hall IV and Outbuildings
- airborne beryllium powders/beryllium aerosols – released and monitored via the air ventilation plant related to the beryllium work area

The monitoring of non-radioactive NO<sub>x</sub> is carried out every six months by external RENAR accredited providers, which after the measurements are performed, send the analysis reports to Pitesti NFP. The values mentioned in these reports are included in the reports to the authorities in accordance with the requirements of the Environmental Permit.

Determinations of non-radioactive pollutants are carried out every six months by authorised providers, under services contracts. The values recorded for various emissions through the stacks of Pitesti NFP in years 2022 – 2025 are shown in the tables below.

	2024		2025		Limits set out under the legislation (MAPPM Order no. 462/1993)	
	H1	H2	H1	H2		
<b>Pitesti NFP</b>						
Alert threshold (PA)	Limit value (LV)					
NO <sub>2</sub> [mg/m <sup>3</sup> ]	88.55	2.05	2.05	2.05	350 mg/m <sup>3</sup>	500 mg/m <sup>3</sup>
NO <sub>2</sub> [t/year]	0.71		0.03	0.03	7.8 t/year	
Particular matters [mg/Nm <sup>3</sup> ]	4.03	4.67	3.02	2.04	35 mg/m <sup>3</sup>	50 mg/m <sup>3</sup>
HCl [mg/Nm <sup>3</sup> ]	3.5	3.5	3.5	3.5	21 mg/m <sup>3</sup>	30 mg/m <sup>3</sup>
Particular matters [mg/Nm <sup>3</sup> ]	3.4	2.28	2.98	2.37	35 mg/m <sup>3</sup>	50 mg/m <sup>3</sup>
Acetone [mg/Nm <sup>3</sup> ]	0.03402	0.00293	0.00257	1	105 mg/m <sup>3</sup>	150 mg/m <sup>3</sup>
Acetone [t/year]	0.0001		0.0035		1.0488 t/year	
Isopropyl alcohol [mg/Nm <sup>3</sup> ]	0.01760	0.01507	0.00134	1	105 mg/m <sup>3</sup>	150 mg/m <sup>3</sup>
Isopropyl alcohol [t/year]	0.0001		0.0035		1.0488 t/year	
Beryllium [mg/m <sup>3</sup> ]	0.000059	0.000040	0.000049	0.000011	0.01 mg/m <sup>3</sup>	0.1 mg/m <sup>3</sup>
Beryllium [t/year]	3,46*10 <sup>-7</sup>		2,09*10 <sup>-7</sup>		1.07502 t/year	
SO <sub>x</sub>	0		0	0		
Beryllium [mg/m <sup>3</sup> ]	0.00006	0.000049	0.000054	0.000012	0.1 mg/m <sup>3</sup>	0.1 mg/m <sup>3</sup>
Beryllium [t/year]	3,58*10 <sup>-7</sup>		2,36*10 <sup>-7</sup>		7,17*10 <sup>-4</sup>	



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Supervision of the beryllium concentrate in the exterior air takes place through a beryllium sampling point (45) located outside the beryllium work area (Beryllium Deposit Area), for which chemical determinations are carried out in the NFP's Chemical Analysis Laboratory, and which is connected with the Central Aerosol Sampling System (SCPA).

The values recorded in 2025 are shown in table below:

Item no.	Month	Measured value [ $\mu\text{gBe}/\text{m}^3$ ] – 2024	Measured value [ $\mu\text{gBe}/\text{m}^3$ ] – 2025	Maximum permissible Be concentration limit [ $\mu\text{gBe}/\text{m}^3$ ]
1	January	0.00031	0.00037	0.009
2	February	0.00057	0.00030	
3	March	0.00085	0.00029	
4	April	0.00233	0.00042	
5	May	0.00139	0.00057	
6	June	0.00125	0.00089	
7	July	0.00105	0.00128	
8	August	0.00066	0.00074	
9	September	0.00029	0.00027	0,007*
10	October	0.00026	0.00026	
11	November	0.00028	0.00030	
12	December	0.00057	0.00076	

\*In 2024 and until September 2025, the maximum permissible limit of beryllium concentration was 0.009 [ $\mu\text{gBe}/\text{m}^3$ ]; thereafter, it was decreased to 0.007 [ $\mu\text{gBe}/\text{m}^3$ ].

### Radioactive emissions – Pitesti NFP

Radioactive emissions are monitored in accordance with the requirements of the Permits for performance of nuclear activities, issued by CNCAN, which requirements are also taken over in the revised Environmental Permit of Pitesti NFP, issued under the Government Decision no. 568/2023 amending the Annex to the Government Decision no. 24/2019. Pitesti NFP performs monitoring of air contamination in both the outdoor environment and the working environment.

- The monitoring of radioactive emissions at Pitesti NFP's dispersion stacks are measured by means of three radioactive gaseous effluent monitors, related to each dispersion stack, the data are transferred online, subsequently the amount of uranium discharged is calculated. The values are reported to the authorities. In addition, as a back – up solution, NFP monitors emissions at the three dispersion stacks via the Isokinetic Stack Sampling System. The isokinetic stack sampling system is composed of four sampling lines (one for uranium – dispersion stack no. 1; one for uranium and one for beryllium – dispersion stack no. 3, and one sampling line for uranium at dispersion stack no. 3)
- Water consumption is measured by direct reading
- Soil monitoring is performed biannually, annually in accordance with the requirements of the Environmental Permit of Pitesti NFP, by laboratories notified by CNCAN, based on a service agreement. Results recorded in test reports/analysis reports are entered in an electronic register (excel) and reported to the authorities.



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The key radioactive pollutants are uranium airborne dusts (radioactive aerosols).

The release of radioactive gaseous effluents from the ventilation systems takes place via three dispersion stacks (Stack 1, Stack 2 and Stack 3); a Radioactive Gaseous Effluent Monitors (GEMs) is fitted to each stack to make continuous measurements and submit them online. The data collected via the three GEMs are transferred electronically to a dedicated computer in the Staff Radiation Protection and Dosimetry Laboratory (SRPDL). In order to avoid the release of uranium into the environment above the authorised limit, an administrative control limit was set below the alert threshold. These monitoring systems feature an acoustic and visual alarm system, so that when the alarm value reaches the administrative control limit, measures can be taken to avoid the release of large amounts of radioactive pollutants into the environment. The recorded data is processed and reported to the authorities, as required under the Environmental Permit.

According to the permits issued by CNCAN, Pitesti NFP is under the obligation to conduct maintenance and check calibration of this equipment with a CNCAN – authorised service provider. Thus, Pitesti NFP ensures the smooth operation of this equipment under services contract for corrective and preventive maintenance services and spare parts.

The frequency of the preventive maintenance sessions and the calibration checks is set out in the equipment user manual supplied by the manufacturer.

All three dispersion stacks are also equipped with a Stack Isokinetic Sampling System (SISS). A SISS consists of:

- Three isokinetic sampling units for uranium gas and powder sampling;
- one isokinetic sampling unit for beryllium gas and powder sampling;
- one control unit that manages sampling for all four sampling units.

The samples taken through SISS are analysed on a monthly basis in the Chemical Analysis Laboratory of Pitesti NFP. SISS is used to conduct monthly monitoring of the amount of uranium discharged through the three dispersion stacks, as well as the monthly amount of beryllium discharged through the 2nd dispersion stack.

The values recorded for the quantity of uranium discharged with the gaseous radioactive effluents, the volume of gaseous radioactive effluents discharged, and the maximum concentration of natural uranium in the gaseous effluents emitted, as well as the limits set under the permits held by Pitesti NFP are shown in the following table:

	2024	2025	Limit according to the Production Permit issued by CNCAN and to the Environmental Permit
<b>Amount of uranium removed through radioactive gaseous effluents</b>	0.548	0.434	5 kg/year
<b>Volume of radioactive gaseous effluents removed in 2024</b>	0,753*10 <sup>9</sup>	0,762*10 <sup>9</sup>	1*10 <sup>9</sup> m <sup>3</sup>
<b>Maximum concentration of natural uranium in the emitted gaseous effluents</b>	0.729	0.570	5 [µgU/m <sup>3</sup> ]

For 2025, NFP assessed of the maximum dose that can be received by a person representative for the population, as a result of the activities carried out by Pitesti NFP, on the shared ICN – NFP platform.

Two critical groups were determined for assessment of the doses received by population, namely:

- Group 1: the Guard and Protection Group of the Romanian Gendarmerie, positioned at the platform access gate, about 400 meters from NFP;
- Group 2: the group of population most exposed to radioactive gaseous effluents emitted by the nuclear facilities on the ICN – NFP platform, consisting of individuals living in houses on the ESE edge of Town of Mioveni, located about 1 km W – NW of the ICN platform.



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The 2025 assessment results show that the estimated doses for the two groups are:

- 0.42 µSv/year for Group 1
- 0.59 µSv/year for Group 2

The estimated values are well below the dose constraint set for Pitesti NFP, i.e. 10 µSv/year, for radioactive gaseous effluents.

Note: The dose constraint imposed for population by CNCAN, as resulting from the activities carried out on the shared ICN – NFP platform is 0.1 mSv/year (100 µSv/year) of which Pitesti NFP allocated 10 µSv/year to radioactive gaseous effluents.

In 2025, NFP set a performance indicator concerning *reduction of the amount of uranium released into the atmosphere through radioactive gaseous effluents, by reference to the number of fuel bundles produced, i.e. a maximum of 62.5 mgU/FB (15% of the amount of uranium authorised to be released through radioactive gaseous effluents according to the environmental permit, by reference to maximum authorised output).*

Amount of uranium removed through radioactive gaseous effluents at the dispersion stacks of Pitesti NFP, by reference to the number of nuclear fuel bundles produced

	2024	2025
Amount of uranium removed – cumulative for the three dispersion stacks [mgU/year]	548,378	434,311
Number of nuclear fuel bundles produced	11,019	11,118
Ration between the quantity of uranium released through radioactive gaseous effluents and the number of nuclear fuel bundles produced	49.77	39.06

### Radioactive monitoring of the external environment Pitesti NFP

Supervision of the exterior air radioactivity takes place through 6 sampling uranium connected to the Central Aerosol Sampling System (SCPA), namely points 1, 3, 17, 34 and 42, located outside Halls I, II and III, and point 44 located outside Extension of Hall V – pellet sheath – loading), for which radiometric measurements are made in the Staff Radiation Protection and Dosimetry Laboratory of NFP.

As to the proper functioning of the Central Aerosol Sampling System, it can be stated that:

- The sampling flow rates are checked quarterly according to NFP internal procedures, using a metrologically – verified air flow calibrator. In addition, the sampling rates are checked daily by the staff of the Staff Radiation Protection and Dosimetry Laboratory.
- The manovacuummeter connected to the aerosol sampling pump is metrologically checked every year in the Metrology Laboratory of Pitesti NFP.
- The Central Aerosol Sampling System is included in the list of checks/maintenance operations prepared annually by NFP. These activities are carried out by the staff of the Mechanical, Energy and Utilities Section.



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Maximum measured values for radioactive concentration of exterior environment air in years 2022 – 2025:

	Maximum measured value 2024 [Bq/m <sup>3</sup> ]	Maximum measured value 2025 [Bq/m <sup>3</sup> ]
Sampling point – 1	0.019	0.021
Sampling point – 3	0.030	0.017
Sampling point – 17	0.018	0.018
Sampling point – 34	0.027	0.019
Sampling point – 42	0.020	0.015
Sampling point – 44	0.023	0.021
<b>Administrative control limit [Bq/m<sup>3</sup>]</b>	<b>0.08</b>	<b>0.08</b>

#### Dose rates – Pitesti NFP

Since 2010, in order to improve the environmental radioactivity monitoring, Pitesti NFP has introduced a new quality parameter for air radioactivity by measuring the gamma dose rate at the site boundary. The points where gamma dose rate measurements are performed were set 1 m away from the soil surface, were located, for guidance, along the perimeter fencing of Pitesti NFP. Measurements are carried out weekly (each time at the same set points), with hand – held, metrologically checked equipment from the Staff Radiation Protection and Dosimetry Laboratory.

Measured values for dose rate in years 2022 – 2025

	Average value 2024 [μSv/h]	Average value 2025 [μSv/h]
Point V1	0.1351	0.1472
Point V2	0.1683	0.1687
Point V3	0.2057	0.2213
Point V4	0.1732	0.1683
Point V5	0.4279	0.4477
Point V6	0.2860	0.3047
Point V7	0.1696	0.1664
Point V8	0.1496	0.1477
Point V9	0.1453	0.1485
Point V10	0.1385	0.1504
<b>Population dose limit</b>	<b>1 μSv/h</b>	<b>1μSv/h</b>

#### Dose monitoring at perimeter fence – Pitesti NFP

To measure the ambient gamma dose at the site boundary (perimeter fencing), Pitesti NFP defined 10 measurement points, for which it uses 10 dosimeters. Measurements are made by the laboratory notified to CNCAN for this type of measurements.

Measured values for monthly average doses in years 2021 – 2024

	2024 [μSv]	2025 [μSv]
<b>Gate 1 NFP</b>	112.5	114.2
<b>REMAT Platform</b>	144.2	135.0
<b>TSP Platform</b>	195.8	175.8
<b>Mechanic Processing Hall</b>	113.3	118.3
<b>KMP – A Warehouse</b>	185	190.0
<b>KMP – C Warehouse</b>	172.5	179.2
<b>Compressor station</b>	112.5	106.7
<b>Gate 2 NFP</b>	107.5	115.0
<b>Hall IV – punching</b>	109.2	120.0
<b>Outside NFP SCPA point</b>	109.2	112.5
<b>LCA</b>	<b>LCA=1μSv/h (720 μSv/month)</b>	<b>LCA=1μSv/h (720 μSv/month)</b>



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The main objective of the radiation exposure control process is to keep exposures as low as reasonably achievable (the ALARA principle), thus guaranteeing a low impact on the environment and safety of the population health

### Air monitoring in the working environment Pitesti NFP

#### Radioactive emissions for Pitesti NFP:

Airborne uranium powders/uranium aerosols in work environment. Monitoring is performed through air sampling devices to control the uranium radioactive concentration in air (Central Aerosol Sampling System). Sample measurement for radioactive NOx is performed with the automatic counting system, according to the procedure *Sample measurement with the TENNELEC (TENNELEC LB – 5SE) automatic counting system*, or with the EBERLINE SAC – 4 and RaDEye HEC hand – held counters, according to the procedure *Uranium smear sampling and measurement of samples with the EBERLINE SAC – 4 hand – held counter and the procedure Sample measurement with the hand – held sample counter, Model RADEYE HEC*. Values are entered into the (computer) database and in the measurement records. The equipment listed above are metrologically – checked by authorised operators.

#### Non-radioactive emissions

- Beryllium aerosols – through the sampling points connected to the Central Aerosol Sampling System, the beryllium content on filters is determined with physical and chemical methods in the NFP Chemical Analysis Laboratory.

- NOx determinations – measurements are performed annually with accredited operators, under service contracts.
- Collective doses and maximum individual doses

#### ALARA indicators – Pitesti NFP

Developments in collective doses and ALARA performance indicators – NFP

	2024	2025
Collective dose [0m mSv]	481.62	482.025
Internal collective dose [0m mSv]	39.653	32.048
Contribution of internal dose to total dose (%)	8.23	6.65
Maximum individual dose [mSv/year]	9.258	8.818
Medium dose (Collective dose / No. of persons exposed) [mSv/year]	1.261	1.282

ALARA indicator	Measurement unit	Value
Maximum legal limit for individual dose	mSv/year	20
Maximum documentary limit for individual dose	mSv/year	15

#### Radioactive wastewater monitoring – Pitesti NFP

Manufacture of CANDU-6 nuclear fuel can result into wastewater that can be treated as radioactive wastewater or radioactive liquid waste, which is managed as follows:

- Radioactive liquid waste comes mainly from Halls I, II and III, further to technological processes and decontamination operations, as well as from chemical analysis laboratories. This waste is collected at the Radioactive Liquid Waste Collection Station and is managed in accordance with the requirements of the procedure *“Collection and Shipment of Radioactive Liquid Waste from NFP”*. Radioactive liquid waste with a concentration of maximum 2 mg U/L is transferred to the Wastewater Collection and Discharge Station, and that above this concentration is transferred to the STDR – ICN for treatment and recovery of uranium as solid uranyl hydroxide and return to NFP.
- Radioactive wastewater is collected in the Radioactive Water Collection and Discharge Plant, and is controlled discharged into RATEN – ICN Pitesti Treatment Plant, after having performed analyses to determine that the limits set in the Pitesti NFP revised Environmental Permit are observed. Radioactive wastewater collection and discharge is an activity covered by the procedure *Collection, storage, analysis and disposal of radioactive wastewater*.



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Quantities of radioactive wastewater discharged, i.e. quantities of radioactive liquid waste generated, as well as the limits set out in the NFP licenses – period 2022 – 2025.

	2024	2025	Limit under the environmental permit [m³]
Quantities of radioactive wastewater discharged by NFP in the TP of RATEN – ICN [m³]	550	650	2,000
Amount of liquid radioactive waste transferred to the Radioactive Liquid Waste Treatment Plant [m³]	230	250	800

### FPCU Feldioara

Radioactive emissions are monitored in accordance with the requirements of the Permits for performance of nuclear activities, issued by CNCAN, which requirements are also taken over in the Environmental Permit. FPCU Feldioara SRL performs monitoring of air contamination in both the outdoor environment and the working environment.

The key radioactive pollutants are uranium airborne dusts (radioactive aerosols). The release of radioactive gaseous effluents from the ventilation systems takes place via six dispersion stacks. In order to avoid the release of uranium into the environment above the authorised limit, an administrative control limit was set below the alert threshold.

The recorded data is processed and reported to the authorities, as required under the Environmental Permit.

According to the permits issued by CNCAN, FPCU Feldioara SRL is under the obligation to conduct maintenance and check calibration of this equipment with a CNCAN – authorised service provider. Thus, FPCU Feldioara SRL ensures the smooth operation of this equipment under services contract for corrective and preventive maintenance services and spare parts.

### Dose rates – FPCU Feldioara

In order to improve the environmental radioactivity monitoring, FPCU Feldioara SRL identifies the quality parameter for air radioactivity by measuring the gamma dose rate at the boundary of the monitored area in the four cardinal points. The points where gamma dose rate measurements are performed were set 1 m away from the soil surface. Measurements are carried out monthly (each time at the same set points), with hand – held, metrologically checked equipment from the Environment and Radiation Protection Laboratory.

The main objective of the radiation exposure control process is to keep exposures as low as reasonably achievable (the ALARA principle), thus guaranteeing a low impact on the environment and safety of the population health.

### Air monitoring in the work environment FPCU Feldioara

#### Radioactive emissions:

Airborne uranium powders/uranium aerosols monitoring is performed through air sampling devices to control the

uranium radioactive concentration in air. The equipment listed above are metrologically – checked by authorised operators.

Reports on each pollutant that was set a limit under the regulatory documents issued are submitted on a monthly basis to the environmental authorities.

The indicator “Water polluters meet the limits under the Water Management Permit (%)” is calculated monthly and annually; for this, limits set out in the permit are not exceeded.

The Environment Protection Environment Lab and Radioprotection Service prepares and submits regular reports on the developments observed in collective doses and ALARA performance indicators, thus increasing the engagement of the staff in the control and optimisation of the occupational exposure to ionising radiation. How these objectives are attained is tracked via ALARA process, and the ALARA committees operate with excellent results.

### Radioactive wastewater monitoring – FPCU Feldioara

The radioactive wastewater undergoes a treatment process through the metal recovery plant in order to fit within the radioactive parameters (uranium and radium) imposed by the CNCAN authorisations. Then, it enters the final treatment plant M4, which after the treatment process (four stages of reverse osmosis) meet the physico – chemical parameters required by the water authorisation to be discharged into the natural emissary Olt. Discharged water is monitored daily by the unit and periodically by DJM and SGA Brasov. The amount of electricity purchased in 2025 was 85,400 cubic meters.



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## SNN Group Pollution

Substances raising  
concerns and  
substances raising  
particular concerns  
(hazardous and very  
hazardous substances)  
| E2-5



The SNN Group pays great importance to implementation of all necessary measures to prevent major accidents involving dangerous substances.

### Use of chemicals of concern – Cernavoda NPP

Cernavoda NPP uses substances and mixtures of concern for the chemical control of the fluids in the power plant's circuits and equipment, for maintenance and repair purposes, for laboratory analyses and in activities/services implementing the changes/projects developed on site.

Procedures for the management of chemical substances are devised and approved at the site level, ensuring rigorous quantitative and qualitative control, and appropriate monitoring and reporting to the relevant authorities.

The chemical products purchased directly or under services contracts and used in the activities of Cernavoda NPP are classified, packaged and labelled according to the legal requirements in force REACH Regulation, CLP Regulation, etc.). Also, the biocidal products acquired directly or under services contracts are also accompanied by the Clearances issued by the Ministry of Health in accordance with the legislation in force, are quantitatively

and qualitatively monitored under the same conditions as those laid down in the procedures of Cernavoda NPP, and are reported on in accordance with the requirements and limits of the environmental permits.

All chemicals used in the site activities are assessed/ cleared and included in the List of Approved Chemicals; any product not appearing on this list shall not be used. The Safety Data Sheet of the products concerned are enclosed to any work package or work plan which use substances or mixtures. Also, for the activities where certain substances or dangerous mixtures are used in large quantities, an initial training is delivered to the staff who are to carry out the (Pre – Work Preliminary Training (IPEL), and who are thus presented the hazards and adequate measures in case of accidental leaks.

The emergency procedures under the Site Emergency Plan feature actions in case of leakages or contamination with dangerous chemicals, as well as procedures that regulate the flow for advising the authorities of reportable events. No reportable events impacting the environment and the population have been observed.



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Summary table – Use of chemicals of concern – CERNAVODA NPP – 2024

Item no.	Name	Code INDEX	CAS No.	Classification	2024 Utilisation	2025 Utilisation
1	4 – METHYLAMINOPHENOL SULPHATE (Metol)	650-031-00-4	55-55-0	H302 H373 H317 H400 H410	0.3 kg	0.3 kg
2	ACETONE min. 99.5%	606-001-00-8	67-64-1	H225 H319 H336 EUH066	3.95 kg	4 kg
3	NITRIC ACID min. 65%	007-004-00-1	7697-37-2	H272 H314 H290	11.12 kg	8.97 kg
4	HYDROCHLORIC ACID solution 37% and 32% chemical reagent	017-002-01-x	7647-01-0	H314 H335 H290	494,664.81 kg	371.3 kg
5	PHOSPHORIC ACID, min 85% (Orthophosphoric acid)	015-011-00-6	7664-38-2	H314 H290	7.91 kg	10 kg
6	SULFURIC ACID (electrolyte 37% and 97%)		7664-93-9	H290 H314	30.82 kg	28 kg
7	AMMONIA solution 32% + 25%	007-001-01-2	1336-21-6	H290 H314 H335 H400	18.7 kg	1.2 kg
8	BORIC ANHYDRIDE (Boron trioxide)	005-008-00-8	1303-86-2	H360FD	0	0
9	SODIUM NITRITE	007-010-00-4	7632-00-0	H272 H301 H400	0	2.96 kg
10	SODIUM CARBONATE anhydrous	011-005-00-2	497-19-8	H319	0.2 kg	1.7 kg
11	LITHIUM CARBONATE minimum 99%	without	554-13-2	H302 H319	0	0.48 kg
12	CHLOROFORM (Trichloromethane min. 99%)	602-006-00-4	67-66-3	H351 H302 H315 H373	9.8 kg	13.98 kg
13	AMMONIUM CHLORIDE 99.5%	017-014-00-8	12125-02-9	H302 H319	0	0.46 kg
14	Cobalt (II) chloride hexahydrate	027-004-00-5	7791-13-1	H350i H341 H360F H334 H317 H400 H410	0	0
15	SODIUM DICHROMATE DIHYDRATE	024-004-01-4	7789-12-0	H272 H350 H340 H360FD H330 H312 H372 H301 H314 H334 H317 H400 H410	0	0
16	DIIZOPROPYLAMINE min. 99%	612-129-00-5	108-18-9	H225 H332 H302 H314	25.81 kg	84.81 kg + 4.8 L



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Item no.	Name	Code INDEX	CAS No.	Classification	2024 Utilisation	2025 Utilisation
17	SODIUM DISULFITE (Sodium Metabisulphite)	016-063-00-2	7681-57-4	H302 H318	3 kg	4.7 kg
18	ETHANOL min. 96% (absolute ethyl alcohol)	603-002-00-5	64-17-5	H225	0	2.2 kg
19	SODIUM FLUORIDE	009-004-00-7	7681-49-4	H301 H315 H319	0.05 kg	0.006 kg
20	HEXAMETHYLENTETRAAMINE, minimum 99% or Urotropine	612-101-00-2	100-97-0	H228 H317	1 kg	1.8 kg
21	HYDRAZINE 35% aqueous solution (Hydrazine hydrate 55%)	007-008-00-3	302-01-2	H226 H350 H331 H311 H301 H314 H317 H400 H410	5000 kg	4,835.73 kg
22	SODIUM HYDROXIDE (liquid 100% + pellets, min. 98%)	011-002-00-6	1310-73-2	H314 H290	89,912 kg	87,879.77 kg
23	MORPHOLINE 100% solution – for conditioning in closed classical systems	613-028-00-9	110-91-8	H226 H302 H311 H332 H314 H318	18,060 kg	20,150 kg
24	POTASSIUM PERMANGANATE min. 99%	025-002-00-9	7722-64-7	H272 H302 H400 H410	0.0016 kg	1.0016 kg + 100 ml
25	PROPANE – 2 – OL (isopropyl alcohol)	603-117-00-0	67-63-0	H225 H319 H336	3.95	29.66 kg
26	TIMOL extra pure min. 99%	604-032-00-1	89-83-8	H302 H314 H411	0	1.1 kg
27	TOLUENE min. 99.5% (methylbenzene)	601-021-00-3	108-88-3	H225 H361d H304 H373 H315 H336	44.1 kg	149.5 kg
28	Hydrazine sulphate (laboratory reagent)	007-014-00-6	10034-93-2	H350 H331 H311 H301 H317 H400 H401	0.416 kg	0.487 kg
29	FERRIC CHLORIDE		7705-08-0	H302 H315 H317 H318	27,592 kg	53,321.24 kg
30	HYDROFLUORIC ACID 40%	009-003-00-1	7664-39-3	H300 H310 H330 H314 H318	0	0
31	CITRIC ACID		77-92-9	H319	1 kg	0 kg
32	PHENOLPHTHALEIN	604-076-00-1	77-09-8	H350 H341 361 F	0.0972 kg	0.0972 kg



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Item no.	Name	Code INDEX	CAS No.	Classification	2024 Utilisation	2025 Utilisation
33	AMINOSULFONIC ACID	016-026-00-0	5329-14-6	H315 H319 H412	0	0.040 kg
34	Methanol	603-001-00-X	67-56-1	H225 H331+H311+H301 H370	0.792 kg	1 kg
35	POTASSIUM HYDROXIDE	019-002-00-8	1310-58-3	H302 H314 H318	0	2 kg
36	CHLORINE (LIQUEFIED GAS)	017-001-00-7	7782-50-5	H270 H280 H315 H319 H331 H335 H400	137.08 kg	0
37	CHLORINE TABLETS and CLOROM	613-030-01-7	51580-86-0	H302, H319, H335, H400, H410, EUH031	0	0
38	HYDROGEN PEROXIDE 10% + HYDROGEN PEROXIDE 30%	008-003-00-9	7722-84-1	H318 H302 H332	19,680 kg	20,180 kg
39	AMMONIUM OXALATE	607-007-00-3	6009-70-7	H312 H302	0.75 Kg	5 Kg
40	METHYL ORANGE		547-58-0	H301	0	0.0008
41	IRON SULPHATE II		7782-63-0	H302 H315 H319 P302 P352 P305 P351 P338	0	2
42	BORIC ACID	005-007-00-2	10043-35-3	H360FD	0.5 kg	1.5 kg
43	SODIUM NITRATE 99.5%		7631-99-4	H302 H272	0	0.05
44	SODIUM OXALATE 99.5%	607-007-00-3	62-76-0	H302 H312	1 kg	2.5 kg
45	LITHIUM HYDROXIDE 98% solid		1310-65-2	H301 H314	9 kg	14.8 kg
46	SODIUM TETRABORATE DECAHYDRATE for pH buffer, Merck 101964		1303-96-4	H319 H360FD	0	0
47	CALCIUM HYDROXIDE for pH buffer		1305-62-0	H318 H315 H335	1 kg	0 kg
48	POTASSIUM TETRAOXALATE DIHYDRATE for pH buffer solution		6100-20-5	H302 H312	0.03 kg	0 kg



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Item no.	Name	Code INDEX	CAS No.	Classification	2024 Utilisation	2025 Utilisation
49	Ammonium thiocyanate	615-004-00-3	1762-95-4	H332 H302 H312 H412 P273 P302 P352	0	2 kg
50	Hydroquinone	604-005-00-4	123-31-9	H302 H351 H341 H318 H317 H400 P273 P280 P308 P313 P305 P351 P338 P302 P352	0	0
51	Nickel chloride II	028-011-00-6	7718-54-9	P201 P273 P280 P302 P352 P304 P340 P308 P310	0	0
52	Barium chloride dihydrate	056-004-00-8	10361-37-2	H332 H331	0	0
53	Manganese chloride (II)		13446-34-9	H302 H411 P237	0	0
54	Diammonium hydrogen phosphate		7783-28-0		0	0
55	Ascorbic acid		50-81-7		1 kg	1.46 kg
56	Last Gold		386440-62-9	H304 H318 H410	833 kg	674.5 kg
57	Acetylene instrumental purity min. 99.6%	601-015-00-0	74-86-2	H220 H28; H230	202 kg	130 kg
58	Strontium nitrate		10042-76-9	H272	0	0
59	Hydrogen	001-001-00-9	1333-74-0	H220	706.53	0.8 kg + 11,475 cm
60	Oxygen	008-001-00-8	7782-44-7	H270	412.32 kg	0 kg
61	SODIUM CHLORATE	017-005-00-9	7775-09-9	H271 H302 H411	0	0
62	POTASSIUM NITRATE min. 99%		7757-79-1		0	0
63	Argon – methane mixture (P10 mixture)			H221 H280	7,890.64 m <sup>3</sup>	7,890.64 m <sup>3</sup>
64	Diesel		68334-30-5	H226 H315 H332 H304 H351 H373 H411	294,080 kg	294,873.36 kg



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Item no.	Name	Code INDEX	CAS No.	Classification	2024 Utilisation	2025 Utilisation
65	Liquid fuel for combustion chambers (CLU)			H226 H304 H315 H332 H350 H361 H373 H411	20,000 kg	29,000 kg
66	WHITE – SPIRIT REFINED or WSX – LA THINNER			H304 H411 H226 H372 H336	502 kg	502 kg
67	CHLORINE liquefied gas		7782-50-5	H331 H400 H319 H280 H270 H315 H335	247.08 kg	247.08 kg
68	BIOCIDE ARQUAD MCB – 50			H302 H314 H318 H400 H410	18,000 kg	18,000 kg
69	FYRQUEL EHC PLUS (FRF Plus) fire retardant hydraulic fluid		68937-40-6		973.44 kg	973.44 kg
70	GADOLINIUM NITRATE hexahydrate 99.9%		10168-81-7	H318 H272	68.8 kg	71.3 kg
71	Nitrite corrosion inhibitor for closed systems RGCC – 100			H301 H319 H400	25 kg	25 kg
72	Liquid Antifreeze Glycochol CT /CT Long Life TIP			H302 H373	8,116 kg	8,116 kg
73	REGAL EP 32 PREMIUM TURBINE OIL			H412	4.3 kg	4.3 kg
74	SODIUM HYPOCHLORITE min. 12.5%		7681-52-9	H400 H290 H314	220 kg	220 kg
75	Nitrogen		7727-37-9	H280	91,336.64 kg	91,336.64 kg
76	Helium		7440-59-7	H280	2,285.34 kg	2,285.34 kg
77	Carbon dioxide		124-38-9	H280	19,380 kg	19,380 kg
78	3 D TRASAR 3 DT149 Liquid Antiscalant (Nalco)			H319 H315	1,715 kg	4,170 kg
78	PRAESTOL A 3040 L flocculating agent			H317	360 kg	738 kg
80	Octadecylamine (for Unit 1 refurbishment)	612-282-00-8	124-30-1	H304 H315 H318 H373 H410	0	0



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### Use of chemicals of concern – Pitesti NFP

NFP is an end-user, and the substances and mixtures of concern purchased for use in the technological processes or in laboratory analyses are kept in their original packaging, and are stored depending on compatibility (compatibilities are determined by the staff of the chemical analysis laboratory) in warehouses with controlled access.

When preparing the documentation for acquisition of substances and mixtures of concern, the requirements concerning their classification, packaging and labelling under the Regulation (EC) no. 1907/2006, concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), as subsequently amended and supplemented, and the Regulation (EC) no. 1272/2008 on classification, labelling and packaging of substances and mixtures, as subsequently amended and supplemented.

The substances and mixtures of concern used in NFP are accompanied by Safety Data – Sheets, are kept in the manufacturer's packaging, and are subject to procedural requirements, that both at ordering and at taking – over, as well as during regular inspections, the integrity and tightness of the packaging, the correct labelling with information on the name of the product, the brand of the factory and the name of the manufacturer, the date of manufacture, and the warranty period are strictly monitored; all of this is data strictly needed for first aid in order to avoid chemical hazards, for removal of residual products and, where applicable, for application of restrictions on the use of the product. In the event of an accidental damage to the packaging, the chemical product is transferred to other containers compatible with its

characteristics, ensuring that these are clean so as not to contaminate the product, are properly labelled and meet any other specific requirements.

For the works carried out in Pitesti NFP, which use substances and mixtures of concern, these are accompanied by Safety Data – Sheets.

Following the Analysis on the applicability of the provisions of Law no. 278/2013 on industrial emissions, the activities that fall under Annex 1 have been identified within the NFP. Concerning the activities in which organic solvents are used (Annex 7 of the Law no. 278/2013) 2 activities were identified:

- Surface cleaning, an activity for which volatile organic compounds are used: acetone, ethyl alcohol, isopropyl alcohol
- Other coating, including coating of metals, plastics, textiles, fabrics, film and paper, activities for which volatile organic compounds are used: Isopropyl alcohol, Isopropyl alcohol in colloidal graphite solution, used in graphitisation

Following calculations of the quantities of solvents used, it was found that they are below the threshold values mentioned in the table in Part 2 of Annex 7.

### The environmental impact transport or use and disposal of products and services

Pitesti NFP carries out the following types of transport:

- Nuclear fuel bundles to/from Cernavoda NPP (Unit 1 and Unit 2)
- Sinterable UO2 powder from FPCU Feldioara to Pitesti NFP
- Noncompliant nuclear material from Pitesti NFP to FPCU Feldioara
- Solid radioactive waste contaminated with natural uranium from Pitesti NFP to the Final Landfill of Feldioara CNU Subsidiary
- Other transport authorised by CNCAN

The transport of radioactive materials takes place with authorised means of transport, and drivers certified to carry Class 7 hazardous goods.

For each transport of radioactive material, dosimetry measurements are performed both on the means of transport and on the attending staff, according to the Programme for protection against ionising radiation in transport of radioactive material. After each transport and transfer of radioactive materials, a report is prepared on how the transport and transfer took place, which is submitted to CNCAN.



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Table – List of substances and mixtures used by Pitesti NFP

Item no.	Name of substance/mixture	MU	Quantity used in 2024	Quantity used in 2025
1	Absolute methyl alcohol	L	4	3
2	Sodium hydroxide	kg	2	2
3	Hydrochloric acid 30% supra – pure	L	13	8
4	Hydrogen peroxide 30% p.a	L	6	4
5	Ortho – phosphoric acid 85%	L	2	10
6	Zirconium oxide	kg	113.5	22.7
7	Ethyl alcohol PA	L	880	816
8	Isopropyl alcohol P.A.	L	1,540	1,270
9	Glacial acetic acid	L	1	2
10	Citric acid	kg	175	125
11	Sulfuric acid 95 – 97% PA	L	7	9
12	Hydrochloric acid 32%	L	162	143
13	Formic acid	L	2	2
14	Hydrofluoric acid 40% PA, 1L	L	2	2
15	Nitric acid 69.5% supra – pure 1L	L	29	5
16	Nitric acid 65% pa 1L	L	32	30
17	Alaun Feriamoniacal PA	kg	0.1	0.1
18	Hydroxylamine hydrochloride 99% PA	kg	0.1	0.1
19	Ferrous sulphate heptahydrate 99.5% PA	kg	0.5	0.5
20	Acetone	L	583	506
21	Calcium chloride	kg	275	475
22	Perchloric acid 70%	L	1	1
23	Kerosene	L	7.5	7.5
24	Sodium hydroxide rotulis PA	kg	1	2
25	Zinc stearate	kg	623.7	601.02



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Item no.	Name of substance/mixture	MU	Quantity used in 2024	Quantity used in 2025
26	Beryllium	kg	8.29	6.69
27	Graphite Bonderite L – GP 154N ACHESON	kg	739.915	610.25
28	Hydranal	L	4	2
29	Tributylphosphate	L	6.5	6.5
30	Karl Fischer solution (1 ml – 5 mg H2O)	L	2	2
31	Nickel Accelerator	g	100	100
32	CRM zirconium (H – 10 ppm, N – 20 ppm)	g	10	10
33	CRM Hydrogen – 1 ppm	g	100	175
34	Standard for specific surface area $\alpha$ – alumina – 5.41 m <sup>2</sup> /g $\pm$ 0.04	g	25	25
35	CRM 123 – 1:123 – 7 (U308 standard with certified impurity concentrations)	g	100	100
36	CRM 129A (pure spectral U308 standard)	g	15	15
37	Standard carbon in steel	g	100	100
38	Tin flow	g	100	100
39	Standard solution pH 4	mL	500	500
40	Standard solution pH 7	mL	500	500
41	Standard solution pH 10	mL	500	500
42	pH – 9 buffer solution	ml	500	500
43	Standard solution for conductivity – 500 $\mu$ S/cm	ml	500	500
44	Standard solution for conductivity – 5 $\mu$ S/cm	L	0.5	0.5
45	Nessler reagent, solution B	ml	250	250
46	Sodium hexametaphosphate	Kg	0.5	0.5
47	Vanadyl sulphate	Kg	0.5	0.2
48	Sulfamic acid	Kg	0.5	0.2
49	Hydroxylamine hydrochloride	g	10	5
50	Orthophenanthroline hydrochloride	g	5	2



Informații cu caracter general



Schimbări climatice



**Poluarea**



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Biodiversitatea și ecosistemele



Resurse și Economia circulară



Forța de muncă proprie



Lucrătorii din lanțul valoric



Comunitățile afectate



Consumatorii și utilizatorii finali



Conduita Profesională



Securitate nucleară



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CUPRINS



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Item no.	Name of substance/mixture	MU	Quantity used in 2024	Quantity used in 2025
51	Fluoride ion standard solution for ion chromatographic analysis	ml	100	100
52	Chloride ion standard solution for ion chromatographic analysis	ml	100	100
53	Silver chloride	g	30	25
54	Gallium Fluoride	g	10	0
55	Sodium acetate anhydrous	g	50	50
56	Mercury	Kg	1	0.25
57	Ferrous sulphate heptahydrate	Kg	0.25	0.1
58	Reagent kit for the determination of total nitrogen in waters in the range 3.0 – 60.0 mg/L total N	pcs.	7	5
59	Reagent kit for the determination of total nitrogen in waters in the range 0.5 – 22.0 mg/L total N	pcs.	9	12
60	Reagent kit for the determination of total ortho- Phosphate and phosphorus in waters in the range 0.010 – 1.5 mg/L P	pcs.	1	2
61	Reagent kit for the determination of total phosphate and phosphorus in waters in the range 0.3 – 15 mg/L P	pcs.	5	2
62	Reagent kit for the determination of total ortho- Phosphate and phosphorus in waters in the range 0.2 – 5.0 mg/L P	pcs.	4	5
63	Silicon dioxide	g	100	200
64	Potassium chloride	g	50	50
65	Perchloric acid	L	1	0
66	Vanadyl sulphate 97%	L	0.5	0
67	Potassium nitrate	g	50	50
68	Potassium dichromate	g	10	10
69	Barium diphenylsulfonate	g	25	25
70	Molecular sieve	g	100	100
71	Spectral graphite powder	g	30	30
72	Copper oxide in wire form	g	10	10
73	Copper Oxide	g	50	50
74	*Mercury sulphocyanide	g	3	2
75	*Ammonium hydroxide	g	0.1	0.1



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Item no.	Name of substance/mixture	MU	Quantity used in 2024	Quantity used in 2025
76	*Alizarine	g	0.4	0.3
77	*Lanthanum trioxide	g	0.4	0.3
78	*Ammonium molybdate	g	50	50
79	*Ammonium metavanadate	g	10	10
80	*Ammonium chloride	g	10	10
81	Iron standard	mL	100	50
82	Sodium standard	mL	100	50
83	Silicon standard	mL	100	50
84	Magnesium standard	mL	100	50
85	Beryllium standard	mL	100	50
86	Boron standard	mL	100	50
87	Chrome standard	mL	100	50
88	Copper standard	mL	100	50
89	Gadolinium standard	mL	100	50
90	Manganese standard	mL	100	50
91	Nickel standard	mL	100	50
92	Phosphorus standard	mL	100	50
93	Titanium standard	mL	100	50
94	Dysprosium standard	mL	100	50
95	Gallium (III) Fluoride 99.995%	g	10	10
96	Silver chloride	g	30	25
97	PH solution 10.012	L	1	1
98	ZIRCONIUM PIN STD 0.1 GM H – 10ppm N – 20ppm,O – – 1490ppm 10G PN B 4261	g	20	20
99	NANO-CONTROL MULTI-STANDARD SOLUTION	Pcs.	5	2
100	COPPER METAL ACCELERATOR – C/S ANALYZER G4 ICARUS COD TS B1198	FI	1	0.7

\*Reagents used only in backup methods for chemical analysis



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FPCU Feldioara pays great importance to implementation of all necessary measures to prevent major accidents involving dangerous substances.

Procedures for the management of chemical substances are devised and approved at the site level, ensuring rigorous quantitative and qualitative control, and appropriate monitoring and reporting to the relevant authorities.

The chemical products purchased directly or under services contracts and used in the activities of FPCU Feldioara SRL are classified, packaged and labelled according to the legal requirements in force REACH Regulation, CLP Regulation, etc.).

Table – List of chemical substances used by FPCU Feldioara SRL

REAGENTS	INVENTORY	January 2024		TOTAL 2024		January 2025		Total 2025	
		Inflows	consumption	total inflows	total consumption	Inflows	consumption	total inflows	total consumption
Process nitric acid 100% (t)	26,608	28.02	42.44	531.30	554.38	0	0	458.840	454.280
Ammonia water (t)	35,056	0.00	4.51	77.48	96.55	0	0	145.300	133.900
Ammonia cp sol 25% (t)	20,200	0.00	13.48	285.40	300.35	0	0	262.330	261.380
Hydrochloric acid sol. 32% (t)	2,610	0.00	0.42	2.38	2.80	0	0	0	1.565
Sodium hydroxide (t)	0.00	0.00	0.09	0.00	0.56	-	-	-	-

The emergency procedures under the Site Emergency Plan feature actions in case of leakages or contamination with dangerous chemicals, as well as procedures that regulate the flow for advising the authorities of reportable events. No reportable events impacting the environment and the population have been observed.

#### The environmental impact transport or use and disposal of products and services

FPCU Feldioara carries out transports of sinterable UO2 powder samples from FPCU Feldioara to Pitesti NFP.

The transport of radioactive materials takes place with authorised means of transport, and drivers certified to carry hazardous goods.

For each transport of radioactive material, dosimetry measurements are performed both on the means of transport and on the attending staff, according to the Programme for protection against ionising radiation in transport of radioactive material. After each transport and transfer of radioactive materials, a report is prepared on how the transport and transfer took place, which is submitted to CNCAN.



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REAGENTS	INVENTORY	January 2024		TOTAL 2024		January 2025		Total 2025	
		Inflows	consumption	total inflows	total consumption	Inflows	consumption	total inflows	total consumption
Sodium carbonate (t)	128,040	0.00	4.51	0.00	<b>69.24</b>	0	0	0	38.250
Tributylphosphate (kg)	0.00	0.00	400.00	2,600.00	<b>1,200.00</b>	0	0	0	600.00
Kerosene (litres)	0.00	0.00	208.75	6,520.80	<b>2,248.00</b>	0	0	0	501.600
Flocculant FA 500 Ti(kg)	0.00	0.00	10.00	0.00	<b>130.05</b>	0	0	0	225.000
Liquid nitrogen (Nmc)	16,599.00	0.00	10,932.00	117,354.00	<b>133,726.00</b>	227.000		144,817.480	134,453.000
Clarcel (t)	0.00	0.00	0.40	0.00	<b>5.10</b>				
Sodium chloride (t) CT	0.00	0.00	4.20	120.00	<b>61.54</b>	0		0	38.180
Resin (mc) TC+Demi water	0.00	0.00	0.00	0.00	<b>0.00</b>	-	-	-	-
Sulfuric acid (t)	0.00	0.00	0.00	0.00	<b>0.00</b>	-	-	-	-
Sodium hypochlorite (t)	0.00	0.00	0.00	2.50	<b>1.05</b>	0	0	0	1.300
Sodium bisulphite sol. 24%(t)	0.00	0.00	0.00	0.00	<b>0.62</b>	-	-	-	-
Flocculant FLR 4525 (t)	0.00	0.00	0.00	0.00	<b>0.24</b>	-	-	-	-
Anti – scalant agent. ROSCAL 04 (t)	0.00	0.00	0.00	0.00	<b>0.35</b>	-	-	-	-



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## Grup SNN Poluarea



### Anticipated financial effects from pollution-related significant risks and opportunities | E2-6



No detailed quantification of the anticipated financial effects has been conducted in monetary terms, before considering the pollution-related actions. As part of the materiality assessment, the risks and opportunities identified were assessed to be of low materiality, between 4% and 16%, with a low likelihood of occurrence and without giving rise to any material financial effect for the SNN Group.

REAGENTS	INVENTORY	January 2024		TOTAL 2024		January 2025		Total 2025	
		Inflows	consumption	total inflows	total consumption	Inflows	consumption	total inflows	total consumption
Antiscalant CHEM AQUA 67037 or equivalent	0.00	0.00	0.00	50.00	0.00	0	0	0	2.000
Antiscalant CHEM AQUA 67032 or equivalent	0.00	0.00	0.00	250.00	0.00	0	0	4.000	3.000
Antiscalant CHEM AQUA 67704 or equivalent	0.00	0.00	0.00	50.00	0.00	0	0	0	2.000
BIOCIDE MB 215 or equivalent	0.00	0.00	0.00	50.00	0.00	0	0	0	0
Alkaliniser BP 800(I)	0.00	0.00	0.00	330.00	120.00	0	0	13.000	6.000

The subsidiaries EnergoNuclear and NucleaelectricaServ do not use any hazardous substances.

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# SNN Group ESRS E3 WATER AND MARINE RESOURCES



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## SNN Group Water and marine resources



Description of the processes pursued to identify and assess the water and marine resources-related material impacts, risks and opportunities | *IRO-1*



The water resources-related impacts, risks and opportunities are identified and assessed as part of the dual materiality assessment, in an internal workshop, as well as by consulting other literature sources, the risk registers and the stakeholders, as summarised in the table below and addressed in the following sections.

Scope	Topic	Sub-topic	Sub-sub-topic	Impact(s)
Environment (E)	Water and marine resources	Water	Water extraction	<b>Current, negative impact:</b> Water abstraction from the Danube-Black Sea Canal ( <i>Applicable to Cernavoda NPP</i> ) and wells ( <i>Applicable to FPCU Feldioara</i> ).
Environment (E)	Water and marine resources	Water	Water consumption	<b>Current, negative impact:</b> Operational consumption of domestic and process water ( <i>Applicable at Group level</i> )

The impact related to water abstraction is applicable only for Cernavoda NPP. A material risk was identified in connection with the exceeded heating limit of the Danube downstream, due to the use of water to cool down the plant, and with financial losses due to the shutdown of the Production Units. This risk also applies only for the entity Cernavoda NPP. Although the risk has been assessed as material, the impact caused on water due to the exceeded water heating limit of the Danube it is assessed as immaterial and with a low likelihood of occurrence.

Scope	Topic	Sub-topic	Sub-sub-topic	Risk/Opportunity
Environment (E)	Water and marine resources	Water	Discharges into surface water	<b>Risk:</b> financial losses due to the shutdown of production Units.

In 2025, the impacts, risks and opportunities related to consumers and end-users were reassessed against those identified in 2024. The impacts, risks and opportunities identified in the previous year were rewarded and specifically reclassified at an individual sub-sub-topic level for each matter. The impacts, risks and opportunities previously identified have been reworded where necessary for clarity, but there were also impacts, risks or opportunities newly identified on certain aspects. The analysis and reassessment identified relevant and material impacts only on the sub-sub-topics related to "Water abstraction" and "Water consumption". Moreover, a risk related to "Surface water spills" was assessed as material.



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## SNN Group Water and marine resources



### Policies related to water and marine resources | E3-1



The SNN Group has taken up the commitment to maintain the volume of radioactivity releases into water below the regulated levels; this is documented in both the Environmental Protection Policy and the Company's ESG Policy, a policy assumed by the SNN Group's management.

Also, under the integrated management systems and the water management permits, SNN Group takes up the responsibility to manage the water resources in a sustainable way, taking into account observance of certain water quality indicators and protection of the ecosystems and the human health.

Moreover, internally, a Water Management Policy has been devised in the SNN Group, whereby the Group takes up responsibility to make a sustainable use of water in all its operations, thereby ensuring an efficient consumption and minimising the environmental impact. This policy applies to all SNN entities according to the geographic and operational specificity of the sites in Cernavoda, Pitesti-Mioveni, Feldioara and Bucharest.

#### Policy objectives:

- Identificarea și evaluarea riscurilor climatice specifice fiecărei locații operaționale.
- Implementarea unor strategii eficiente de gestionare a apei.
- Asigurarea conformității cu standardele internaționale în domeniu.
- Formarea și informarea continuă a angajaților cu privire la bunele practici în gestionarea apei și adaptarea la schimbările climatice.

#### Owners of implementation of the Water Management Policy

- Head of Environmental Protection Service, Environmental Laboratory and Radiation Protection – Monitors the implementation of the policy.
- Site Managers – Apply measures specific to each unit.
- Internal Audit teams – Check whether the policy is complied with.

Through its water management policy, the SNN Group aims to provide its key stakeholders with:

- Annual training sessions for the operational staff.
- Specific training for the employees in charge of the water supply system maintenance activities
- Efficiency water use awareness campaigns.

#### Cernavoda NPP

Currently, Cernavoda NPP holds the Water Management Permit no. 72 of 6 September 2021, amending the Permit no. 58/01.07.2021 on Water Supply and Waste Water Discharge for U1 and U2 of Cernavoda NPP" (valid until 30 June 2026), issued by "Apele Romane" National Administration. Under this, Cernavoda NPP is authorised to use the Danube River water, via the Danube – Black Sea Canal, Reach I, as cooling water. A procedure for the evacuation of algae from the Screen House via the U1-U5 header, aimed at preventing the water discharge risk, it is currently being written, as well.

Also, under the Water Management permit no. 83/28.06.2024, issued by Dobrogea – Seashore Water Basin Administration for the Intermediary Spent Fuel Storage Facility (DICA) and valid until 30 June 2026,



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Cernavoda NPP has the right to use the hydraulic engineering structures and receptors to discharge the rainwater from the surface of the Intermediary Spent Fuel Storage Facility and to discharge the rainwater into Cismelei Valley; however, provided that the quality indicators related to the presence of radioactive elements observe the limits set by CNCAN.

Cernavoda NPP holds the Sanitary Operating Permit no. 103/09.05.2023, issued by the Public Health Directorate of Constanta, for FJ1, FJ2 drillings and the Treatment and Chlorination Stations; this permit must be applied a visa every year in order to prove that all conditions therein are met.

#### Pitesti NFP

Pitesti NFP does not hold a Water Management Permit because Pitesti NFP does not directly extract any water. (water is supplied by RATEN – ICN) and does not discharge wastewater into any emissary. The wastewater resulting from the activities carried out by Pitesti NFP is transferred to ICN Pitesti Wastewater Treatment Plant, and after treatment, this it is controlled discharged into the outlet.

The commitment to a rational use of resources, including water resources, was documented in the *Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety and health, control of nuclear guarantees, cyber security, and protection of classified information*, which is a document approved by Pitesti NFP Manager.

Under NFP's Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety and health, emergency situations, physical

protection, control of nuclear safeguards, cyber security, and protection of classified information, the ultimate responsibility to meet the commitments undertaken, including sustainable use of resources, lies with the Director.

Pitesti NFP is an EMAS – registered organisation, according to the requirements of Regulation (EC) no. 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco – management and audit scheme (EMAS) and the Regulation (EU) 2017/1505 of the Commission of 28 August 2017 amending Appendices I, II and III and Regulation no. 2018/2026. Thus, annually, the NFP has the obligation to establish key performance indicators (according to Annex IV of the Regulation), these indicators targeting the performance achieved in the following key environmental areas: energy efficiency; material efficiency; water; waste; biodiversity and emissions. Annual targets have been set for the reduction of water and energy consumption and the efficient use of resources by increasing the degree of processing.

Under the procedures in force, CN – MM – 02 and CN – MM – 06, an environmental analysis is prepared annual, and includes the following stages:

- Setting the organisational background;
- Stakeholder identification and determination of their relevant needs and expectations.
- Identification of the applicable legal environmental requirements;
- Identification of the direct and indirect environmental

matters related to all Pitesti NFP activities, taking into account the lifecycle outlooks of the nuclear fuel bundle (purchase of raw materials, production, transport/delivery, use and end – of – life treatment), and its impacts on the environment (actual and potential, beneficial and harmful);

- Definition of criteria for assessment of the importance of environmental matters, and identification of those environmental matters with a significant impact on the environment;
- Deep – dive into the environmental performance stemming from the specific NFP activities, and setting of the environmental objectives, indicators and targets;
- Determination of the measures needed to eliminate or minimise any adverse effect on the environment.

In this regard, Pitesti NFP envisages both reduction of the use of resource and aspects related to water pollution prevention and reduction.

Under NFP's Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety and health, emergency situations, physical protection, control of nuclear safeguards, cyber security, and protection of classified information, the ultimate responsibility to meet the commitments undertaken, including sustainable use of resources, lies with the Director of Pitesti NFP.



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### FPCU Feldioara

In the subsidiary FPCU Feldioara, there are no dedicated policies covering water resources, but the commitment to keep the volume of radioactivity releases into water below the regulated levels is provided in the regulatory documents held. FPCU Feldioara aligns to the Group-wide applicable policy.

FPCU Feldioara SRL is the beneficiary of water permit no. 115/04.09.2024 amended under no. 41/14.05.2025, which provides the conditions for managing the entire water use cycle (abstraction, use, storage, treatment, discharge).

### SNN Headquarters, EnergoNuclear and NuclearelectricaServ

These entities align with the SNN Group-wide policies that regulated the water resources, i.e., proper water consumption management.



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# SNN Group Water and marine resources



## Actions and resources related to water and marine resources | E3-2



The water resources-related actions are specific to each entity within the Group, and are aimed in particular at protecting the water sources. The water stress risk analysis was based on the “Environmental Report on the 2019-2030 National Strategy for the Prevention and Combating of Desertification and Land Degradation” Beneficiary: MMAP – the General Directorate for Forests and Forestry Strategies, which concluded that the Group’s entities were not placed in water stress risk areas.

### Cernavoda NPP

In order to protect the water sources, Cernavoda NPP permanently applies a series of technical and organisational measures:

#### 1. The routine physical and chemical monitoring programme for the non-radioactive liquid effluent is designed to meet the following objectives, under normal plant operating conditions:

- evidence compliance by Cernavoda NPP with the environmental permits;
- collect certain data, as needed to support an independent assessment, based on the physical and chemical analysis of the source control effectiveness, effluent control and non-radioactive liquid effluent monitoring.

This programme is carried out according to the Water Management Permits (WMPs) in force (the chemicals that can be discharged into water, the discharge routes, the maximum concentration permitted in the non-radioactive

liquid effluent are identified), and to the Protocol signed between Cernavoda NPP and the Dobrogea – Seashore Water Basin Administration of Constanta (identifies the physical and chemical parameters to be analysed, the analysis frequency, and the sampling points) with subsequently signed Addenda: Addendum no. 4973/15.03.2022 and Addendum no. 23893/29.11.2024

#### 2. Plants, systems and measures for water quality protection

*Radioactively – contaminated wastewater decontamination plant* – is intended to reduce radioactive contamination of radioactively – contaminated wastewater. Each of the U1 and U2 nuclear power units is equipped with a radioactively – contaminated water decontamination plant.

*The radioactively contaminated waste water collection system* – is designed to collect of all aqueous radioactive waste resulting from the power plant’s process systems and from maintenance, overhaul and decontamination operations, followed by discharge of the cooling water from condensers into the discharge canal, but ensuring compliance with the regulated limits for radioactive material concentrations when discharged into the emissary. It is found at each of the nuclear power units U1 and U2.

*Plant for neutralisation of the wastewater coming from the Water Chemical Treatment Plant (WTP)* – its role is to collect and neutralise the wastewater resulting from ionic resin regeneration in the demineralisation plant,



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equipment washing, floor washing, etc. and to ensure the transfer to the siphoning basin of neutralised water with a pH in the range of 6.5 ÷ 9.0.

**Other wastewater treatment and control plants:**

**Drainage systems** – intended to collect groundwater related to buildings with various functions:

- screening and external drainage – related to the main buildings of each unit;
- to the Spent Fuel Pool;
- to the Reactor Building;

**To the Intermediary Spent Fuel Storage;**

- to the non-radioactive waste collection centers;
- to the fuel station of the Start – Up Thermal Station;
- to the fuel station of the Back – Up Diesel Groups.

Cernavoda NPP’s current routine environmental monitoring programme also includes drinking water and rainwater sampling.

**3. Monitoring of radioactive liquid effluents – radiological pollutants.** According to the regulatory acts, in terms of radioactive contamination, before discharge, the beta and gamma activity of all water must be within the limits set by CNCAN. Radioactive monitoring is carried out according to the provisions of the licensing documents issued by the competent authority (CNCAN), throughout the service lifetime of the plant. The radioactivity in liquid effluents is measured by analysis of the samples from the Liquid Effluent Monitor (LEM). The Derived Emission Limits (DELs) for liquid discharges were calculated for each discharge route and each representative person of the population considered for liquid discharges into the Danube – Black Sea Canal and the Danube. The DELs of radioactive effluents in the environment are thus set so as to ensure that the dose constraints are met for the most exposed groups of individuals of the population (critical groups, i.e. adult and child 0 – 1 year old), with three different monitoring locations being set, depending on the two potential discharge routes:

- Discharges into the Danube – Black Sea Canal: Town of Cernavoda, located 2 km away from the plant, and City of Constanta (only for drinking water, because about 40% of its population is supplied drinking water from the CDMN.
- Discharges into the Danube: Locality of Seimenii Mari, located on the Danube bank, approx. 1 km downstream the discharge point of the condenser cooling water discharge channel into the Danube.

In addition to the annual emission limits, shorter – term DELs have been approved to monitor and optimise the













control of radioactive discharges: Quarterly DELs: 35% of annual and monthly DELs: 15% of annual DELs. Were short – term limits are exceeded, Cernavoda NPP is required to give notice CNCAN, to define the reasons that led to the increased discharges, and to put in place corrective measures to reduce the radioactive emissions.

For the discharge of liquid effluents into the Danube – Black Sea Canal, additional measures are implemented so that the radioactivity concentration in the canal water complies with the limits set under the drinking water legislation in force. The administrative and monitoring measures taken ensure compliance with the legal requirements for drinking water radioactivity ( 3 H concentration, overall alpha activity and overall beta activity). The plan of measures to limit the radioactivity concentration in the discharged water is presented to the authorities to obtain the discharge route switching permits.

Where, liquid effluents are discharged both into the Danube – Black Sea Canal and into the Danube during a given year, there is an additional condition that the sum of the doses received by a person of the critical group during that year, from these discharges, does not exceed 25 µSv. During the reporting period, there were no instances where the regulated parameters requiring remedial action were exceeded.

Also, Cernavoda NPP has in place measures to mitigate the risk related to the exceeded heating limit of the Danube downstream, due to the use of water to cool down the plant, which can cause the shutdown of the Production

Type of sample	Sampling frequency	Analysis frequency
Surface water	weekly	monthly
Water (CCW canal) (*)	weekly	weekly
Sweep water	monthly	monthly
Deep water table	monthly	monthly
Drinking water	monthly	monthly
Rainwater	depending on the weather conditions	depending on the sampling period

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Units and potential financial consequences. Risk mitigation measures:

- Monitoring the temperature of cooling water in the intake canal
- Organisation of the site cleaning activity under a continuous working regime (work in 24/24 shifts)
- Procedure for evacuation of algae from the Screen House via the U1 – U5 collector

### Pitesti NFP

Pitesti NFP is located in a hydrographic area with groundwater and deep water that ensures covers for the consumption of both the population and the local businesses. Considering that Pitesti NFP is not located in an area with a high risk of drought/hydric risk, no additional investments for water supply are required. Pitesti NFP is supplied with water by RATEN – ICN. Pitesti NFP does not carry out any water sampling.

Since Pitesti NFP is constantly concerned about environmental protection, use of resources, etc., under the *NFP Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety, emergencies and health, physical protection, control of nuclear safeguards, cyber security, and protection of classified information*, the NFP management committed to take all necessary measures for the *Monitoring, assessment and continuous improvement of the environmental performance, pollution prevention, sustainable use of resources and biodiversity conservation*.

Pitesti NFP does not discharge any water into any outlet. Waste water is collected in the two stations held by NFP:

- The Waste Water Collection and Discharge Station (SCEAR – NFP)
- The Radioactive Liquid Waste Collection Station (SCDLR – NFP).

Depending on the uranium concentration, these are discharged into Pitesti ICN Treatment Station (SE – ICN) as radioactive waste water or are transferred by road tanker to Pitesti ICN Radioactive Waste Treatment Station (STDR – ICN), as radioactive solid waste for treatment and uranium recovery.

In order to reduce the use of water, Pitesti NFP has taken a number of reduction measures along the years, namely:

- In order to reduce the consumption of domestic water, the measures consisted of delivering training to, and raising awareness of, the staff on the rational use of resources, replacement of water mixing units by new photocell – equipped ones, checking the water routes and replacement of those areas where wear and tear was observed.
- To reduce the industrial water consumption, two cooling water recirculation plants were put into operation.
- For the year 2025, Pitesti NFP has set a performance indicator in the field of environmental protection related to water consumption, defined as follows: reduce water consumption per unit by at least 0.1% in 2025, compared to 2024 (14.23 m3/employee in 2024). The indicator was in line with the proposed target, as a reduction in the unit consumption of water in 12.58% was reported compared to 2024.

*NFP progressively reduced the quantity of water used, In an analysis going back several years, a reduction in the water consumption was found from 7,868 m3 (amount recorded in 2020) down to 5,489 m3 (amount recorded in 2023), down to 5,010 m3 (amount recorded in 2024), and respectively down to 4,430 m3 in 2025.*

As NFP has gradually reduced the amount of water used by replacing the traditional mixers with sensor-operated mixers, replacing worn pipes, etc.), and currently there are no longer any identified areas where water consumption can be reduced. Thus, it implements actions related to the training and awareness – raising of the NFP staff and external staff performing activities/works on the platform, on the rational use of water resources.

Sources of waste water:

- Radioactive liquid waste – is radioactively contaminated waste water of different concentrations, coming from the production and quality control activity, and is collected in the tanks of the Radioactive Liquid Waste Collection Station of NFP (SCDLR – NFP). Radioactively contaminated waste water, with a concentration of more than 2 mg U/L, is transferred for uranium recovery to the Radioactive Waste Treatment Station of ICN (STDR – ICN), where treatment results into solid and dry uranyl phosphate that is returned to the NFP with nuclear guarantees.
- Radioactive waste water – is waste water with a radioactive content below 1 mg U/L is collected together with the non-radioactive waste water at the Residual Water Collection and Discharge Station



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(SCEAR – NFP) in tanks. Here, it is checked whether the content of uranium, total nitrogen, total phosphorus, beryllium and pH fall within the limits set out under the Operating Regulation of ICN – Pitesti Waste Water Treatment Plant and by CNCAN, after which the radioactively contaminated waste water (radioactive liquid effluents) are discharged into the ICN Treatment Station (SE – ICN).

- Domestic waste water from the NFP is discharged via the domestic sewage network system (separated from industrial sewage networks) into the ICN Treatment Station (SE – ICN), based on the relevant procedures.

The entire monitoring of the liquid fraction is done by the Environmental Protection Laboratory notified by CNCAN and the Flow Laboratories based on the measures mentioned in the regulatory acts that require maximum limits for the operation of the unit.

There are analysis bulletins for the analyses required under the regulatory acts according to the Annual Monitoring Programme approved by CNCAN.

Also, through the SNN Group-wide Water Management Policy, the water-related climate risks have been assessed for each entity site (Cernavoda, Pitesti-Mioveni, Feldioara and Bucharest). For these identified risks, the following measures are envisaged:

Planned actions per site			
Cernavoda	Pitesti (Mioveni)	Feldioara	Bucharest
Optimise the use of Danube water through advanced technologies.	Implement water abstraction and recirculation systems.	Build water storage tanks.	Render the climate control systems more efficient.
Reduce water losses in the cooling circuit.	Develop a programme to reduce the industrial consumption.	Improve the drainage infrastructure to reduce the flood hazard.	Promote responsible water use in offices.
	Deploy industrial water filtering and reuse technologies.		
	Reduce water losses by upgrading the infrastructure.		

There were no significant operational expenditure (OpEx) and/or significant capital expenditure (CaPex) related to the water resources-related actions in SNN Group.

Performance indicators, including on water consumption, are set annually and actions and measures are taken to reduce consumption where possible. Over the years a number of measures have been implemented to reduce both water consumption and losses. Staff are trained and report if they identify places where there are water leaks (e.g. accidental faults, broken seals, etc).

### FPCU Feldioara

In order to protect the water sources, a number of technical and organisational measures are applied:

1. Environmental monitoring program by physical, chemical and radiological analysis of liquid effluent.
2. Monitoring in parallel with other RENAR accredited laboratories.
3. Use of own treatment plants: M2 for the reduction of nitrogen concentrations, M3 – for the retention of volatile substances (oils), Metal Recovery Plant – for the radiological framing of discharged water, M4 – for the chemical framing of discharged water.



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## SNN Group Water and marine resources



### Targets related to water and marine resources | E3-3



#### Cernavoda NPP

The technology used to produce nuclear energy requires the use of a significant amount of water to cool down the heat transfer systems. For operation of Cernavoda NPP, the Danube water is used to ensure that the heat source is taken over from condensers. The amount of water used is set out under the project and can only be adjusted within very small limits, depending mainly on the outside temperature of the input water.

Any reduction in the amount of water required has an impact on the smooth operation of the installation. For this reason, Cernavoda NPP has no reduction targets as to the cooling water taken from the Danube because no streamlining to reduce the cooling water use factor can be foreseen.

According to the requirement of the Water Management Permit, the water need for the following year is determined. Thus, compared to the maximum volume of water drawn, as set out in the permit, the amount of water per unit/per month and total amount are estimated depending on the power plant's cooling needs (for instance, in summertime, between July and October, a larger amount of cooling water is needed compared to the rest of the year, or during planned outages when maintenance activities are performed on the cooling circuits, the volume of water at the stopped unit is lower; this is the only measure that reduces the amount of water used from the Danube.

Volumes of process water, as authorised under the Water Management Permit for Cernavoda NPP

Process water		
	2024 volume	2025 volume
Process water volumes and flow rates for operation of the 2 units under a 365 days/year and 24/7 regime		
Maximum day Q	9,331,200 m <sup>3</sup> /day (108,000 l/s)	9,331,200 m <sup>3</sup> /day (108,000 l/s)
Average day Q	6,863,616 m <sup>3</sup> /day (79,440 l/s)	6,863,616 m <sup>3</sup> /day (79,440 l/s)
Annual max. V	3,405,888 thousand m <sup>3</sup>	3,405,888 thousand m <sup>3</sup>
Annual avg. V	2,505,220 thousand m <sup>3</sup>	2,505,220 thousand m <sup>3</sup>

Under normal conditions, when the Danube water level is normal, no measures to reduce water consumption are necessary. In certain instance, for example in case of drought, when the Danube water level is low, the water regulatory authority ("Apele Romane") enforces restrictions on the use of water for all economic operators. These restrictions are applied mainly to other economic operators and only then to the nuclear power plant, as this is the main and most important beneficiary of the Danube water, as coolant for its aggregates. However, in critical situations, the power plant must be shut down.



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Drinking water is supplied from its own underground source, through 3 deep pits, two of which are located in the envelope, and one is located in the NPP Campus area.

Pit	Depth	Hydrostatic level (Nhs)	Hydrodynamic level (Nhd)	Flow rate (Q)
F1	700 m	4 m	10 m	16 l/s
F2	700 m	3.1 m	5 m	28.5 l/s
F3	700 m	5.17 m	5.92 m	21.2

Volumes of domestic water, as authorised under the Water Management Permit for Cernavoda NPP

Domestic water	2024 volume	2025 volume
Authorised volumes and flows rates of groundwater (Fj1 + Fj2)		
Maximum day Q	2,865 m <sup>3</sup> /day (33.15 l/s)	2,865 m <sup>3</sup> /day (33.15 l/s)
Average day Q	2,660 m <sup>3</sup> /day (30.8 l/s)	2,660 m <sup>3</sup> /day (30.8 l/s)
Annual max. V	1,045.7 thousand m <sup>3</sup>	1,045.7 thousand m <sup>3</sup>
Annual avg. V	970.9 thousand m <sup>3</sup>	970.9 thousand m <sup>3</sup>
Volumes and flow rates of water authorised from the local drinking water supply system of Town of Cernavoda (through the operator: S.C. RAJA S.A. Constanta)		
Maximum day Q	2,160 m <sup>3</sup> /day (25.0 l/s)	2,160 m <sup>3</sup> /day (25.0 l/s)
Average day Q	1,910 m <sup>3</sup> /day (22.1 l/s)	1,910 m <sup>3</sup> /day (22.1 l/s)
Annual max. V	788.4 thousand m <sup>3</sup>	788.4 thousand m <sup>3</sup>
Annual avg. V	697.15 thousand m <sup>3</sup>	697.15 thousand m <sup>3</sup>

The targets set in Cernavoda NPP refer in particular to water quality targets assessed on two major areas:

- to check the quality of the radiologically – assessed water (SNN aims to maintain the volume of radioactivity releases into the air and water, below the regulated level);
- to check the quality of the physically and chemically assessed water.

From a radiological point of view, the liquid effluents of interest and the related Derived Emission Limits, as approved by CNCAN for the nuclear power units of Cernavoda NPP in operation, for each receiving waterway, are presented in the following table.

Derived Emission Limits approved by CNCAN for each of the nuclear units (U1, U2) in operation at Cernavoda NPP

DELs for Liquid Effluent Emissions into the Danube – Black Sea Canal		DELs for Liquid Effluent Emissions into the Danube	
Radionuclide/ Group of Radionuclides	DEL (GBq/year)	Radionuclide/ Group of Radionuclides	DEL (GBq/year)
H-3	1.97E+06	H-3	4.92E+07
C-14	8.94E-01	C-14	4.28E+01
Beta – Gamma		Beta – Gamma	
I-131	9.07E-01	I-131	2.39E+01
I-132	8.53E+01	I-132	1.28E+03
I-133	1.92E+01	I-133	1.17E+02
I-134	2.45E+02	I-134	1.40E+03
I-135	2.58E+01	I-135	4.21E+02
Cr-51	2.87E+02	Cr-51	1.14E+03
Mn-54	2.22E+00	Mn-54	5.11E+01
Fe-59	2.19E+00	Fe-59	4.48E+01



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DELS for Liquid Effluent Emissions into the Danube – Black Sea Canal		DELS for Liquid Effluent Emissions into the Danube – Black Sea Canal	
Radionuclide/ Group of Radionuclides	DEL (GBq/year)	Radionuclide/ Group of Radionuclides	DEL (GBq/year)
Co-58	3.87E+00	Co-58	2.47E+01
Co-60	1.54E-01	Co-60	4.77E+00
Zn-65	5.33E-01	Zn-65	2.47E+01
Sr-89	3.67E+00	Sr-89	9.81E+01
Sr – 90+	9.66E-02	Sr – 90+	3.98E+00
Zr-95+	3.95E+00	Zr-95+	2.98E+01
Nb-95	1.41E+01	Nb-95	9.42E+01
Mo-99	4.82E+01	Mo-99	8.84E+02
Ru-103	1.75E+01	Ru-103	3.98E+01
Ru – 106+	1.52E+00	Ru – 106+	4.21E+01
Ag-110m	9.37E-01	Ag-110m	4.21E+01
Sb-122	1.33E+01	Sb-122	3.11E+02
Sb-124	3.31E+00	Sb-124	1.28E+02
Sb-125	1.49E+00	Sb-125	7.16E+01
Te-132	3.06E+00	Te-132	1.10E+02
Cs-134	4.68E-02	Cs-134	1.99E+00

DELS for Liquid Effluent Emissions into the Danube – Black Sea Canal		DELS for Liquid Effluent Emissions into the Danube – Black Sea Canal	
Radionuclide/ Group of Radionuclides	DEL (GBq/year)	Radionuclide/ Group of Radionuclides	DEL (GBq/year)
Cs-137	4.78E-02	Cs-137	2.24E+00
Ba-140	4.64E+00	Ba-140	5.11E+01
Ce-141	1.67E+01	Ce-141	2.65E+02
Ce-144	1.93E+00	Ce-144	5.51E+01
Eu-152	1.49E-01	Eu-152	5.51E+00
Gd-153	1.97E+01	Gd-153	1.79E+02
Eu-154	2.02E-01	Eu-154	7.16E+00
Hf-181	1.11E+01	Hf-181	3.25E+02
Scintillation liquid ULTIMA GOLD LLT			0.001 active substance 0.00195 off – the – shelf product
PRAESTOL A3040L			3.0
Stormwater, including stormwater from underground drainage and stormwater stored in external drainage sump	In accordance with the baseline targets for surface water quality classification.		

From a non-radiological point of view, the regulated non-radioactive liquid effluents for the water discharged from Cernavoda NPP and the maximum permitted values are presented in the following table.



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Regulated non-radioactive liquid effluents for the water discharged from Cernavoda NPP and the maximum permitted values:

Discharge water category	Quality ratios	Maximum permitted values mg/l
Domestic wastewater (radioactively non-contaminated)	According to the Government Decision no. 188/NTPA 002/2002, as amended and supplemented by the Government Decision no. 352/2005, and the services contract signed with S.C. RAJA. S.A. Constanta	
Process water	Temperature	*
	pH	6.5 – 9.0
	Particulate matters	25
	Total ionic iron	1.5
	Chlorides	250
	Sulphates	200
	Ammonium	3
	Phosphorus	1
	CB05	15
	Sodium	100
	Calcium	150
	Magnesium	50
	Petroleum product	5 (without iriz.)

Discharge water category	Quality ratios	Maximum permitted values mg/l
Process water	Free residual chlorine	0.2
	Hydrazine	0.1
	Morpholine	0.4
	Cyclohexylamine	0.1
	Lithium hydroxide	0.025
	Mixture of hydrazine + lithium hydroxide	0.1 + 0.025
	Mixture of hydrazine + morpholine	0.1 + 0.4
	Mixture of hydrazine + morpholine + cyclohexylamine	0.1 + 0.4 + 0.1
	Rhodamine – discharging into the CDMN	2.0
	– discharging into the Danube	10.0
	Fluorescein – with discontinuous discharge	0.25
	RGCC-100	1.0 off – the – shelf product
	Biomate 5716	1.0
Biocide MB – 40	5.2 active substance 0.01 (ml/l) off – the – shelf product	
Ethylene glycol (DOWCAL 10)	< 1.0	



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Targets for water and marine resources Cernavoda NPP	MU	Base year 2023*	Target for 2030	Target for 2035	Target for 2040	Target for 2045	Target by 2050
Process water (abstracted)	thousand cubic meters	2,406,239	2,574,688	2,485,607	2,485,607	2,485,607	2,485,607
Domestic water	cubic m	550,584	550,584	1,101,168	1,101,168	1,101,168	1,101,168
Process water (recirculated)	thousand cubic meters	254,334	250,000	250,000	250,000	250,000	250,000
Process water discharged	thousand cubic meters	2,151,905	2,324,688	2,235,607	2,235,607	2,235,607	2,235,607

Starting in 2031, with the increase in production through the commissioning of U3, domestic water consumption will increase by 50% compared to the baseline consumption;

From 2032, with the increase in production through the commissioning of U5, domestic water consumption will increase by 50% compared to the baseline consumption;

From 2033 with 4 units in operation, domestic water consumption will increase by 100%, compared to the baseline consumption. Domestic water is used exclusively for washing or decontamination, it is taken by the sewerage network of Cernavoda and transmitted to the treatment plant where it will be subjected to the treatment process so that the effluent to meet the conditions of discharge into the emissary imposed by the regulations in force.

In order to monitor attainment of the targets and their performance, monthly tracking of the performance

indicator “Compliance with the in-scope GMS/Environment/ CNCAN requirements” is considered.

Thus, the following sub-indicators result from the monitoring data analysis:

1. All the GMS/ENVIRONMENT/CNCAN requirements under SCH responsibility have been met (100%)
2. All physical and chemical polluters have fallen within the GMS/ENVIRONMENT limits (100%)
3. All 11 reviews on SCH services contracts requested by GMS/ENVIRONMENT have been carried out (100%)
4. No RENA were requested in 2025(100%)
5. All the letters to authorities have been sent in due time, as required by the Protocols/GMS/ENVIRONMENT (100%)

#### Pitesti NFP

Being an EMAS registered organization, Pitesti NFP is bound to set annual environmental objectives, metrics and targets, and be concerned about performance at all times. In order to attain these targets and to meet the

objective, a programme setting out measures, actions, owners and implementation time – limits needs to be devised. Thus, the Environmental Management Programme is developed annually to set actions that aim to achieve the set targets. Stakeholders have not been involved in target setting.

The list of environmental objectives and targets is enclosed to the Environmental Performance Report, a report prepared by the staff of the Nuclear Safety and Licensing Service and a part of the annual Management Review Report.

The mission of NFP is to manufacture CANDU-6 type nuclear fuel bundles under maximum safety, economic efficiency, and care for people and the environment, by complying with the legal and regulatory requirements applicable to nuclear activities, environmental protection, and occupational health and safety.

In addition to the measures regarding nuclear safety, the product quality, under the *NFP Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety, emergencies and health, physical protection, control of nuclear safeguards, cyber security, and protection of classified information*, the NFP management have committed to take all necessary measures for the Monitoring, assessment and continuous improvement of the environmental performance, pollution prevention, sustainable use of resources and biodiversity conservation;  
The general objectives of SNN Group are translated into sub – unit objectives, which are then translated into specific objectives.



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The following areas shall be considered when setting specific targets: ensuring product quality, economic efficiency, nuclear safety and nuclear safety culture, environmental protection, occupational health and safety, cybersecurity, emergency management and business continuity, management system efficiency, compliance with the requirements of the Integrated Management System, implemented under Law 111/1996 (development of procedures on time, implementation of corrective/preventive actions, realisation of staff training, compliance with compliance obligations, etc.), compliance with the requirements of the internal managerial control standards contained in OSGG 600/2018. In view of the above, each year the NFP sets objectives and performance indicators specific to environmental protection.

According to the procedure CN – MM – 06 “Environmental Performance Assessment”, NFP prepares, on a quarterly/half-yearly/yearly basis, an Analysis Report on the implementation of the Environmental Management Programme and, on a yearly basis, the Environmental Performance Assessment Report, which includes at least:

1. the degree of achievement of the environmental objectives, metrics and targets, including an explanation of the situations that led to their non-achievement and the corrective actions needed to be implemented;
2. the results of the assessment of compliance with the compliance obligations assumed by the NFP;
3. results of internal audits carried out in accordance with the requirements of procedure CN – AC – 23 and external audits in the field of environmental protection;

4. the results of the inspections carried out by the staff with environmental protection responsibilities within the SSNA as required by procedure CN – MM – 10

In case the results of the assessments indicate a downward trend in the performance of the environmental management system, preventive actions, according to procedure CN – AC – 17, or corrective actions, according to procedure CN – AC – 72, shall be taken.

In Pitesti NFP, there have been no independent checks on the how water is used. Cooperation with other entities to reduce the use of water is not pursued by Pitesti NFP. Pitesti NFP does not hold a Water Management Permit, as the needed water is supplied by the Nuclear Research Institute (ICN) of Pitesti.

Pitesti NFP decided to implement the requirements of the Regulation (EC) No 1221/2019 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco – management and audit scheme (EMAS), as amended by the Regulation (EU) no. 2017/1505 of the Commission of 28 August 2017 and Regulation (EU) no. 2018/2026 of the Commission of 19 December 2018. The decision to implement the requirements of this regulation was made voluntarily; Pitesti NFP obtained the EMAS registration in 2020, renewed it in 2023 and 2025.

After EMAS registration, Pitesti NFP is required under the relevant Regulation to set performance indicators concerning the following areas:

- eficiența energetică;

- eficiența materialelor;
- apă;
- deșeuri;
- biodiversitate (pentru acest domeniu FCN Pitești nu a stabilit un indicator, justificând și de ce consideră că nu este relevant pentru activitate);
- emisii.

Being an EMAS registered organization, Pitesti NFP is bound to set annual environmental objectives, metrics and targets, and be concerned about performance at all times. In order to attain these targets and to meet the objective, a programme setting out measures, actions, owners and implementation time – limits needs to be devised. Thus, the Environmental Management Programme is developed annually to set actions that aim to achieve the set targets. Stakeholders have not been involved in target setting.

The list of environmental objectives and targets is enclosed to the Environmental Performance Report, a report prepared by the staff of the Nuclear Safety and Licensing Service and a part of the annual Management Review Report.

According to the Performance Indicators Evolution Report in early 2026, the performance indicator related to drinkable water use in relation to the number of employees has been achieved, with a reduction of drinkable water use unit per employee by 12.58% in 2025 as compared to 2024. The indicator fell within the proposed target, i.e. a reduction of at least 0.1%.



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	2024	2025	2025	
			Proposed	Actual
Amount of water used (m <sup>3</sup> )	5,010	4430	14.22	12.44
Average headcount (Pitesti NFP)	352	356		
Ratio between the amount of water used and the average headcount	14.23	12.44		

In order to progressively reduce the amount of water consumed, the previous year was taken as a baseline for setting the targets, i.e. 5,010 m<sup>3</sup> in 2024. The percentage reduction of 0.1% has been achieved.

Targets for water and marine resources	MU	Base year 2023*	Target for 2025	Target for 2030	Target for 2035	Target for 2040	Target for 2045	Target by 2050	Scenario	Explanations
<b>Pitesti NFP</b>										
Process water (industrial water) (*)	cubic m	147	150	150	150	150	150	150	1	Scenario 1 refers to a production of 11000 FB.
			150	150	195	195	195	195	2	
Domestic water	cubic m	5,489	5,630	5,630	5,630	5,630	5,630	5,630	1	Scenario 2 refers to the implementation of the project of doubling the production capacity and considered a production of 22,000 FB.
			5,630	6,500	6,700	6,900	7,100	7,100	2	
Process and domestic water consumption (water abstracted)	cubic m	5636	5,510	5,510	5,510	5,510	5,510	5,510	1	
			5,780	6,650	6,895	7,095	7,295	7,295	2	
Discharge water, including radioactive and non-radioactive effluents (**)	cubic m	5,050.8	5,202	6,025.5	6,205.5	6,385.5	6,565.5	6,565.5	2	

(\*) quantities are estimated under normal operating conditions. No allowance has been made for possible damage.

(\*\*) the quantity of water discharged has been calculated as approximately 90% of the water abstracted.

Pitesti NFP has developed an assessment process only for its environmental objectives, indicators and targets, those indicators set for EMM and EMAS. Applicable procedure – Environmental Performance Assessment, code CN-MM-06. Performance is monitored on a monthly basis for domestic/drinking water



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### FPCU Feldioara

According to the requirement of the Water Management Permit, the water need for the following year is determined, and the unit has complied with such target water consumption.

Volumes of water, as authorised under the Water Management Permit

Process water	2024 volume	2025 volume
Process water volumes and flow rates for operation under a 365 days/year and 24/7 regime		
Maximum day Q	2,822.0 m <sup>3</sup> /day (33.66 l/s)	2,822.0 m <sup>3</sup> /day (33.66 l/s)
Average day Q	577.00 m <sup>3</sup> /day (6.68 l/s)	577.00 m <sup>3</sup> /day (6.68 l/s)
Annual max. V	719.61 thousand m <sup>3</sup>	719.61 thousand m <sup>3</sup>
Annual avg. V	147.135 thousand m <sup>3</sup>	147.135 thousand m <sup>3</sup>

For internal target – setting purposes, the baseline year considered was 2023, the year with the lowest consumption. There is a monitoring process for the water circuit (abstraction, treatment, discharge).

	MU	Base year 2023	Target for 2030	Target for 2035	Target for 2040	Target for 2045	Target for 2050	Explanations
Process water	cubic m	85,920	94,000	94,000	No targets have been estimated.	No targets have been estimated.	No targets have been estimated.	
Domestic water	cubic m	12,000	16,000	16,000	16,000	16,000	16,000	The baseline value for 2023 is reported for 9 months unit of operation.  Volume required for decontamination related to equipment and personnel existing at this date
Process and domestic water consumption	cubic m	97,920	110,000	110,000	60,000	60,000	60,000	The baseline value for 2023 is reported for 9 months unit of operation.
Radioactive and non-radioactive effluents	cubic m	23,890	60,500	60,500	30,000	30,000	30,000	
Water abstracted	cubic m	97,920	110,000	110,000	60,000	60,000	60,000	
Discharge water	cubic m	23,890	60,500	60,500	30,000	30,000	30,000	













### SNN Headquarters; EnergoNuclear; NuclearelectricaServ

The entities SNN HQ and EnergoNuclear use water only for domestic purposes; thus, it was decided not to set consumption reduction targets, because this is insignificant compared to the consumption of the other three organisations (Cernavoda NPP, Pitesti NFP and FPCU Feldioara). NuclearelectricaServ does not hold a Water Management Permit, as the water needed is supplied by the Group (Nuclearelectrica, S.A.); the amount of water used by the this company is charged based on the reported consumption.

Calculation of the GHG emission targets was done by responsible persons of each SNN Group entity, who work directly, count and can estimate the emission increases or decreases over the next 25 years. Entities that use water in production processes have set voluntary targets, following the ESRs standards. There are subject to the legislation in force and have been imposed various indicators and permitted maximum limits due to be observed.



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## SNN Group Water and marine resources



### Water consumption | E3-4



#### Cernavoda NPP

For the amount Danube water used for cooling in Cernavoda NPP, an independent check is conducted by the regulator in order to make sure that the maximum permitted quantities are not exceeded, and the amounts of water used are confirmed by the water regulatory authority ("Apele Romane") at conclusion of the annual contracts (Apele Romane being the sole operator under the legislation in force).

A water recycling system does not apply to Cernavoda NPP because there is no actual water pollution with pollutants that require recycling.

CERNAVODA NPP	2024	2025
Total water consumption (m <sup>3</sup> )	2,421,908,508 m <sup>3</sup>	2,426,824,287 m <sup>3</sup>
Drinking water consumption (m <sup>3</sup> )	4,116,000 m <sup>3</sup>	478,503 m <sup>3</sup>
Industrial water consumption (m <sup>3</sup> )	2,417,792,508 m <sup>3</sup>	2,426,345,784 m <sup>3</sup>
Total water consumption in areas at water risk, including areas with high-water stress (m <sup>3</sup> )	0	0
Total water recycled and reused (m <sup>3</sup> )	214,353,792 m <sup>3</sup>	238,257,288 m <sup>3</sup>
Total water stored (m <sup>3</sup> )	3,000 m <sup>3</sup>	3,000 m <sup>3</sup>
Changes in storage (m <sup>3</sup> )	6,000 m <sup>3</sup>	14,400 m <sup>3</sup>
Water consumption intensity  (total water consumption in own operations in m <sup>3</sup> per net income, in million EUR)	2.625	2.188
Additional intensity ratios	-	-
Total water withdrawals	2,421,908,508 m <sup>3</sup>	2,426,824,287 m <sup>3</sup>
Total water discharges	2,421,908,508 m <sup>3</sup>	2,426,824,287 m <sup>3</sup>



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Water consumption in Cernavoda NPP, broken down by each Unit and by type of water (domestic and industrial)

CERNAVODA NPP	Quantitative values in 2024	Quantitative values in 2025
<b>Domestic water</b>		
<b>Volume captured U1 (thousand m3/year)</b>	411.6 (U1 +U2)	478.5 (U1 +U2)
Fj1 + Fj2 total volume	411.6	478.5
RAJA total volume	0	1.440
<b>Volume captured U2 (thousand m3/year)</b>	411.6 (U1 +U2)	479.9
Fj1 + Fj2 total volume	411.6	478.5
RAJA total volume	0	1.4
<b>Total water discharges (thousand m3/year)</b>	411.6	479.9
<b>Process water</b>		
<b>Total volume U1 (thousand m3/year)</b>	1,148,611.680	1,273,833.756
Fresh water volume	1,012,599.599	1,140,462.360
Recirculated volume	136,012.081	133,371.396
<b>Total volume U2 (thousand m3/year)</b>	1,269,180.828	1,152,512.028
Fresh water volume	1,190,839.117	1,047,626.136
Recirculated volume	78,341.711	104,885.892
<b>Total water discharges (thousand m3/year)</b>	2,203,438.716	2,188,566.999
<b>Total domestic water</b>	<b>411.6</b>	<b>478.5</b>

### Pitesti NFP

The central area of the county, where the ICN – NFP platform is located, is occupied by forested Subcarpathian hills with heights ranging between 400 m ÷ 500 m.

In Arges County groundwater is generally found at great depths (over 100 m), due to both the predominant relief and its geological structure. In the Arges river as well as in the south – western and southern riverbeds, groundwater is found at depths between 10 m ÷ 20 m and can be collected by wells with a flow rate between 5 l/s ÷ 14 l/s, sometimes even having permanent flow (artesian wells).

In the riverbeds in the vicinity of the site, Argesel, Targului, Doamnei, and in the gravel and boulder layers in the structure of the low banks and terraces, there is a rich groundwater table.

In view of the above, the area where the organisation is located is not classified as a high water risk area.

The water used in the NFP is supplied by RATEN ICN, which is located on the same site as the NFP. Pitesti NFP uses industrial water for cooling equipment in the manufacturing process (e.g.: sintering furnaces, hydrogen station etc).

The industrial water is recirculated and cooled in NFP's own basins (8 m3 and 10 m3 respectively) and replaced about 3 times a year.

The industrial water consumption of the NFP varies between 100 – 200 m3/year depending on the need in the

production flow, utilising the NFP recirculation installations.

The fire water reserve is provided by two underground tanks used for potable water, domestic water, and fire water supply, each with a capacity of 500 m<sup>3</sup>. They are located on the Pitesti ICN site.

The amount of water consumed is measured directly.

There are no water catchment basins on the NFP platform. The NFP production is used as intermediate consumption for the Cernavoda NPP Branch so that Pitesti NFP does not register income and cannot calculate the intensity of water consumption in relation to the own net income. The intensity was calculated on the consolidated income of SNN (SNN HQ, Cernavoda NPP and Pitesti NFP).

The value of water consumption related to the production cost of FB – as at 31 December 2025 the calculated rate is 0.04%. Pitesti NFP does not directly carry out any water sampling.

The water is supplied to the site under a services contract from the drinking water station located on the ICN – NFP platform, located in the premises of Pitesti ICN, consisting of two water storage tanks with V = 1,000 m3 each and built of reinforced concrete. From the storage tanks, water is distributed for drinking purposes via a pumping station made up of 4 pumps and one fire pump, in a branched distribution network through which it reaches the networks inside Pitesti NFP. Water quality is determined with analyses carried out by Public Health Directorate



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(PHD) of Arges; a copy of these reports is sent also to Pitesti NFP by RATEN – ICN. The quantities of drinking water and industrial water are measured by reading a meter.

The water supply for industrial purposes is provided from the treated raw water station to cover all needs of the entire ICN – NFP platform, located in the premises of Pitesti ICN, and which consists of two storage tanks with V = 1,000 m<sup>3</sup> each. Water distribution for process-related purposes is done via a pumping station made up of 6 pumps and a branched distribution network to Pitesti NFP's networks. Industrial water is used as cooling water for the two production sections, i.e. for the sintering furnaces, the hydrogen station, the heat treatment furnaces, as well as certain support processes. With its two cooling water recirculation systems, Pitesti NFP obtains a smaller industrial water consumptions by recirculating the water existing in the two tanks, with no need to continuously use industrial water from ICN. The current industrial water consumption for the two recirculation plants is about 30 m<sup>3</sup>.

The water needed for firefighting is supplied from the relevant water station located in the premises of Pitesti ICN, and which is made up of the intangible volume of 500 m<sup>3</sup> available in the two drinking water storage tanks.

To produce domestic hot water, Pitesti NFP also uses a solar plant consisting of 30 solar panels, with ethylene glycol as the transfer medium. NFP also holds a water demineralisation station and two cooling water recirculation plants.

Pitesti NFP does not discharge any water into any outlet; wastewater is transferred via a sewage system to the ICN Pitesti Treatment Plant (operator located on a platform shared with NFP). In the Treatment Plant, this is treated, analysed and then discharged into the outlet.

PITESTI NFP	2024	2025
Total water consumption (m <sup>3</sup> )	5,172 m <sup>3</sup>	4,480.5 m <sup>3</sup>
Drinking water consumption (m <sup>3</sup> )	5,010 m <sup>3</sup>	4,430 m <sup>3</sup>
Industrial water consumption (m <sup>3</sup> )	162 m <sup>3</sup>	50.5 m <sup>3</sup>
Total water consumption in areas at water risk, including areas with high-water stress (m <sup>3</sup> )	0	0
Total water recycled and reused (m <sup>3</sup> )	162 m <sup>3</sup>	50.5 m <sup>3</sup>
Total water stored (m <sup>3</sup> )	1,000 m <sup>3</sup>	1,000 m <sup>3</sup>
Changes in storage (m <sup>3</sup> )	0	0
Water consumption intensity (total water consumption in own operations in m <sup>3</sup> per net income, in million EUR)	0.0000718	0.0000586
Additional intensity ratios	-	-
Total water withdrawals	5,172 m <sup>3</sup>	4,480.5 m <sup>3</sup>
Total water discharges	4,655 m <sup>3</sup>	4,032.45 m <sup>3</sup>

### SNN Headquarters

At the headquarters, water is used only for domestic purposes by company employees. In 2024, the total drinking water consumption was 1,686.78 cubic meters, and increased to 2,038.95 m<sup>3</sup> in 2025; this increase is due to the extension of the leased area for office, as water consumption is reported directly based on the surface area. No water is recycled, reused, stored or tested at the headquarters. The consumed water is monitored by the meters installed on the supply pipe by Apa Nova Bucharest personnel.

SNN Headquarters	2024	2025
Total water consumption (m <sup>3</sup> )	1,686.78 m <sup>3</sup>	2,038.95 m <sup>3</sup>
Drinking water consumption (m <sup>3</sup> )	1,686.78 m <sup>3</sup>	2,038.95 m <sup>3</sup>
Industrial water consumption (m <sup>3</sup> )	0 m <sup>3</sup>	0 m <sup>3</sup>
Total water consumption in areas at water risk, including areas with high-water stress (m <sup>3</sup> )	0	0
Total water recycled and reused (m <sup>3</sup> )	0 m <sup>3</sup>	0 m <sup>3</sup>
Total water stored (m <sup>3</sup> )	0 m <sup>3</sup>	0 m <sup>3</sup>
Changes in storage (m <sup>3</sup> )	0	0
Water consumption intensity (total water consumption in own operations in m <sup>3</sup> per net income, in million EUR)	-	-
Additional intensity ratios	-	-
Total water withdrawals	0 m <sup>3</sup>	0 m <sup>3</sup>
Total water discharges	0 m <sup>3</sup>	0 m <sup>3</sup>



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### FPCU Feldioara

For the use of process water, the unit has five deep boreholes that feed two reservoirs of 2,500 cubic meters each, from where the installations that require water consumption related to the technological process are supplied.

Part of the treated water (60%) is recirculated and used in certain stages of the technological process.

The increase in the volume of treated water discharged in 2025, from 34,620 m<sup>3</sup> to 85,400 m<sup>3</sup>, is the result of a responsible management process of the storage pond, with a total capacity of 800,000 m<sup>3</sup>. The controlled discharge of a larger amount of treated water was necessary to maintain an optimal level in the pond, prevent its overflowing and ensure its safe operation.

This measure was also aimed at protecting the surrounding ecosystems, avoiding the risk of seepage or uncontrolled spills and maintaining the quality of the stored water. The discharged water complied with the treatment parameters according to the legislation in force, and the decision to increase the discharged volume was taken precisely to prevent any adverse impact on the environment.

FPCU Feldioara	2024	2025
Total water consumption (m <sup>3</sup> )	93,140 m <sup>3</sup>	79,870 m <sup>3</sup>
Drinking water consumption (m <sup>3</sup> )	0	0
Industrial water consumption (m <sup>3</sup> )	0	0
Total water consumption in areas at water risk, including areas with high-water stress (m <sup>3</sup> )	0	0
Total water recycled and reused (m <sup>3</sup> )	58,520 m <sup>3</sup>	52,990 m <sup>3</sup>
Total water stored (m <sup>3</sup> )	0	0
Changes in storage (m <sup>3</sup> )	0	0
Water consumption intensity (total water consumption in own operations in m <sup>3</sup> per net income, in million EUR)	0.0049	0.005
Additional intensity ratios	-	-
Total water withdrawals	-	-
Total water discharges	34,620 m <sup>3</sup>	85,400 <sup>12</sup> m <sup>3</sup> .

<sup>12</sup> The volume of water discharged is limited under the Water Management Permit to a maximum of -140 m<sup>3</sup>/day.

### EnergoNuclear

EnergoNuclear's water consumption is given for domestic use. All EnergoNuclear utilities are included in the price paid for the rented space. EnergoNuclear does not pay separate utility bills. To estimate the water consumption, the spend-based method was used, building on the assumption of an allocated cost per square meter for

utilities (which was stipulated in the old lease contract – EUR 2.5/m<sup>2</sup>, of which: 40% energy, 40% heating, 10% sanitation, and 10% domestic water).

EnergoNuclear	2024	2025
Total water consumption (m <sup>3</sup> )	1,075 m <sup>3</sup>	1,937 m <sup>3</sup>
Drinking water consumption (m <sup>3</sup> )	1,075 m <sup>3</sup>	1,937 m <sup>3</sup>
Industrial water consumption (m <sup>3</sup> )	0 m <sup>3</sup>	0 m <sup>3</sup>
Total water consumption in areas at water risk, including areas with high-water stress (m <sup>3</sup> )	0	0 m <sup>3</sup>
Total water recycled and reused (m <sup>3</sup> )	0 m <sup>3</sup>	0 m <sup>3</sup>
Total water stored (m <sup>3</sup> )	0 m <sup>3</sup>	0 m <sup>3</sup>
Changes in storage (m <sup>3</sup> )	0	0 m <sup>3</sup>
Water consumption intensity (total water consumption in own operations in m <sup>3</sup> per net income, in million EUR) <sup>13</sup>	-	-
Additional intensity ratios	-	-
Total water withdrawals	0 m <sup>3</sup>	0 m <sup>3</sup>
Total water discharges	0 m <sup>3</sup>	0 m <sup>3</sup>

<sup>13</sup>EnergoNuclear has no income.

### Nuclearelectrica Serv

Not applicable. The water consumption of Nuclearelectrica Serv is re – invoiced by Cernavoda NPP.



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## SNN Group Water and marine resources



**Anticipated financial effects from significant risks and opportunities related to water and marine resources**  
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No detailed quantification of the anticipated financial effects has been conducted in monetary terms, except for estimates in the double materiality assessment process and before considering the water-related actions. In the assessment conducted for 2025, only one risk was identified as material on the topic Water and marine resources, related to the exceeded heating limit of the Danube downstream due to the use of water to cool down the plant, which may cause to the shutdown of the production units and potential financial losses. The risk is Applicable only for Cernavoda NPP. The measures put in place to mitigate this risk have been addressed earlier in this chapter.



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## SNN Group Biodiversity and ecosystems



Material impacts, risks and opportunities and their interaction with strategy and business model | *SBM-3*



In SNN Group, there are two sites that are considered to have a potential impact on biodiversity, namely Cernavoda NPP and Pitesti NFP; no material negative impacts have been identified for the other subsidiaries of the Group (SNN HQ, FPCU Feldioara, EnergoNuclear, or NuclearelectricaServ). At a general level, the SNN Group can have a positive impact on biodiversity by creating special dedicated spaces.t

Biodiversity conservation at the SNN Group entities that carry out nuclear operations, Cernavoda NPP, NFP and FPCU Feldioara, is constantly and recurrently carried out, according to the procedures for monitoring the impact on air, water and soil, and the results of these measurements have demonstrated that there is no harmful effect on biodiversity and ecosystems in 2025 and before, according to the previous Environmental Statements. The environmental management system, procedures and frequency of measurements, in conjunction with the limits set by the authorities in the field, ensure strict compliance with environmental indicators, thereby eliminating adverse effects on biodiversity.

### Cernavoda NPP

The Nuclear Power Plant of Cernavoda is located in County of Constanta, about 2 km South – East from the limits of Town of Cernavoda, about 1.5 km North – East from the first lock of the Danube – Black Sea navigable canal, on the land in the area of the platform resulting from excavations of the former Ilie Barza limestone quarry, at 44°20' north latitude and 28°01' east longitude.

The actual and potential impacts on biodiversity on the own sites, and on the surroundings, were assessed in

waves, by conducting complex environmental studies called *Environmental Impact Report and Environmental Balance – Sheet*, which addressed also the topic of biodiversity. All these studies are public<sup>31</sup>, and moreover, they are subject to public debate and consultation (for instance, in order to issue an environmental permit, the Ministry of Environment organised a public debate).

According to the 2022<sup>32</sup> County Report on the Environment Status, published on the website of the Environmental Protection Agency of Constanta “the additional exposure of the local population due to operation of Cernavoda NPP is insignificant compared to natural exposure and under the domestic national and international regulations on the population exposure to nuclear practices”.

Also, according to the 2020 (most recent) Health, Safety and Environment Report, published on the website of the National Public Health Institute, “Drinking water quality ensures compliance with the quality indicator value, at a total dose of 0.1 mSv per year. Tritium concentrations in the impact zone of Cernavoda NPP were below 100 Bq/l. The determinations conducted in 2020 on in drinking water or foodstuff (milk and mixed diet) found no contamination leading to a significant increase of the dose by ingestion in the territory of Romania. According to this report, the monitoring programme carried out by the laboratories of the Public Health Directorates consisted of determinations of global alpha and global beta activity, as well as of the natural and artificial radionuclide concentrations in samples of drinking water and foodstuff (milk and mixed diet).

Under the environmental legislation in force, namely:

- Minister Order (MO) no. 1964/2007 establishing the



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status of natural protected area for the sites of Community importance, as an integral part of the Natura 2000 European ecological network in Romania, as amended and supplemented by MO no. 2387/2011;

- Government Decision no. 1284/2007 declaring the special bird protection areas as an integral part of the Natura 2000 ecological network in Romania, as amended and supplemented by Government Decision no. 971/2011;
- Government Emergency Ordinance no. 57/2007 on the regime of protected natural areas, conservation of natural habitats, and wildlife, as approved by Law no. 49/2011, as subsequently amended and supplemented

The Cernavoda NPP platform is not located in any protected areas or sites or areas, but only in the vicinity of such areas. Most of the areas in the 30 km zone around the power plant, the banks of the Danube and Ialomitei Pond are covered by anthropic ecosystems. The biodiversity that existed before farming expansion in the reference area is being replaced over large areas, with the original flora and fauna being preserved on small "islands" surrounded by cereal crops.

The site of Cernavoda NPP is bordered to the north by Cismelei Valley, and to the south – west by County Road (DJ) 223. The closest Natura 2000 sites are Canaralele Dunarii (ROSCI0022) and ROSPA0002 "Allah Bair – Capidava, and may be the most susceptible in terms of biodiversity impact, given the proximity to the Cernavoda NPP platform and their location downstream the cooling water discharge outlet into the Danube.

Protected natural areas of EU and national interest located within a radius of 15 km from Cernavoda NPP Cernavodă și situarea în aval de locul de deșeușare a apei de răcire în Dunăre.

Arii naturale protejate de interes comunitar și național situate pe o rază de 15 km față de CNE Cernavodă .

Type of site	Code of site	Name of site	Comments
Natura2000 Site of Community importance	ROSCI0022	Canaralele Dunarii	– Approx. 2.2 km straight – line distance to the Cernavoda NPP platform – The cooling water from Cernavoda NPP is discharged through a circuit made up of boxes, tunnels, an open concrete canal and a dirt channel, discharging into the Danube 6.3 km away from the NPP platform's boundary. The northern end of the protected area is at a distance of approx. 52 km downstream the cooling water outlet into the Danube. The Stereo 70 coordinates of the confluence point are: X (North) 323843 m; Y (East) 742188 m
Natura2000 Site of Community importance	ROSCI0353	Pestera – Deleni	– Approx. 13.4 km SSE of the Cernavoda NPP platform
Natura2000 Site of Community importance_proposed	ROSCI0412	Ivrinezu	– An area proposed as a site of community Importance, which is found in the public thematic layer on the Ministry of Environment website (accessed in August 2017).
Natura2000 Special Bird Protection Area	ROSPA0001	Aliman – Adamclisi	– Approx. 11.5 km S – SW from the Cernavoda NPP platform
Natura2000 Special Bird Protection Area	ROSPA0002	Allah Bair – Capidava	– Approx. 10.3 km to the NPP platform – The southern boundary of the protected area is about 6.5 km downstream the cooling water outlet into the Danube. – Area declared by the Romanian Ornithological Society as Important Bird Area (IBA) – code RO107 Allah Bair – Capidava
Natura2000 Special Bird Protection Area	ROSPA0012	Bratul Borcea	– Approx. 10.06 km to Cernavoda NPP – The confluence Borcea Branch – the Danube is approx. 52 km downstream the cooling water outlet into the Danube.
RAMSAR Wetland of international importance	RORMS0014		
Natura2000 Special Bird Protection Area	ROSPA0039	Dunare – Ostroave	– SW – W from the NPP; the closest point is located about 1.8 km from Cernavoda NPP – Upstream the cooling water intake for NPP and its return to the Danube.
IUCN Monument of nature	RONPA0371	Cernavoda Fossil site	– Approx. 2.6 km W – NW to the Cernavoda NPP platform
IUCN Monument of nature	RONPA0372	Seimenii Mari Fossil site	– Approx. 8.8 km N of the Cernavoda NPP platform
RAMSAR Wetlands of international importance	RORMS0017	Ostroavele Dunarii – Bucgeac – Iortmac	– Includes the Natura2000 sites: ROSCI0022 Canaralele Dunarii, ROSPA0001 Aliman – Adamclisi ROSPA0002 Allah Bair – Capidava.



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The survey *Impact of the operation of Cernavoda Nuclear Power Plant on the Aquatic and Terrestrial Organisms in its Area of Influence* was conducted in years 2008 – 2012 and was followed up in 2013 – 2016 under the programme for monitoring the impact of the Cernavoda Nuclear Power Plant's operation on the aquatic and terrestrial organisms in its area of influence, did not highlight any material impact Cernavoda NPP's operation on the local biota.

According to the report produced further to the campaigns carried out in 2016 in the area of influence of Cernavoda NPP, no atypical changes in the structure of plant associations were observed. From an artificial association – Lolium and trifolium – the turf that was part of the original landscape architecture – we have now a “new ecosystem”, with a greater number of new plant species, the seeds of which have been carried naturally by birds or wind, increasing their variability. The evolution of plant associations from “simple” (a few) to “complex” (several species with a specific spatial arrangement) points to favourable conditions (unaltered by the plant's activity) for growth in the NPP ecosystem and for amplification of the gene pool diversity.

Also, according to the same survey, there is no need to intervene in the evolution of the ecosystem, and the signs of vegetation amplification and diversification support this claim. Snails, fish, birds, insects, etc. can be turned to account to justify the biosensors existing in the ecosystem, which a clear sign, even to non-*connoisseurs*, the existence of a clean environment.

The non-significant impact on biodiversity was independently assessed also in the document named “*Refurbishment of Unit 1 of Cernavoda NPP and expansion of the 1 Intermediary Spent Fuel Storage Facility with MACSTOR 400 type modules*”<sup>14</sup>. The study was carried out by independent experts and assessed all sites in the region.

#### Pitesti NFP

Pitesti NFP is not located in any protected areas or sites or areas. The Nuclear Fuel Plant is located on the ICN – Pitesti NFP shared platform, which covers an area of 47.90 ha, of which Pitesti NFP occupies 23,273.40 sq.m. The site is located about 13.4 km NE of City of Pitesti (about 19.7 km by road), County of Arges, within the administrative territory of Town of Mioveni; the position of Pitesti NFP against the neighbouring human settlements is as follows:

- to NNE, Racovita District (Mioveni), at approx. 2 km;
- to NW, Village of Negresti, at approx. 7 km;
- at W, Town of Mioveni (former Colibasi), at approx. 3 km;
- to SW, Colibasi district (Mioveni) and DACIA RENAULT companies, at approx. 2.5÷3 km.

The site is located in an afforested area, at an altitude around +450 m above the Black Sea level, and about +150 m above the Doamnei Riverbed.

The area where Pitesti NFP is located is not declared a sensitive area, and is qualified as an industrial platform. Any sensitive areas are declared neither in the proximity of Pitesti NFP.

For Pitesti NFP, a potential material negative impact has been identified in connection with the infrastructure expansion and land use change, which may lead to soil sealing.

#### SNN Headquarters

Within the SNN headquarters, administrative (office) activities are carried out for the entire Nuclearelectrica activity. The head office is located in Bucharest in a residential and economic area. The SNN activities within the headquarters do not generate environmental issues with impact on biodiversity, the nearest protected natural area being the Vacaresti Natural Park located about 12.5 km southeast of the headquarters. Therefore, due to the location, no biodiversity protection policies have been implemented.

#### FPCU Feldioara

FPCU Feldioara SRL is located at an approximate distance of 3.5 km from the protected natural areas ROSPA 0093 Padurea Bogatii and 6.5 km from ROSPA 0037 Dumbravita Rotbav – Magura Codlei. 6 km from ROSCI 0329 Oltul Superior.

According to the annual environmental report published on the website of the Environmental Protection Agency, the activity on the plant platform has not influenced the species and habitats protected by the Natura 2000 sites mentioned above.

Due to the considerable distances to protected natural areas no significant impact on protected species was identified.



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<sup>14</sup> Raport privind Impactul asupra Mediului pentru proiectul *Retehnologizarea Unității 1 a CNE Cernavodă și Extinderea Depozitului Intermediar de Combustibil Ars cu module de tip MACSTOR 400*, Elaborator: Asocieria SC CEPSTRA GRUP SRL, RATEN INSTITUTUL DE CERCETĂRI NUCLEARE PITEȘTI, SC UNITATEA DE SUPORT PENTRU INTEGRARE SRL, [https://nuclearelectrica.ro/wp-content/uploads/2024/07/1-RIM.CG\\_RTI1si-Ext-DICA-M400\\_FINAL\\_RO.pdf](https://nuclearelectrica.ro/wp-content/uploads/2024/07/1-RIM.CG_RTI1si-Ext-DICA-M400_FINAL_RO.pdf)



### EnergoNuclear

For the offices of EnergoNuclear of Bucharest, there are no risks or impacts on biodiversity, as it is located in an urban environment. In the case of Units 3 and 4 for the Cernavoda NPP project, the assessment of the project's impact on biodiversity concluded that the project would have an insignificant impact on protected species and habitats, as well as on protected natural areas and Natura 2000 Sites in the area. In the area of Units 3 and 4, no natural habitats or species of community interest have been identified that could be affected, and the project will not damage natural habitats of community interest and will not use resources essential for the biodiversity of protected areas. protejate.

### NuclearelectricaServ

Nuclearelectrica Serv SRL provides services for Cernavoda NPP. The Cernavoda NPP platform is not located in any protected areas or sites or areas, but only in the vicinity of such areas. Most of the areas in the 30 km zone around the power plant, the banks of the Danube and Ialomitei Pond are covered by anthropic ecosystems. The

biodiversity that existed before farming expansion in the reference area is being replaced over large areas, with the original flora and fauna being preserved on small "islands" surrounded by cereal crops.

The site of Cernavoda NPP is bordered to the north by Cismelei Valley, and to the south – west by County Road (DJ) 223. The closest Natura 2000 sites are Canaralele Dunarii (ROSCI0022) and ROSPA0002 "Allah Bair – Capidava, and may be the most susceptible in terms of biodiversity impact, given the proximity to the Cernavoda NPP platform and their location downstream the cooling water discharge outlet into the Danube.

No biodiversity studies have been conducted, no such studies have been requested by the authorities. NuclearelectricaServ has no sites located in biodiversity sensitive areas or in their vicinity.



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## SNN Group Biodiversity and ecosystems



Description of the processes pursued to identify and assess the material impacts, risks and opportunities related to biodiversity and ecosystems | IRO-1



The biodiversity-related impacts, risks and opportunities are identified and assessed as part of the dual materiality assessment, in an internal workshop, as well as by consulting other literature sources, as well as the studies and surveys conducted to underpin the issue of the

operating and environmental permits, and the risk registers, as put together for each risk area. These are summarized in the table below and are addressed in the following sections.

Biodiversity			
Topic	Sub-topic	Sub-sub-topic	Impact
Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Pollution	<b>Potential, negative impact:</b> Heat pollution of the Danube water exceeding the temperature gradient regulated under the Water Management Permit. <i>(Applicable only for Cernavoda NPP)</i>
Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Others	<b>Potential, negative impact:</b> Serious consequences for the environment and population in case of a nuclear accident. <i>(Applicable only for Cernavoda NPP)</i>
Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Others	<b>Current, positive impact:</b> Creation of biodiversity-dedicated spaces <i>(Applicable at the SNN Group level)</i>
Biodiversity and ecosystems	Impacts on the extent and condition of ecosystems	Soil sealing	<b>Potential negative impact</b> on biodiversity due to infrastructure extension and land use change, which may lead to soil sealing. <i>(Applicable only for Pitesti NPP)</i>

The dependencies on biodiversity and ecosystems and their services have been taken into account in the assessment of the impacts, risks and opportunities. No applicable or significant impacts arising from dependencies or in any way affecting the ecosystems or ecosystem services have been identified.

In 2025, the impacts, risks and opportunities related to consumers and end-users were reassessed against those identified in 2024. The impacts, risks and opportunities identified in the previous year were rewarded and specifically reclassified at an individual sub-sub-topic level for each matter. The impacts, risks and opportunities



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previously identified have been reworded where necessary for clarity, but there were also impacts, risks or opportunities newly identified on certain aspects. The analysis and reassessment identified relevant and material impacts only on the sub-sub-topics related to "Pollution", "Others" and "Soil sealing".

The materiality assessment identified and assessed all physical and transition risks as proposed by the "Classification of climate-related hazards" (Commission Delegated Regulation (EU) 2021/2139) and the "Examples of climate-related transition events" (examples based on the TCFD classification). The material physical and transition risks have been presented in the Climate Change chapter (E1).

Risks relevant to the specific activities and business models of the entities, or related to actual or potential impacts at SNN Group or entity level, have also been identified. No significant risks or opportunities have been assessed for this exercise.

For both the existing activities, and the new activities to be carried out on the SNN Group's sites, specific studies are conducted also by independent external parties to assess the impact on the environment, including in terms of biodiversity, or the impact on communities. The SNN Group involves in research parts of the populations identified as possibly affected or exposed to hazards or risks caused by the activities of the sites. In doing so, the Group makes sure that it complies with the limits set under the relevant legislation and by the regulatory authorities. Where remedial actions are needed, these are implemented at site level.



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## SNN Group Biodiversity and ecosystems

The Transition Plan and consideration of biodiversity and ecosystems in the business strategy and model | E4-1



## SNN Group Biodiversity and ecosystems

Policies related to biodiversity and ecosystems | E4-2



The biodiversity-related impacts, dependencies, risks and opportunities have been dealt with in the double materiality assessment, a process that has been repeated and revalidated for the 2025 reporting year in order to identify any relevant and significant issues arising from the SNN Group's strategy, business model, activities or correlation with the positive or negative impacts that the SNN Group has or may have. At this time, no Transition Plan considering the biodiversity and ecosystems in the business strategy and model has been devised. For the biodiversity-related topics, no significant risks have yet been identified. The Climate Transition Plan has been presented, and meets the requirements of the ESRS E1-1 standard, under the "Climate Change" chapter.

A Biodiversity Policy (2024) has been devised to set out the commitments and measures for Cernavoda NPP and Pitesti NPP, such as:

- Protect and conserve biodiversity at all stages of operations.
- Prevent and minimise impacts on local and regional ecosystems.
- Integrate the sustainability principles in the Company's activities.
- Actively work together with authorities, environmental organisations and local communities.

The basic principles of the Biodiversity Policy are:

- **Ecological Caution** – Apply the precautionary principle to avoid biodiversity degradation.
- **Corporate Responsibility** – Adopt proactive environmental protection policies.
- **Transparency** – Clearly report on impacts and mitigation measures.

- **Collaboration** – Work together with the environmental institutions and local communities.
- **Monitoring and Improvement** – Continuously assess the impacts on biodiversity.

This Policy applies to everyone:

- SNN Group's sites, including the existing and planned units.
- Employees and contractors, who must comply with the measures set therein.
- Decision-makers, to include biodiversity protection criteria.

The implementation and enforcement of the policy will be coordinated by the **Environmental Protection, Environmental Laboratory and Radiation Protection Service**, which is in charge of overseeing the implementation and reporting, as well as the application of the environmental measures in day-to-day activities. Also, the **Communication, Sustainability and Investor Relations Directorate** is working to integrate biodiversity into the corporate strategy.

### Cernavoda NPP

According to the issued regulatory acts, temperature limits have been imposed on the process water discharged into the second bay of the Danube – Black Sea Canal and into the Danube, respectively into the stilling basin of the CHE Recuperare and into the Danube, in order to prevent an impact on the components of local biodiversity. The monthly analyses carried out on the basis of the Protocol on the methodology of monitoring the use of water resources and wastewater reception in water resources,

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elaborated by the Dobrogea – Seashore Water Basin Administration, indicate the compliance with the obligations established by the Environmental Permit and the Water Management Permit.

The survey Impact of the operation of Cernavoda Nuclear Power Plant on the Aquatic and Terrestrial Organisms in its Area of Influence was conducted in years 2008 – 2012 and was followed up in 2013 – 2016 under the programme for monitoring the impact of the Cernavoda Nuclear Power Plant’s operation on the aquatic and terrestrial organisms in its area of influence, did not highlight any material impact Cernavoda NPP’s operation on the local biota.

In the event of impact on biodiversity as a result of a nuclear accident, SNN Group has policies in place to ensure nuclear safety, protection against ionised radiation, and environmental protection. At the operational level, each unit generating environmental externalities has implemented procedures on nuclear safety and environmental protection, including the monitoring of risk factors related to nuclear activities.

The areas dedicated to biodiversity, i.e. the green spaces within the facilities are maintained mainly for decorative purposes and cannot be considered as natural areas of conservation value. The modest structure of the vegetation cover is generally dominated by ruderal and synanthropic species. From the point of view of biological productivity as an indicative element to define biodiversity indices, plant species such as *Agropyron repens*, *Artemisia vulgaris*, *Ballota nigra*, *Capsella bursa*

*pastoris*, *Cardaria draba*, *Carduus acanthoides*, *Plantago major*, *Rosa sp.*, *Xanthium strumarium*, etc. have been identified on SNN’s sites. However, the carrying capacity of habitats for bird species indicated a (maximum) nesting potential for *Parus major*, *Lanius minor*, *Alauda arvensis*, *Passer domesticus*, *Pica Pica*, *Columba livia*, etc., common species with a low degree of importance in terms of local biodiversity (of low interest according to the IUCN Red List).

According to the report produced further to the campaigns carried out in 2016 in the area of influence of Cernavoda NPP, no atypical changes in the structure of plant associations were observed. From an artificial association – *Lolium* and *trifolium* – the turf that was part of the original landscape architecture – we have now a “new ecosystem”, with a greater number of new plant species, the seeds of which have been carried naturally by birds or wind, increasing their variability. The evolution of plant associations from “simple” (a few) to “complex” (several species with a specific spatial arrangement) points to favourable conditions (unaltered by the plant’s activity) for growth in the NPP ecosystem and for amplification of the gene pool diversity.

Also, according to the same survey, there is no need to intervene in the evolution of the ecosystem, and the signs of vegetation amplification and diversification support this claim. Snails, fish, birds, insects, etc. can be turn to account to justify the biosensors existing in the ecosystem, which a clear sign, even to non-connoisseurs, the existence of a clean environment.

The non-significant impact on biodiversity was independently assessed also in the document named “Refurbishment of Unit 1 of Cernavoda NPP and expansion of the I Intermediary Spent Fuel Storage Facility with MACSTOR 400 type modules”. The study was carried out by independent experts and assessed all sites in the region.

Cernavoda NPP carries out environmental impact assessment studies or analyses with independent entities, beyond any influence from the Company. Every matter resulting from these analyses is turned into actions that Cernavoda NPP implements.

#### Pitesti NFP

The revised environmental permit of Pitesti NFP does not set out any specific requirements for biodiversity and ecosystems. In 2015, the Environmental Impact Report was prepared for the project Construction of the Technical Outbuilding for ventilation equipment and chiller platform (ventilation and air – conditioning works in Hall IV). The purpose of this report was both to assess the environmental impact of the project’s implementation, and to assess the cumulative impact on the operation of Pitesti NFP. Under the biodiversity chapter, the conclusion was that the activity of Pitesti NFP has no impact whatsoever on biodiversity.

Moreover, in 2024, NFP Pitesti prepared the Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety and health, emergencies, physical protection, control of nuclear safeguards, cyber security, and protection of classified



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information, where the management Pitesti NFP committed to take all necessary measures for the monitoring, assessment and continuous improvement of the environmental performance, pollution prevention, sustainable use of resources and biodiversity conservation.

The materiality assessment has identified no significant physical and transition risks and opportunities. However, the Biodiversity Policy has identified a number of general for Cernavoda NPP, Pitesti NFP and FPCU Feldioara.

## SNN Group Biodiversity and ecosystems

### Actions and resources related to biodiversity and ecosystems | E4-3



#### Cernavoda NPP

The biodiversity and ecosystems-related actions in Cernavoda NPP are provided in the Environmental Monitoring Programme. Thus, the Company makes sure that the authorised emission parameters are monitored and maintained.

The Environmental Monitoring Programme requires monitoring of the environmental factors water, air, noise, soil/subsoil, from a both radiological and non-radiological point of view. So far, there have been no cases of damage to biodiversity and climate, and therefore Danube water temperature, that would require remedial measures or significant capital expenditure, the limit values imposed by the regulatory acts in force not being exceeded.

Monitoring should be carried out during the operation of the installation to identify potential impacts on local biodiversity components. Remedial measures can be applied only in the case of exceeding the limits of the monitored indicators, in which case the specialised staff intervenes with appropriate solutions.

In the absence of events with a negative effect on biodiversity and ecosystems, generated by the activity of the NPP, no actions or plans have been established for the specific management of this aspect. Monitoring of environmental components is sufficient to prevent possible negative impacts.

The environmental monitoring activity does not involve significant operational or capital expenditure. Below are the environmental matters included in the monitoring program as well as the sampling frequency.

- Particulates in the air – continuous
- Iodine in the air – continuous
- Tritium in the air – continuous
- Gaseous C – 14 – continuous
- TLD – continuous
- Surface waters – weekly

- Water (CCW canal) – continuous/weekly
- Rainwater – Monthly depending on the weather conditions
- Sweep water – Monthly
- Deep groundwater – monthly
- Drinking water – monthly
- Soil – biannual
- Sediment – biannual
- Atmospheric deposits – continuous/ monthly
- Spontaneous vegetation – monthly May – October

#### Pitesti NFP

The environmental monitoring program, foreseen in the revised Environmental Permit of NFP, implies the monitoring of all environmental factors, namely water, air, noise, soil, vegetation from both radiological and non-radiological point of view. In the absence of events with a negative effect on biodiversity and ecosystems, generated by the activity of Pitesti NFP, no actions or plans have been established for the specific management of this aspect. Monitoring of environmental components is sufficient to prevent possible negative impacts.

The following environmental matters are included in the Monitoring Programme established by the revised Environmental Permit issued for the Pitesti NFP:

- Radioactive wastewater – before its discharged into ICN's Treatment Plant
- Surface water – quarterly
- Sediment – half-yearly
- Groundwater – monthly
- Rainwater – continuous
- Domestic wastewater – monthly



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- Gaseous Radioactive Effluents – continuous
- Gaseous Non-Radioactive Effluents – half-yearly
- Outdoor ambient – daily for six out of seven sampling points for the uranium concentration, and monthly for the beryllium concentration
- Atmospheric deposits – monthly
- External radiation doses – monthly
- Dose rates – weekly
- Noise – yearly
- Soil and vegetation – half-yearly/yearly

#### FPCU Feldioara

FPCU Feldioara SRL has approved an annual Environmental Monitoring Programme which requires the monitoring of the environmental factors water, air, soil/subsoil, from a both radiological and non-radiological point of view. So far, there have been no cases of damage to biodiversity and climate that would require remedial measures or significant capital expenditure; thus, the environmental management system does not imply definition of actions related to biodiversity.

The following environmental matters are included in the Monitoring Programme established by the Environmental Permit issued for the unit:

- Waste water – physical and chemical indicators: bi – monthly (own laboratories), monthly (accredited laboratories)
- Waste water – radiochemical indicators: weekly and bi – monthly
- Air – monthly
- Soil/Vegetation – half-yearly/yearly

For each site (Cernavoda NPP, Pitesti NFP and FPCU Feldioara), an Environmental Protection Plan is prepared to articulate the measures put in place to prevent and control any negative external environmental matters (air emissions, wastewater, waste, hazardous substances). By implementing this action, the risk of any impact on fauna and flora species adjacent to the SNN Group sites is kept down to a minimum.

General measures to control and address the impacts on biodiversity:

- Reduce light and noise pollution to protect wildlife.
- Manage the use of water resources.
- Fit eco-friendly filters for industrial wastewater.
- Monitor the water quality to protect aquatic life.

Additionally, a Biodiversity Action Plan (BAP) will be prepared for Cernavoda NPP, including:

- Measures to restore the habitats damaged by infrastructure.
- Wildlife corridors to allow wildlife migration.
- Programmes of afforestation and replanting of local vegetation.
- Elimination of the invasive species affecting biodiversity



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## SNN Group Biodiversity and ecosystems



### Targets related to biodiversity and ecosystems | E4-4



Taking into account the activity carried out by the SNN Group entities and their localisation, it was not necessary to set targets related to biodiversity and ecosystems. The protection of biodiversity and local ecosystems is achieved by monitoring the environmental external matters related to each SNN Group unit.

#### Cernavoda NPP

In Cernavoda NPP, no actual impacts material enough have been identified in the studies conducted and following the monitoring of environment factors so as to require the setting of biodiversity and ecosystems-related targets have been identified; only the values of the parameters are monitored against the environmental and water management permits.

#### Pitesti NFP

The environmental management system of Pitesti NFP does not require setting any biodiversity targets.

Based on the findings of the above mentioned studies, the NFP activity does not have a significant impact on biodiversity. In addition, Pitesti NFP is an EMAS registered organisation, and in Annex IV of Regulation (EC) 1221 of 2009, as subsequently amended and supplemented, one of the indicators refers to biodiversity. Considering the NFP surface, which is dominated by concrete areas (alleys, platforms, etc.), less green spaces, the environmental verifier did not consider it appropriate to establish such an indicator. With regard to EMAS, the indicator for biodiversity refers to "land use", expressed in square meters of land.

#### SNN Headquarters

Due to the location of the site as well as the M3 urban profile (mixed subzone with buildings) of the area, the activity carried out in the headquarters does not require the establishment of biodiversity and ecosystems targets.

#### FPCU Feldioara

FPCU Feldioara SRL has approved an annual Environmental Monitoring Programme which requires the monitoring of the environmental factors water, air, soil/subsoil, from a both radiological and non-radiological point of view. So far, there have been no cases of damage to biodiversity and climate that would require remedial measures or significant capital expenditure. The analysis reports resulting from the monitoring program do not indicate that the limit values imposed by the applicable legislation have been exceeded. All results obtained are communicated to environmental protection institutions. In FPCU Feldioara SRL, the environmental management system does not require setting any biodiversity targets. Also, it is not necessary to set targets in relation to the potential negative impact of noise generated by the different activities on the industrial platform as it will occur periodically and not continuously.

#### EnergoNuclear

EnergoNuclear has no sites located in biodiversity sensitive areas. Consequently, no biodiversity and ecosystem targets have been set.

#### NuclearelectricaServ

NuclearelectricaServ has not set biodiversity and ecosystem targets.



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## SNN Group Biodiversity and ecosystems

Impact metrics related to biodiversity and ecosystem changes | E4-5



The Biodiversity Policy sets out performance indicators to assess the effectiveness of the conservation measures (for entities where this is applicable):

- **Number of protected species conserved** in the areas of influence.
- **Water and soil quality** in the vicinity of the facilities.
- **Reducing noise and light pollution** in natural areas.
- **The effectiveness of ecological offsetting measures** for biodiversity.

For the impact indicator applicable to Cernavoda NPP, the temperature of treated water discharged into the Danube waters, the monitoring carried out did not identify any maximum permissible limits that have been exceeded so far, that would require the establishment of impact indicators related to biodiversity and ecosystems. Only the parameter values according to the environmental and water management permits are followed.

Also, no nuclear accidents have been recorded so far, and no impact indicators were required to be established.

Information on sites and protected areas in their proximity has been included in the chapter *“Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)”*.

## SNN Group Biodiversity and ecosystems

Anticipated financial effects from biodiversity and ecosystem-related significant risks and opportunities | E4-6



No detailed quantification of the anticipated financial effects has been conducted in monetary terms, before considering the biodiversity related actions. As part of the materiality assessment, the risks and opportunities identified were assessed to be of low materiality, between 12% and 24%, with a low likelihood of occurrence and without giving rise to any material financial effect for the SNN Group.



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# SNN Group ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY



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# SNN Group – Resource use and circular economy

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## SNN Group Resource use and circular economy



Description of the processes pursued to identify and assess the material impacts, risks and opportunities related to the use of resources and circular economy | *IRO-1*



The circular economy-related impacts, risks and opportunities are identified and assessed as part of the dual materiality assessment, in an internal workshop and in consultation with external stakeholders, as well as by consulting other literature sources, as well as the studies and surveys conducted to underpin the issue of the operating and environmental permits, and the risk registers, as put together for each risk area. These are summarized in the table below and are addressed in the following sections.

Topic	Sub-topic	Sub-sub-topic	Impact(s)
Resource use and circular economy	Resources inflows, including resource use	n/a	<b>Current, negative impact:</b> Use of certain resources, such as technical-grade uranium concentrate/uranium dioxide powder, zircaloy-4, beryllium metal or substances in the category of drug precursors and explosives precursors, for production of nuclear fuel ( <i>Applicable only for Pitesti NFP and SNN HQ</i> ).
Resource use and circular economy	Waste	n/a	<b>Current, negative impact:</b> Generation of waste within operations and facilities ( <i>Applicable at SNN Group level</i> ).

The impact related to resources inflows is applicable and material only for Pitesti NFP. The risks and opportunities analysed in the materiality assessment for the Circular Economy area were insignificant.

## SNN Group Resource use and circular economy



Policies related to resource use and circular economy | *ESRS E5-1*



SNN Group supports the rational use of energy and natural resources, striking a balance between environment, energy and economy.

### Cernavoda NPP

The commitment to the rational use of resources is described in the Integrated Management System Manual of Cernavoda NPP. It is also envisaged that the technologies used and the products and equipment purchased meet the acceptability criteria for the minimum reasonable technological impact on the environment.



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By design, the nuclear units include also technical, administrative and procedural means and measures to control and monitor the activities and equipment likely to affect the staff, the environment and the population, with a view to eliminating and/or minimising the risks attached to harming the environmental factors.

Cernavoda NPP promotes the rational use of energy and natural resources, striking a balance between environment, energy and economy, as stated in the Integrated Management System Manual. This commitment translates into: integration of the sustainable development concept into projects and investments, compliance with the domestic and Community legislation, and with the permits and environmental protocols and agreements, and continuous improvement of environmental performance.

Cernavoda NPP has devised and put in place specific requirements to support minimisation/elimination of any potential negative impact on the environment resulting from the plant's activities. Thus, as a legal entity holding waste, classifies each type of waste generated from its own activity according to the legal provisions in force. Such classification is subject to the provisions of the Government Decision no. 856/2002. Cernavoda NPP Branch, according to the Environmental Permit, does not carry out treatment, recovery, recycling and disposal of the generated non-radioactive waste, as defined by Law no. 92/2021, as amended and supplemented to date. Domestic transport (on national public roads) of non-radioactive chemical waste is carried out in accordance with the specific legal provisions (ADR rules

and Government Decision no. 1061/2008). Cernavoda NPP does not carry out any non-radioactive waste export operations.

#### Pitesti NFP

In Pitesti NFP, an environmental analysis is carried out every year to assess both the inputs to the process, i.e. resources, raw materials, materials and utilities, and the outputs from the process, i.e. products, waste generated, etc. The environmental analysis addresses both the environmental risks and the related opportunities. The risk attached with inflows of resources, raw materials and materials in NFP is identified, assessed and documented in a risk data – sheet, where controls were determined.

Also about resources consumption, a financial performance risk was identified consisting of the exceeding of the specific rated consumptions, which would lead to both higher costs and an increased consumption of resources.

Under NFP's Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety and health, emergencies, physical protection, control of nuclear safeguards, cyber security, and protection of classified information, NFP commits to take all necessary measures for the Monitoring, assessment and continuous improvement of the environmental performance, pollution prevention, sustainable use of resources and biodiversity conservation". There are no other external (third party) standards or initiatives which Pitesti NFP has committed to comply with in application of this policy.

This commitment is reflected in work procedures that detail how to identify, assess and manage the identified environmental matters, including those related to the use of resources: water, energy and materials.

The commitment to a rational use of resources was documented in the Policy on nuclear safety, quality, protection against ionising radiation, environment, occupational safety and health, control of nuclear guarantees, cyber security, and protection of classified information, and in the Environmental Statement, which are documents approved by Pitesti NFP Manager. This policy involves, among other things, the integration of the sustainable development concept into projects and investments, compliance with the legislation and with the environmental protocols and continuous improvement of environmental performance.

At entity level a recovery process is implemented for the resulting non-compliant materials in order to optimise consumption.

For policy development, Pitesti NFP has identified its stakeholders, namely SNN HQ, NPP as a customer, authorities, neighbours – RATEN ICN, ANDR, the public and the local community, employees, trade unions, etc., as well as their expectations, namely provision of a quality product, compliance with the regulations and requirements for environmental protection, permitting, as applicable in the field of activity, open communication, creation a healthy climate for employees, etc.

The stakeholder, and applicable legal and regulatory,



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requirements are taken over and integrated into the integrated management system processes, activities and documentation, and the set of verification, monitoring and control activities aims not only to meet these requirements, but also to increase stakeholder satisfaction.

In terms of waste management, Pitesti NFP envisages complying with the waste ranking principles; thus, the first step is to prevent waste generation, followed by its reuse, recycling, other recovery and, finally, disposal or landfilling.

Considering the operational environment and the resources that Pitesti NFP uses, the policies and procedures related to the circular economy do not include aspects related to sustainable sourcing and use of renewable resources.

### SNN Headquarters

The environmental protection and waste management activities of the SNN HQ are covered by procedures, and are applied by all staff (own staff and contractors) who, through their own activity, can generate, collect, transport and temporarily store waste. The flow of waste management activities starts with identification of the types of waste generated, continues with the setting up selective waste collection points, collection and temporary storage of the waste generated, delivery of the waste generated to authorised companies based on the waste management records, centralisation of the data on selectively collected waste, and quarterly reporting to the National Environmental Protection Agency (ANPM).

The SNN HQ's waste management procedure sets out the specific responsibilities for environmental protection and waste management activities in the SNN HQ.

### FPCU Feldioara

FPCU Feldioara SRL has implemented a Quality Management System in the nuclear field. Products and equipment that meet the minimum acceptance criteria on environmental elements have been implemented in the technological process.

This subsidiary implements and applies documented waste management procedures, which regulate selective collection, temporary storage, handling, transportation and disposal of waste, in accordance with the environmental legislation in force, as follows:

- The plan for the management of extractive waste resulting from the processing and concentration of uranium ore in order to obtain and refine technical-grade uranium concentrate;
- Waste management, code S – PM – 06;
- Measurement and record-keeping of mass activity and surface contamination of low-level solid radioactive waste, code S – RP – 24;
- Identification, sorting, and verification of radioactive contamination of metallic waste/resins, code S – RP – 20;
- Collection, preparation and transportation of low-level solid radioactive waste for disposal, code S – RP – 26;
- Emergency response to nuclear incidents occurring during collection, preparation, transportation and storage of solid radioactive waste; preventive measures, response method, record-keeping and

reporting, code S – RP – 27;

- Assignment of identification codes, labelling, record-keeping and registration of containers loaded with solid radioactive waste to be transferred to Feldioara subsidiary for final disposal in the low-level solid radioactive waste disposal facility, code S – RP – 71.

The main stakeholders involved in/consultations held for, establishment of the Nuclear Quality Management System can be found in the Quality Manual.

The stakeholders relevant to the quality management system of FPCU Feldioara SRL are:

1. Internal stakeholders: employees, the Chief Technical Officer, the Deputy CEO, and the CEO;
2. External stakeholders:
  - a. Customers: Societatea Nationala Nuclearelectrica S.A. Bucharest, Societatea Nuclearelectrica S.A. – Pitesti NFP Branch;
  - b. A.N.R.S.P.S. – UT 515 Bucharest;
  - c. Suppliers: of materials and services, subcontractors, etc.;
  - d. Government: the local administration, authorities, regulatory and control bodies (CNCAN Bucharest, etc.);
  - e. Community (neighbours, NGOs, etc.).

The stakeholder Quality Management System is made available through a set of documented policies, procedures and other information, which define how to identify, analyse and deal with the relevant stakeholder requirements.



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This information is made known via the established internal and external channels, such as, for instance: official briefings, meetings, reports, and communication platforms, thereby ensuring the transparency and understanding of the applicable requirements.

The organisation ensures controlled access to the Quality Management System documents, depending on roles and responsibilities, including their periodic updating to secure compliance with the legal, regulatory and stakeholder requirements.

Due to the type of uranium ore preparation and processing plant/technical-grade uranium concentrates, all process inputs: raw materials (uranium ore, technical-grade uranium concentrates), materials, utilities that have entered the technological process become radioactively contaminated materials and are managed according to CNCAN legislation.

At unit level, an environmental analysis is carried out every year to assess both the inputs to the process, i.e. resources, raw materials, materials and utilities, and the outputs from the process, i.e. products, waste generated, etc.

All waste generated as a result of the activities carried out on the site of the unit are categorised as low – radioactivity solid waste and are disposed of by depositing them in the final disposal landfill existing on the site of the unit.

Liquid wastes go through a treatment process consisting

of three treatment plants (M2, M3, M4) in order to bring industrial wastewater within the maximum limits allowed by environmental and water legislation.

The entity's waste is generated on the industrial site. Preventive measures are provided by the activities to be carried out on the site have been implemented by work procedures minimising waste generation

For reuse, used materials and components that can no longer be reused for the activity for which they were made become generated waste and have a special disposal regime according to CNCAN legislation. There are no recycling or valorisation actions, the waste generated is deposited in the final disposal landfill for low – radioactivity solid waste existing on the site

The liquid waste is purified by the treatment plants resulting in a permeate that is discharged into the natural emissary and a concentrate (solid radioactive salts) that is deposited in the existing radioactive salts repository on site.

The proposed investment programme, which identified the need to improve certain ratios in the processing/preparation of uranium ore, included technical, administrative and procedural means and measures to control and monitor of the activities and equipment liable to affect the staff, the environment and the population with a view to eliminating and/or minimising the risks attached to harming the environmental factors

The unit undertakes to take the required measures to

monitor, assess and continuously improve the environmental performance, pollution prevention, sustainable use of resources and biodiversity conservation.

In terms of waste management, a policy has been adopted that respects the principles of waste prioritisation; thus the first step is the prevention of waste generation and disposal through waste disposal.

### EnergoNuclear

EnergoNuclear does not currently have a resource input policy in place and therefore significant impacts, risks and opportunities related to resource utilisation and circular economy are not addressed at entity level. There is a designated person responsible for the management of the waste resulting from the activity of the EnergoNuclear Headquarters. It provides the interface with the building owner, who is responsible for taking over this waste.

At this stage of the company, it is not necessary to develop a policy related to resource utilisation and circular economy, sustainable sourcing or general resource utilisation because the amount of waste resulting from EnergoNuclear's specific activity (office activity) is insignificant. Also, the waste generated on the site of Units 3 and 4 of Cernavoda NPP are managed by the contractors, according to the Environmental Protection Agreement, annexed to the contract.

### NuclearelectricaServ

The company NuclearelectricaServ provides services for Cernavoda NPP and on the NPP site with which it has



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signed Environmental Agreements in which the impacts and risks resulting from the provision of services are identified and by which it is obliged to comply with all legal requirements and Cernavoda NPP procedures regarding the use of resources and waste management.

Through the NuclearelectricaServ policy in the field of quality, environment and occupational health and safety, the management of the organisation is interested in ensuring high quality products and services made in the context of a responsible concern for the safety of the environment. The organisation's management considers the quality of the services offered and compliance with environmental regulations to be of paramount importance.

Through the integrated management system adopted, NuclearelectricaServ SRL management ensures that all activities performed by its employees are carried out in a controlled manner, in compliance with legal and regulatory requirements in the environmental field as well as contractual requirements. For the identification of environmental issues NuclearelectricaServ SRL has established procedures which specify the criteria for the activities it carries out and the responsibilities for the personnel involved.

## SNN Group Resource use and circular economy



### Actions and resources related to resource use and circular economy | ESRS E5-2



#### Cernavoda NPP

The refurbishment of the U1 nuclear plant corresponds to the second principle on which the circular economy is based: keeping products and materials at their highest use value for as long as possible.

U1 refurbishment refers to the capital repair, modernisation, and improvement by replacing and/or modifying the unit's equipment or systems to significantly extend the life of the unit. The refurbishment creates the opportunity to improve reactor safety. After refurbishment, the reactor's lifetime will be extended by a 30 – year cycle.

By implementing the U1 refurbishment and DICA MACSTOR 400 projects, the amount of additional energy

delivered to the National Energy System compared to the initial project is 720 million MWh.

Re-think (Symbol R1 in the “Strategic Framework 9R” of the Circular Economy Strategy) has been highlighted by the redesign of the MACSTOR 200 module, ensuring that the DICA modules occupy space more efficiently.

In the initial project, the energy delivered to the National Energy System (SEN) was 449 million MWh, and with the implementation of the RT-U1 and DICA MACSTOR 400 Projects, plus operation of Units 3 and 4 (with two operating cycles), it will become approximately 1,169 million MWh.

Consequently, in terms of avoiding greenhouse gas emissions such as CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub> – by implementing the RT U1 – MACSTOR 400 project, the additional amount of CO<sub>2</sub> that would have been emitted into the atmosphere if coal (lignite) had been used instead of nuclear fuel is 215,000,000 tonnes of CO<sub>2</sub>. This amount does not include CO<sub>2</sub> equivalent emissions of nitrogen dioxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>) of about 94.5 million tonnes of CO<sub>2</sub> – CH<sub>4</sub> equivalent and 10.5 million tonnes of CO<sub>2</sub> – N<sub>2</sub>O equivalent: the benefits of U1 refurbishment in terms of reducing environmental pressure by replacing greenhouse gas emitting fuels.

While renewable energy and efficiency measures are vital components of a sustainable energy mix, they currently lack the capacity to replace reliable and consistent nuclear power generation, especially during periods of low renewable generation, such as calm windless weather or



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overcast conditions. In addition, nuclear energy is an integral part of Romania's climate change commitments, as it produces minimal greenhouse gases. This positions nuclear energy as a complementary source alongside renewables to address both energy security and environmental objectives. The constant operation of nuclear installations thus plays an essential role in Romania's energy system, providing a significant and reliable source that supports the stability of the energy grid and balances the variability of renewable sources.

### Pitesti NFP

In the manufacturing process, Pitesti NFP has implemented a process to recover the resulting non-compliant materials, with the aim of optimising consumption, recycling the resulting non-compliant materials and, implicitly, reducing the impact on the environment. Non-compliant nuclear materials resulting from the pill manufacturing processes are collected by category (powder, pellets, raw pills and sintered/rectified pills, rectification sludge, etc.) and stored until transferred to the powder supplier for recycling and conversion into compliant UO2 powder, which is later returned to Pitesti NFP to be reintroduced in the manufacturing process. Incinerable radioactive solid waste and radioactive liquid waste (contaminated with uranium) are transferred to the Radioactive Waste Treatment Station of ICN Pitesti for uranium treatment and recovery in the form of uranium ash and uranyl hydroxide, which materials are then returned to NFP and subsequently managed as non-compliant nuclear material.

In order to implement the waste hierarchy principle,

several measures have been taken in Pitesti NFP, as follows:

- to increase the degree of selective waste collection – the purchase of containers for selective collection according to Law no. 132/2010 on selective waste collection in public facilities, i.e. a better segregation of waste.
  - to reduce the amount of paper waste from office activities, electronic signature has been introduced and a document analysis platform has been created to avoid the printing out of documents.
  - in the production and maintenance activities, the primary focus is on repair and reuse of parts and components, whenever possible.
  - when dismantling/taking out of service any equipment, those components that can be reused are retained and not disposed as waste.
  - the zircaloy – 4 waste resulting from the process, at takeovers and quality controls, are collected under controlled procedures and are transferred to authorised companies for processing and turning into various zircaloy – 4 materials which can be used in other industries.
  - noncompliant nuclear material resulting from the process flow is controlled – collected to be transferred for processing in the Uranium Concentrate Processing Plant, and is then returned to NFP as compliant UO2 sinterable powder.
  - radioactive liquid waste (DLR) and incinerable radioactive solid waste (DSRI) are sent to RATEN – ICN for treatment/incineration to recover the contained uranium, and the resulting materials (uranyl hydroxide and uranium ash) are returned to NFP as noncompliant nuclear material, which is then transferred to FPCU for uranium recovery and production of compliant UO2 sinterable powder, which is sent to NFP and fed into the flow as a feedstock.
  - the personal protective equipment waste (gowns, overalls, T – shirts) is collected separately, i.e. the waste used in controlled areas where there is a risk of radioactive contamination is separated from the waste used in areas under radiological surveillance. This increased the degree of recycling textile waste which are disposed of as non-hazardous waste, to the detriment of its incineration (if, after decontamination and dosimetric measurements, it is found to be contaminated).
  - metal packages, i.e. metal barrels used to collect used oils and emulsions – NFP asked collectors to return the containers to be reused for collection of the same kinds of waste.
  - Inclusion of a requirement for the supplier to take back the packages for reuse, free of charge, in the tender books for the procurement of hazardous substances (acetone, ethyl alcohol and hydrochloric acid).
- Keeping records of the paper waste quantities existing at the organisational level and that cannot be quantified as office activity. Concerning the reuse of dismantled parts, there are reports that have determined which components would be reused. As to the liquid waste transferred to RWTP for uranium recovery and return to NFP, there are documents showing these aspects. These are materials that fall under the nuclear safeguard control.



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## SNN Headquarters

The following measures have been taken at the Headquarters in order to implement the principle of waste prioritisation:

- in order to increase the selective waste collection, selective waste collection bins were purchased in accordance with Law 132/2010 on selective waste collection in public institutions and were distributed in the common areas of the Headquarters
- internal information and empowerment campaigns have been carried out to reduce the amount of paper waste from office activities (e.g. "Good deeds for future generations – Print responsibly!")

As a result of these measures, the share of selectively collected waste increased from 14% to 36% of the total amount of waste generated by the SNN HQ.

## FPCU Feldioara

In the technological process, the recovery of raw materials that could be non-conforming after processing along the entire technological process was implemented by way of working procedures.

Regarding the waste generated by the work procedures, measures have been implemented to reduce the consumption of materials needed in the technological process.

- to reduce the amount of paper waste from office activities, electronic signature has been introduced and a document analysis platform has been created to avoid the printing out of documents.
- in the production and maintenance activities, the

primary focus is on repair and reuse of parts and components, whenever possible.

- when dismantling/taking out of service any equipment, those components that can be reused are retained and not disposed as waste.

Internal correspondence between departments/branches takes place via electronic mail and the intranet platform, in order to reduce paper use and decrease the amount of paper waste generated by the office activity.

The use of digital channels for transmission of internal documents and information has reduced the need for printing, thus contributing to more efficient administrative processes and to environmental protection.

After having implemented the abovementioned measures, a progressive reduction in the quantities of paper waste has been observed, as follows:

- **in the short-term**, reduced paper consumption and volume of generated waste;
- **in the medium-term**, significantly reduced amount of paper waste and optimised related costs;
- **in the long-term**, a maintained low level of paper waste through digitalisation and adoption of sustainable practices in the day-to-day business.

In the production and maintenance activities, the key focus is on **repair and reuse of parts and components**, whenever possible. FPCU Feldioara has **its own** mechanical workshop, **where lathe machining operations are performed**. The vast majority of the parts are refurbished and reused in the process flow. By

carrying out these operations, the aim is to extend the service life of the parts, reduce the need to purchase new components and reduce the amount of generated waste.

## Measures

- perform the technical evaluation of the defective parts and components in order to determine the possibility of repair;
- perform the repair and reconditioning work as part of the maintenance activities;
- use the reusable parts in the production processes, in compliance with the quality and safety requirements;

## Expected results

- reduced quantities of waste from parts and components;
- reduce consumption of raw materials and natural resources;
- lower acquisition and waste disposal costs;

When certain equipment was dismantled or decommissioned, **components that can be reused** (e.g., valves, pipes, flanges, pumps) **were recovered and kept**, and were subsequently used as spare parts in other process flow nodes. This practice allows an optimal use of the existing resources, reduces the need to purchase new components and minimises the amount of generated waste.

## Implemented measures

- **Identification of reusable components:** before dismantling, equipment is examined to determine which parts can be reused;



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- **Recovery and storage:** selected components are extracted, cleaned and stored in special areas to be protected and easily accessible;
- **Redistribution and integration in the process flows:** the recovered parts are used as spare parts in other equipment or production processes, thus extending their lifetime;

**Results and benefits**

- reduced cost of purchasing new parts;
- reduced amount of waste generated from decommissioned equipment.

**EnergoNuclear**

The entity has not established actions related to resource utilisation and circular economy. EnergoNuclear has not established an action plan related to resource utilisation and circular economy. Thus, no significant operational and capital expenditures are required.

**NuclearelectricaServ**

Since Nuclearelectrica Serv SRL carries out activities on the site of Cernavoda NPP, the waste generated from the services it provides are collected and managed by Cernavoda NPP.

**SNN Group  
Resource use  
and circular  
economy** 

**Targets related to  
resource use and circular  
economy**  
| *ESRS E5-3, ESRS 2 MDR - T*

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The targets per entity were estimated on the basis of data published in the financial year 2023 and taking into account the expansion of production capacity until 2030. Given the specific nature of the activities and production of the SNN Group entities, aspects such as sustainable sourcing or the use of renewable resources have not been taken into account in setting the targets. If no legal limit or mandatory norm is specified, the target set has not been influenced by these aspects.

The targets have been set on a voluntary basis, with no maximum limits allowed in the legislation. The targets set are given by the specifics of each entity and take into account any possible future events (such as production expansion, new investment targets, etc.) in estimation. For the waste management targets, the SNN Group has defined a waste ranking, which is divided into non-radioactive waste (hazardous and non-hazardous) and radioactive waste (solid, solid-liquid mixtures and organic liquids). These can be further broken down according to the type of disposal (recycling, disposal, non-recyclable waste, etc.), as it can be seen in chapter (E5-5) "Resources outflows". For certain types of waste, there are limits imposed under the operating permits and licenses, and the targets have been set to reduce or maintain that limit level imposed under the permit/license.















Given the profile of SNN Group's activity, the possibilities to implement circular economy aspects are limited. But the company has set targets for more efficient use of raw materials, as well as measures to recycle certain types of waste generated. SNN Group supports the rational use of energy and natural resources, striking a balance between environment, energy and economy.


**Cernavoda NPP**

In Cernavoda NPP, according to the design, the amount of nuclear fuel bundles is constant. Since the degree of use of these bundles is based on a physical and chemical calculation, the amount varies only slightly. In this regard, no targets have been set for the use of these resources, nor is this the case, as providing energy at national level is contrary to the resources economy in this regard.



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Internally, one of the programmes currently in progress, with immediate benefits in terms of reducing the use of resources, is the programme to reduce the internal electricity consumption by replacing the plant's lighting system from incandescent bulbs to eco – lighting, or by acquiring only that equipment that ensures a reduced energy consumption.

Circular economy metrics Targets for Cernavoda NPP	MU	Base year 2023*	Target for 2030	Target for 2035	Target for 2040	Target for 2045	Target by 2050
<b>Waste separation and recycling</b>	t	138.42	1,821.72	850.52	2,112.28	896.9	896.9
<b>Energy consumption</b>	MWh	3,082.09	4,100.78	4,100.78	4,100.78	4,100.78	4,100.78
<b>Water consumption</b>	Thousand cubic meters	2,406,608,752	2,574,688	2,485,607	2,485,607	2,485,607	2,485,607
<b>Raw materials consumption</b>	bundles	10,364	During U1 refurbishment , consumption is reduced to approximately 50%	During U2 refurbishment , consumption is reduced to approximately 50%	About 10,400	About 10,400	About 10,400
<b>Waste reduction (radioactive and non-radioactive)</b>	cubic m	6	36	48	60	60	60

The commitment to the rational use of resources is described in the Integrated Management System Manual of Cernavoda NPP. It is also envisaged that the technologies used and the products and equipment purchased meet the acceptability criteria for the minimum reasonable technological impact on the environment.

### Pitesti NFP

In order for Pitesti NFP to meet the environmental targets and the environmental indicators according to the *Environmental Performance Assessment* procedure, an Environmental Management Programme is devised to set measures/actions, owners and implementation time – limits. In accordance with the procedural requirements, evolution of the performance indicators is analysed on a monthly basis, so that, should there be found that there is a risk that these are not attained, corrective/preventive actions can be taken.

The identified risks are documented in risk records, where controls are also defined. These are reviewed and updated on a quarterly basis.

For the use of resources, Pitesti NFP has set the following indicators:

- **Electricity consumption by reference to the number of bundles produced** - Reduction by min. 0.1% of the electricity unit consumption in 2025 v 2023, by reference to the number of FBs produced (0.44 MWh/FB produced); the metric fell within the proposed target, with a of a reduction of 6.82%

	2021	2022	2023	2024	2025	2025	
						proposed	actual
<b>Amount of electricity used, MWh</b>	5,158	4,891	4,845	4,866	4,560	n/a	n/a
<b>Number of FBs produced</b>	11,000	10,826	11000	11,019	11,118	n/a	n/a
<b>Amount of electricity used/no. FBs produced</b>	0.469	0.452	0.44	0.441	0.410		



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- **Rational use of resources** - increase by at least 0.02% in the UO<sub>2</sub> powder processing yield in 2025 v. 2023 ( $\eta=95,63\%$ ), the metric fell within the proposed target, as a 0.22% increase was reported.

	2021	2022	2023	2024	2025	2025	
						Proposed	Actual
<b>The amount of uranium in the UO<sub>2</sub> pellet columns formed [kg]</b>	203,015.959	199,043.484	202,783.472	202,849.009	203,849.166	n/a	n/a
<b>Amount of uranium in UO<sub>2</sub> powder released for fabrication [kg]</b>	209,221.668	213,507.934	212,040.719	212,170.832	212,684.449	n/a	n/a
<b>Yield [%]</b>	95.09	95.34	95.63	95.61	95.85	95.65	95.85

- **Rational use of resources** - increase by at least 0.02% in the Zy – 4 tube processing yield in 2025 v 2024 ( $\eta=98,16\%$ ), %); the metric fell within the proposed target, as a 0.34% decrease was reported.

	2021	2022	2023	2024	2025	2025	
						Proposed	Actual
<b>Yield [%]</b>	97.46	97.55	97.87	98.16	97.82	98.18	97.82





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- **Rendering water consumption more efficient** - Reduction by at least 0.1% of the drinking water unit consumption in 2025 v 2024 by reference to the average headcount (14.23 cubic m/no. of employees); the metric fell within the proposed target, as a 12.58% reduction was reported.

	2021	2022	2023	2024	2025	2025	
						proposed	actual
<b>Amount of water used (m<sup>3</sup>)</b>	5,505	5,317	5,489	5,010	4,430	n/a	n/a
<b>Average number of employees</b>	338	341	350	352	356	n/a	n/a
<b>Ratio between the amount of water used and the average headcount</b>	16.3	15.6	15.68	14.23	12.44	14.22	12.44

No targets have been set for the waste hierarchy in Pitesti NFP; however, in 202, NFP has set an indicator associated with the objective of minimising the amount of incinerable radioactive solid waste generated, i.e. reducing the amount of incinerable radioactive solid waste generated in relation to the number of Fuel Bundles (FBs) produced. Maximum 0.30 kg/FB (which represents 55% of the maximum authorised amount of incinerable solid radioactive waste generated according to the environmental permit by reference to maximum authorised production, which is 0.56 kg/FB).

	2022	2023	2024	2025	2025	
					proposed	actual
<b>Amount of incinerable solid waste generated [kg]</b>	3,408.4	2,787.4	3,133.6	3,497.9	0.30	0.31



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Circular economy metric Targets for Pitesti NFP	MU	Standard consumption/ authorised quantity	Base year 2023*	Target for 2025	Target for 2030	Target for 2035	Target for 2040	Target for 2045	Target by 2050	Scenario 1 – 11000 FB Scenario 2 – 22000 FB	Explanations
Waste separation and recycling	Percentage	36%	50%	50%	55%	58%	60%	62%	65%	S1/S2	NFP aims to recycle/valorise as much waste as possible.
Energy consumption	MWh	N/A	4,845	5,000 (4,560 actual consumption in 2025)	5,300	5,300	5,300	5,300	5,300	S1	The increase in electricity consumption in the next period takes into account the needs of the NFP for the following: – heating (equipping some ventilation systems with electric batteries) – cooling (climate changes, high temperatures in the warm season require a high cooling capacity for production halls and offices. – air conditioning appliances) – hot water supply (for the decontamination of the personnel working in the production area, the possibility of installing boilers in the shower area for the supply of hot water quickly or increasing the capacity of existing boilers is being analysed) – NFP is planning to develop new projects (e.g.: 37M)
		N/A		5,000	5,300	6,700	6,700	6,700	6,700	6,700	S2
Drinking water consumption	cubic m	N/A	5,489	5,630 (4,430 drinking water consumption in 2025)	5,630	5,630	5,630	5630	5630	S1	Drinking water consumption was calculated in proportion to the increase in the number of employees. No additional fire water, cleaning water, or other process needs were considered.
				5,630	6,500	6,700	6,900	7100	7100	S2	Pitesti NFP has over time reduced its drinking water consumption to less than 50% of annual consumption through investments.



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








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Raw materials and direct materials consumption											
Name	MU	Estimated quantity based on standard consumption	Quantity consumed in 2023	2025	2030	2035	2040	2045	2050	S1 – 11000 FB S2 – 22000 FB	Standard consumption/FB Standard consumption of raw materials is the maximum quantity of raw materials used in the manufacture of one FB in accordance with the technological process used and under normal technical – organisational conditions of production. Provided that no changes in the technological processes with an impact on the standard consumptions are expected, these limits cannot be modified.
– UO <sub>2</sub> powder	tU	250	226	226 (2025: 212.58)	226	226	226	226	226	S1	standard consumption – 20.45 kg UO <sub>2</sub> powder/FB.
				226	226	452	452	452	452	S2	
– Zircaloy – 4 1.6 mm sheet	Kg	2,500	1,909	2,178 (2025: 2,131.69)	2,178	2,178	2,178	2,178	2,178	S1	standard consumption – 0.198 kg/FB
				2,178	2,178	4,356	4,356	4,356	4,356	S2	
– Zircaloy – 4 0.83 mm sheet	Kg	540	491	495 (2025: 484.76)	495	495	495	495	495	S1	standard consumption – 0.045 kg/FB
				495	495	990	990	990	990	S2	
– Zircaloy – 4 1.98 mm sheet	Kg	300	240	275 (2025: 229.92)	275	275	275	275	275	S1	standard consumption – 0.025 kg/FB
				275	275	550	550	550	550	S2	
– Zircaloy – 4 wire for skirts	Kg	650	465	528 (2025: 500.15)	528	528	528	528	528	S1	standard consumption – 0.048 kg/FB
				528	528	1,056	1,056	1,056	1,056	S2	
– Zircaloy – 4 bars for plugs	Kg	7500	6738	6,710 (2025: 5,804.55)	6,710	6,710	6,710	6,710	6,710	S1	standard consumption – 0.61 kg/FB
				6,738	6,738	13,420	13,420	13,420	13,420	S2	
– Zircaloy – 4 tubes for sheaths	Pcs.	469,920	431,267	428,890 (2025: 429,508)	428,890	428,890	428,890	428,890	428,890	S1	Standard consumption – 38.99 pcs/FB
				428,890	428,890	857,780	857,780	857,780	857,780	S2	



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Raw materials and direct materials consumption											
Name	MU	Estimated quantity based on standard consumption	Quantity consumed in 2023	2025	2030	2035	2040	2045	2050	S1 – 11000 FB S2 – 22000 FB	Standard consumption/FB Standard consumption of raw materials is the maximum quantity of raw materials used in the manufacture of one FB in accordance with the technological process used and under normal technical – organisational conditions of production. Provided that no changes in the technological processes with an impact on the standard consumptions are expected, these limits cannot be modified.
Zinc stearate	Kg	900	658	715 (2025: 601.02)	715	715	715	715	716	S1	Standard consumption – 0.065 kg/FB
				715	715	1.430	1.430	1.430	1.430	S2	
Beryllium	Kg	7.8	7.15	7.15 (2025: 7.23)	7.15	7.15	7.15	7.15	7.15	S1	Standard consumption – 0.65 grams of Be/FB
				7.15	7.15	14.3	14.3	14.3	14.3	S2	
Helium 4.8	Nm <sup>3</sup>	7,800	6,805	6,600 (2025: 6,595.04)	6,600	6,600	6,600	6,600	6,600	S1	Standard consumption – 0.6 Nm <sup>3</sup> /FB
				6,600	6,600	13,200	13,200	13,200	13,200	S2	
Colloidal graphite solution	Kg	825	720	825 (2025: 610.27)	825	825	825	825	825	S1	Standard consumption – 0.075 kg/FB
				825	825	1,650	1,650	1,650	1,650	S2	
Demineralised water	m <sup>3</sup>	720	660	660 (2025: 667.08)	660	660	660	660	660	S1	Standard consumption – 0.06 m <sup>3</sup> /FB
				660	660	1,320	1,320	1,320	1,320	S2	
Nitrogen	Nm <sup>3</sup>	18,000	16,500	16. 500 (2025: 16,677)	16. 500	16. 500	16. 500	16. 500	16. 500	S1	Standard consumption – 1.5 Nm <sup>3</sup> /FB
				16. 500	16. 500	33. 000	33. 000	33. 000	33. 000	S2	
Hydrogen	Nm <sup>3</sup>	140,760	129,030	129. 030 (2025: 130,414.14)	129. 030	129. 030	129. 030	129. 030	129. 030	1	Standard consumption – 11.73 Nm <sup>3</sup> /FB
				129. 030	129. 030	259. 060	259. 060	259. 060	259. 060	2	



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Name	MU	Estimated quantity based on standard consumption	Quantity consumed in 2023	2025	2030	2035	2040	2045	2050	S1 – 11000 FB S2 – 22000 FB		
Ethyl alcohol	L	1,634.4	1,498.2	1. 498.2 (2025: 704)	1. 498.2	1. 498.2	1. 498.2	1. 498.2	1. 498.2	1. 498.2	S1	Standard consumption Assembly Section – 0.088 L/FB Standard consumption Quality Control Service – 0.0183 L/FB (for SA) + 0.0061 L/FB (for SP) Total – 0.112 L/FB
				1 498,2	1 498,2	2. 996.4	2. 996.4	2. 996.4	2. 996.4	2,996.4	S2	
Isopropyl alcohol	L	1,800	1.085	1,650 (2025: 1,250)	1,650	1,650	1,650	1,650	1,650	1,650	S1	Standard consumption – 0.131 L/FB
				1,650	1,650	3,300	3,300	3,300	3,300	3,300	S2	
Argon 4.8, purity 99.996%	Nm <sup>3</sup>	2,520	2,054.4	2,310 (2025: 1,901.9)	2,310	2,310	2,310	2,310	2,310	2,310	S1	Standard consumption – 0.210 Nm <sup>3</sup> /FB
				2,310	2,310	4,620	4,620	4,620	4,620	4,620	S2	
Hydrochloric alcohol	L	192	132	176 (2025: 143)	176	176	176	176	176	176	S1	Standard consumption – 0.016 L/FB
				176	176	352	352	352	352	352	S2	
Degreaser FOAM – 0	kg	480	390	440 (2025: 390)	440	440	440	440	440	440	S1	Standard consumption – 0.035 kg/FB
				440	440	880	880	880	880	880	S2	
Detergent Compound	L	60	25	55 (2025: 45)	55	55	55	55	55	55	S1	Standard consumption – 0.005 kg/FB
				55	55	110	110	110	110	110	S2	
Emulsion liquid B – Cool 655	L	756	208	693 (2025: 208)	693	693	693	693	693	693	S1	Standard consumption – 0.063 kg/FB
				693	693	1386	1386	1386	1386	1386	S2	



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Raw materials and direct materials consumption											
Name	MU	Estimated quantity based on standard consumption	Quantity consumed in 2023	2025	2030	2035	2040	2045	2050	S1 – 11000 FB S2 – 22000 FB	Standard consumption/FB Standard consumption of raw materials is the maximum quantity of raw materials used in the manufacture of one FB in accordance with the technological process used and under normal technical – organisational conditions of production. Provided that no changes in the technological processes with an impact on the standard consumptions are expected, these limits cannot be modified.
Zirconium oxide	kg	276	22.77	253 (2025: 22.7)	253	253	253	253	253	S1	Standard consumption – 0.01 kg/FB
				253	253	506	506	506	506	S2	
Hydrogen gas 6.0 purity min 99.9999%	Nm <sup>3</sup>	39.6	9.1	18.2 (2025: 46.67)	18.2	18.2	18.2	18.2	18.2	S1	Standard consumption – 0.0496 Nm <sup>3</sup> /FB
				18.2	18.2	36.1	36.1	36.1	36.1	S2	
Helium gas 6.0, 99.9999% purity	Nm <sup>3</sup>	100.8	27.3	36.4 (2025: 46.5)	36.4	36.4	36.4	36.4	36.4	S1	Standard consumption – 0.0084 Nm <sup>3</sup> /FB
				72.8	72.8	72.8	72.8	72.8	72.8	S2	
Argon 5.3 min 99.9993% purity	Nm <sup>3</sup>	1,476	889.8	1,000 (2025: 1,160.4)	1,000	1,000	1,000	1,000	1,000	S1	Standard consumption – 0.123 Nm <sup>3</sup> /FB
				1,000	1,000	2,000	2,000	2,000	2,000	S2	
Nitrogen gas 4.6, 99.996% purity	Nm <sup>3</sup>	74.4	9.6	28.2 (2025: 29.6)	28.8	28.8	28	28	28.8	S1	Standard consumption – 0.0062 Nm <sup>3</sup> /FB
				28.8	28.8	28.8	28.8	28.8	28.8	S2	
Liquid nitrogen	L	981.6	923.19	899.8 (2025: 861.22)	899.8	899.8	899.8	899.8	899.8	S1	Standard consumption – 0.0818 L/FB
				899.8	899.8	1799.6	1799.6	1799.6	1799.6	S2	



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Raw materials and direct materials consumption											
Name	MU	Estimated quantity based on standard consumption	Quantity consumed in 2023	2025	2030	2035	2040	2045	2050	S1 – 11000 FB S2 – 22000 FB	Standard consumption/FB Standard consumption of raw materials is the maximum quantity of raw materials used in the manufacture of one FB in accordance with the technological process used and under normal technical – organisational conditions of production. Provided that no changes in the technological processes with an impact on the standard consumptions are expected, these limits cannot be modified.
Reducing the quantity of non-incinerable radioactive waste	t	20	12	11 (2025: 7.01)	10	10	10	10	10	S1	This amount was estimated taking into account a production of approximately 11,000 FBs
	t			11	10	16	16	16	16	S2	Starting in 2030, in the situation of doubling the production capacity, we estimate an increase in the quantity of non-incinerable radioactive solid waste by 30%, compared to the quantity generated in 2023.
Reducing the quantity of incinerable radioactive waste	t	6.7	2, 79	3 (2025: 3.5)	3	3	3	3	3	S1	This amount was estimated taking into account a production of approximately 11,000 FBs
	t			3	3	4	4	4	4	S2	Starting in 2030, in the situation of doubling the production capacity, we estimate an increase in the quantity of incinerable radioactive solid waste by 30%, compared to the quantity generated in 2023.
Reducing the quantity of non-hazardous non-radioactive waste	t	-	8.95	16 (2025: 38.89)	15	15	15	15	13	S1	This amount was estimated taking into account a production of approximately 11,000 FBs
	t			16	15	20.5	20.5	20.7	17	S2	N/A
Reducing the amount of non-radioactive hazardous waste	t	-	11.31	11 (2025: 8.76)	11	11	11	11	10	S1	This amount was estimated taking into account a production of approximately 11,000 FBs
	t			14.3	14.3	14.3	14.3	14.3	13	S2	N/A



In Pitesti NFP, an environmental analysis is carried out every year to assess both the inputs to the process, i.e. resources, raw materials, materials and utilities, and the outputs from the process, i.e. products, waste generated, etc. The environmental analysis addresses both the environmental risks and the related opportunities. The risk attached with inflows of resources, raw materials and materials in NFP is identified, assessed and documented in a risk data – sheet, where controls were determined.

Also about resources consumption, a financial performance risk was identified consisting of the exceeding of the specific rated consumptions, which would lead to both higher costs and an increased consumption of resources.

The quantities of raw materials and materials needed to produce one nuclear fuel bundle is determined in accordance with the procedures of Pitesti NFP. In order to optimise the production costs of the components and fuel bundles, Pitesti NFP has devised internal control tools and mechanisms to minimise the risk that the specific rated consumptions are exceeded.

### SNN Headquarters

The HQ does not generate any radioactive waste, and the recyclable waste generated is selectively collected and disposed of by a contracted third party, but the quantities are insignificant. Thus, no targets are currently set under the target circular economy principles or to mitigate the impact of waste generation.

### FPCU Feldioara

In order to meet the environmental targets and environmental indicators, an Environmental Management

Programme is devised to set actions and implementation time – limits.

- Electricity consumption by reference to the quantity of UO<sub>2</sub> produced – Reduction by min. 0.01% of the electricity consumption in 2025 v 2024, by reference to the quantity of U/UO<sub>2</sub> produced (16.54 MWh/ton of U from UO<sub>2</sub> produced); the metric fell within the proposed target, with a of a reduction of 18.29%

	2024	2025
<b>Amount of electricity used, MWh</b>	5,515.36	5,078.85
<b>Amount U of UO<sub>2</sub>, tonnes</b>	277.53	307.10
<b>Quantity of electricity consumed/quantity of U of UO<sub>2</sub> produced</b>	19.87	16.54

- Rational use of resources – increase by at least 0.02% in the TCU processing yield compared to 2023; the metric fell within the proposed target, as a 0.88% increase was reported
- Water Use Efficiency – The amount of water used in 2024 was 93,140 cubic meters and in 2025 it was 79,870 cubic meters.

No targets have been set for the waste hierarchy at the level of the facility, but in 2024 the facility has set an indicator associated with the objective of minimising the amount of solid radioactive waste to a level of 0.5 t/month, which has not been exceeded.



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Circular economy metrics FPCU Feldioara	MU	Base year 2023*	Target for 2030	Target for 2035	Target for 2040	Target for 2045	Target by 2050
<b>Waste separation and recycling</b>	%	0	0	0	0	0	0
<b>Energy consumption</b>	MWh	5,226.68	6,120.00	6,070.00	6,020.00	5,970.00	5,920.00
<b>Water consumption</b>	cubic m	97,920	110,000	110,000	110,000	110,000	110,000
U/TCU	kg	257,577	515,000	515,000	515,000	515,000	515,000
Process nitric acid 98%	t	451.96	904	904	904	904	904
Ammonia water	t	132.42	265	265	265	265	265
Ammonia cp sol 25%	t	245.46	491	491	491	491	491
Hydrochloric acid sol. 32%	t	4.55	9	9	9	9	9
Sodium hydroxide	t	4.46	9	9	9	9	9
Sodium carbonate	t	27.06	54	54	54	54	54
Tributylphosphate	kg	1,200	2,400	2,400	2,400	2,400	2,400
Kerosene	l	2,977	2,950	2,950	2,950	2,950	2,950
Flocculant FA 500 Ti	kg	230	460	460	460	460	460
Liquid nitrogen	nmc	105.717	210	210	210	210	210
Clarcel	t	4.25	9	9	9	9	9
Sodium chloride CT	t	38.02	76	76	76	76	76
Resin (mc) TC+Demi water	t	3.00	6	6	6	6	6
Sulfuric acid	t	0.05	0.1	0.1	0.1	0.1	0.1
Sodium hypochlorite	t	0.10	0.20	0.20	0.20	0.20	0.20
Sodium bisulphite sol. 24%	t	0.05	0.1	0.1	0.1	0.1	0.1
Flocculant FLR 4525	t	0.13	0.25	0.25	0.25	0.25	0.25
Anti – scalant agent. ROSCAL 04	t	0.05	0.1	0.1	0.1	0.1	0.1
<b>Waste reduction (radioactive and non-radioactive)</b>	t	3.32	5.5	5.5	2	2	2

\*The increase in the amount of radioactive and non-radioactive waste is expected because waste will result from the decommissioning of existing facilities with the implementation of the investment objectives.

FPCU Feldioara SRL has implemented a Quality Management System in the nuclear field. Products and equipment that meet the minimum acceptance criteria on environmental elements have been implemented in the technological process.

Due to the type of uranium ore preparation and processing plant/technical-grade uranium concentrates, all process inputs: raw materials (uranium ore, technical-grade uranium concentrates), materials, utilities that have entered the technological process become radioactively contaminated materials and are managed according to CNCAN legislation.

At unit level, an environmental analysis is carried out every year to assess both the inputs to the process, i.e. resources, raw materials, materials and utilities, and the outputs from the process, i.e. products, waste generated, etc.

All waste generated as a result of the activities carried out on the site of the unit are categorised as low – radioactivity solid waste and are disposed of by depositing them in the final disposal landfill existing on the site of the unit.

Liquid wastes go through a treatment process consisting of three treatment plants (M2, M3, M4) in order to bring industrial wastewater within the maximum limits allowed by environmental and water legislation.

The evolution of the performance indicators is analysed on a monthly basis, so that, should there be found that there is a risk that these are not attained, corrective/preventive actions can be taken.



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The identified risks are documented in risk records, where controls are also defined. These are reviewed and updated on a quarterly basis.

### EnergONuclear

EnergONuclear's target is to sort and recycle all waste by 2030.

The increase in energy consumption is due to the development of the project and its entry into the next phases (LNTP/FNTP), which have a high complexity and which imply both an increase in the number of staff and the space needed for the activity (increase in electricity and heating energy consumption). Regarding the targets for the years 2040 – 2050, EnergONuclear S.A. is a project company, an SPV whose objective is the completion and commissioning of Units 3 and 4 of Cernavoda NPP, which should be achieved by 2040.

There is a designated person responsible for the management of waste resulting from the activity of the EN Headquarters. It provides the interface with the building owner, who is responsible for taking over this waste. The responsibilities for the waste generated as a result of the conservation activities of Units 3 and 4 of Cernavoda NPP are taken over by the contractors according to the contracts with the entity.

Circular economy metrics EnergONuclear	MU	Base year 2023*	Target for 2030	Target for 2035
<b>Waste separation and recycling</b>	%	100%	100%	100%
<b>Energy consumption</b>	MWh	261.32	588	675
<b>Water consumption</b>	cubic m	1,075	2,419	2,777
<b>Waste reduction (radioactive and non-radioactive)</b>	t	48	108	124

EnergONuclear does not currently have a resource input policy in place and therefore significant impacts, risks and opportunities related to resource utilisation and circular economy are not addressed at entity level. There is a designated person responsible for the management of the waste resulting from the activity of the EnergONuclear Headquarters. It provides the interface with the building owner, who is responsible for taking over this waste.

The responsibilities for the waste generated on the site of Units 3 and 4 of Cernavoda NPP are taken over by the contractors according to the contracts with EnergONuclear. Related issues are also addressed in the PMG – 03 procedure.

### NuclearelectricaServ

Since Nuclearelectrica Serv SRL carries out activities on the site of Cernavoda NPP, the waste generated from the services it provides are collected and managed by Cernavoda NPP. Therefore, Nuclearelectrica SERV SRL does not have specific targets set but contributes to the achievement of the targets set by Cernavoda NPP. The two

entities have entered into Environmental Agreements in which the impacts and risks resulting from the provision of services are identified and by which they are bound to comply with all the legal requirements and Cernavoda NPP's procedures regarding the use of resources and waste management.

## SNN Group Resource use and circular economy



### Resources inflows | ESRS E5-4



**Pitesti NFP** is the only producer of CANDU-6 nuclear fuel bundles for Cernavoda NPP, where these are turned into electricity.

Cernavoda NPP uses nuclear fuel bundles as raw material for electricity generation. The amount of fuel bundles is provided under the project at approximately 5,000 fuel bundles per unit per year, and remains constant. How



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intensive these bunders are used depends on a physical and chemical calculation, and the amount varies slightly according to a number of factors.

### The number of fuel bundles used to obtain electricity

2024	NO OF NUCLEAR FUEL BUNDLES USED	
	UNIT 1	UNIT 2
	4,832	5,380
2025	NO OF NUCLEAR FUEL BUNDLES USED	
	UNIT 1	UNIT 2
	5,464	4,848

The quantities of raw materials and materials reflect the quantity in initial state of the materials, which are weighed in the reception activities, according to the internal procedures of Pitesti NFP.

The estimated quantities of raw materials and materials required in the technological process to obtain a production of 12,000 FBs/year (full production capacity) are shown in the table below:















Item no.	Raw materials	MU	Quantity (*)	Packaging
1	Uranium in the form of UO <sub>2</sub> sinterable powder	t U	250	Barrel 200 L
2	Zinc stearate	kg	780	Paper bag
3	Zircaloy – 4 1.6 mm sheet	kg	2376	Wood, cardboard
4	Zircaloy – 4 0.83 mm sheet	kg	540	Wood, cardboard
5	Zircaloy – 4 1.98 mm sheet	kg	276	Wood, cardboard
6	Zircaloy – 4 wire for skids	kg	576	Wood, cardboard
7	Zircaloy – 4 bars for plugs	kg	7,320	Wood, cardboard
8	Zircaloy – 4 tubes for sheaths	pcs.	462,000	Wood, cardboard, tinfoil
9	Beryllium (in powder form)	kg	7.8	Plastic barrel
10	Helium 4.6, 99.996% purity	Nm <sup>3</sup>	7200	Pressure vessel
11	Colloidal graphite solution	kg	900	Metal – sheet can

Pitesti NFP decided to pack the nuclear fuel bundles in reusable packages, made of wood (crates). Inside them, product protected with plastic, metal and cardboard materials, which are returnable materials and which Pitesti NFP reuses if they are not damaged. After decay, these become packaging waste.

The activities of SNN Group entities do not include biological materials, secondary raw materials or intermediate by – products.



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## SNN Group Resource use and circular economy



### Resources outflows | ESRS E5-5



Cernavoda NPP classifies each type of waste generated from its own activity according to the legal provisions in force. Radioactive and non-radioactive waste results from the activities performed by Cernavoda NPP. SNN pays special attention to the post-activity radioactive waste management, and all related activities are authorised in advanced by CNCAN.

#### Radioactive waste

Radioactive waste generated in the daily maintenance and repair activities and the planned or unplanned shutdowns of the plant, consists of:

- solid waste (plastics, cellulose, glass, wood, purification filters, ventilation system filters, etc.);
- organic liquid waste (oil, solvent, scintillating liquid);
- organic solid – liquid mixture waste (flammable);

- aqueous solid – liquid mixture waste (slurry);
- solid and liquid chemical waste.

2024	Quantity [m <sup>3</sup> ]	Limit under the license
<b>Solid radioactive waste [m<sup>3</sup>]</b>	55.97	No limits are imposed under the plant's permits and licenses
<b>Radioactive organic solid – liquid mixed waste [m<sup>3</sup>]</b>	4.18	No limits are imposed under the plant's permits and licenses
<b>Radioactive organic liquid waste [m<sup>3</sup>]</b>	1.76	No limits are imposed under the plant's permits and licenses
2025	Quantity [m <sup>3</sup> ]	Limit under the license
<b>Solid radioactive waste [m<sup>3</sup>]</b>	65.75	No limits are imposed under the plant's permits and licenses
<b>Radioactive organic solid – liquid mixed waste [m<sup>3</sup>]</b>	1.1	No limits are imposed under the plant's permits and licenses
<b>Radioactive organic liquid waste [m<sup>3</sup>]</b>	4.18	No limits are imposed under the plant's permits and licenses

Radioactive waste is collected and sorted by qualified staff, according to rules and criteria laid down under procedures, and apply to all types of radioactive waste.

For each type of radioactive waste, different criteria are applied:

- source of origin (services building, reactor building);
- type of material (plastic, cellulose, metal, wood, oil, solvents, etc.);

- radionuclide content (with short, medium or long lifetime);
- contact dose flow – rate (weakly – active, medium – active).

After sorting, radioactive waste is stored in special stainless – steel containers.

Organic liquid radioactive waste and organic solid – liquid mixtures (flammable) are kept in the services building, and are to be then solidified to remove any potential flammability hazards.

The waste radioactive aqueous solid – liquid mixtures (sludge) are stored in stainless – steel barrels in the services building, and are to be then subjected to drying – treatment applying processes to remove the water content.

Solid chemical and radioactive liquid waste are kept in the services building, in containers suitable for their chemical properties, and will be treated by authorised operators.

The volumes of waste produced can be reduced by compaction (using a hydraulic press), applying treatment methods that use incineration of the combustible radioactive solid waste and melting of radioactive metal waste, at external authorised operators, and by unconditional release of waste under the authorisation regime of CNCAN.

Solid or solidified radioactive waste is stored over the entire plant's operation period, under optimal safety and



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storage conditions. This is stored inside the physical protection fence of the site, in the Radioactive Solid Waste Intermediate Storage.

The final storage of this waste is only done after conditioning into solid safe matrices, which guarantee that no negative impact on the environment occurs for at least 300 years.

### Management of spent fuel

Spent fuel is stored as follows:

- Wet storage in the unit's Spent Fuel Pool, for a period of at least 6 years
- Dry storage in the Spent Fuel Intermediate Storage, for a period of at least 50 years.

The Intermediary Spent Fuel Storage Facility (DICA) is located on the site of Cernavoda NPP, and is carried on an in – premises road that allows maintenance of an integrated physical protection system.

Storage is staged – out in accordance with the DICA long – term development strategy. So far, as many as 16 MACSTOR 200 modules have been made.

### Waste resulting from plant decommissioning

In Cernavoda NPP, no waste is generated further to the decommissioning of the plant or a part of the plant, because Units 1 and 2 of are in their service lifetime set out under designs, and for which extensions of their respective service lifetimes by additional 30 years are envisaged (estimate – Unit 1 by 2059, and Unit 2 by 2067). So far, no projections as to the quantities of waste

expected to result from the decommissioning activities have been made.

### Non-radioactive waste

According to the Environmental Permit, Cernavoda NPP does not carry out any treatment, recovery, recycling and disposal of the generated non-radioactive waste.

Non-radioactive waste is collected separately at the place of generation and is stored in containers identified by the type of waste, in spaces specially arranged and approved under the plant's documents. Cleaning routines and standards are issued for retrieval of waste from the collection spaces, fitting – out these spaces, labelling, recording and transferring it to the temporary disposal areas.

Recoverable waste (ferrous and non-ferrous metal, plastic, PET, paper, batteries, etc.) is handed over under contract to authorised companies, according to specific legal requirements.

Hazardous waste is collected separately, correctly labelled and transferred from the place of generation to temporary storages (where applicable).

Non-radioactive industrial waste is disposed /recovered in accordance with the plant's procedures and the specific legal regulations in force concerning the waste amount recording, nature, origin and, where applicable, destination, frequency, mode of transport, treatment method and disposal/recovery, for appropriate reporting to the environmental authorities.

Municipal and similar waste is collected and transferred under a services contract to landfills.

Cernavoda NPP keeps monthly records of the amount of waste generated, temporarily stored, handed over for recycling/recovered/disposed of.

The waste record keeping methodology is described in the governing procedures of these activities, namely : for non-radioactive waste – SI – 01365 – A033 where the whole process is described in line with the requirements of the Environmental Permit, the Environmental Law, the Ordinance on the waste regime and the specific subsequent legislation. For simplicity, the procedure also includes an illustrative flowchart. For radioactive waste, the methodology is described in the procedure code SI – 01365 – RP007, where the detailed activities are presented in the chapters defined in the process flow diagram.



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Amounts of non-radioactive waste	Quantity [tonnes] 2024	Quantity [tonnes] 2025	Limit under the license
<b>Non-recyclable/non-recycled non-radioactive waste [tonnes] (acids without other specification; oily water from oil/water settlers; inorganic waste with a content of substances of concern; absorbents; filtering materials; polishing materials with a content of substances of concern).</b>	56.45	158.28	No limits are imposed under the license
<b>Non-radioactive waste of concern [tonnes]</b>	71.64	143.02	No limits are imposed under the license
<b>Recycled non-radioactive waste [tonnes] (batteries; used tires; soil and stones; calcium hydroxide)</b>	144.61	424.42	No limits are imposed under the license
<b>Selectively collected non-radioactive waste [tonnes] (plastic, PET, paper, metal packages, glass)</b>	21.53	8.05	No limits are imposed under the license
<b>Percentage of non-recycled waste (%)</b>	44%	28.14%	-
<b>Percentage of recycled waste (%)</b>	56%	71.86%	-

Total non-radioactive hazardous waste 71.64 tonnes (2024) and 143.02 tonnes (2025).

### Pitesti NFP

Pitesti NFP is a producer of CANDU-6 type nuclear fuel bundles, so in the case of Pitesti NFP, placement on the market mainly involves the end product. Regarding packaging, Pitesti NFP decided to pack the nuclear fuel bundles in reusable packages, made of wood (crates). Inside them, product protected with plastic, metal and cardboard materials, which are returnable materials and which NFP reuses if they are not damaged. After decay, these become packaging waste.

In the manufacturing, maintenance, technical quality control, supply and transport, radiation protection, environmental protection, emergencies, etc. processes, a wide range of materials is used, and the activities carried

out result into the three categories of waste:

- incinerable/non-incinerable radioactive waste;
- non-radioactive waste (of, and not of, concern);

### Radioactive waste

The radioactive waste resulting from activities carried out in controlled areas of NFP is classified as follows:

- Radioactive wastewater (slightly contaminated with uranium);
- Gaseous Radioactive Effluents (GREs);
- Solid Radioactive Waste (SRW) resulting from the technological, control and maintenance processes, radiological protection, repair works, investments, asset retirements, etc.
- Solid radioactive waste resulting from the

conditioning of radioactive organic liquid wastes (spent organic solvent, oils) with NOCHAR polymers;

- Recoverable radioactive liquid waste (DLR) in the SCRAP category.

The radioactive waste contaminated with natural uranium, generated in NFP, are:

- **Non-incinerable radioactive solid waste with low specific activity (NIRSW)** – metal waste, pipes, grinding stones, metal parts, subsets, epoxy powder, bricks, cables, debris, etc. – contaminated with natural uranium) that cannot be decontaminated and are of no interest for recovery. This is temporarily stored on the Solid Radioactive Waste Temporary Storage Platform (TSP) in metal barrels. The waste is then transferred/transported to the Low Activity Solid Waste Final Disposal Landfill of Feldioara, for final storage.
- **Incinerable radioactive solid waste low specific activity (DSRI)** – filters/prefilters resulting from ventilation systems, protective equipment, paper, etc. contaminated with natural uranium. This is temporarily stored on the for Solid Radioactive Waste Temporary Storage Platform (TSP) in metal barrels and/or raffia bags and later are transferred to STDR – ICN for disposal by incineration and recovery of uranium contained in uranium ash, that is returned of nuclear control safeguards.
- **Radioactive liquid waste** with different concentrations of uranium from the production and quality control activity are collected in stainless steel tanks in the Liquid Radioactive Waste Collection Station of NFP (SCDLR – NFP), and are transferred to



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the Radioactive Waste Treatment Station of ICN (STDR – ICN) for the recovery of uranium, from where, through treatment, solid and dry uranyl phosphate is obtained, which is returned to NFP under the nuclear safeguards control.

Management of the waste generated by Pitesti NFP is a procedure – regulated activity, as follows:

- incinerable/non-incinerable radioactive waste is managed in accordance with the requirements of the procedure *Sorted collection, packaging, temporary storage and record keeping of non-incinerable/non-incinerable radioactive solid waste*
- uncontaminated waste is managed in accordance with the requirements of the procedure *Management of uncontaminated radioactive waste* procedure
- waste contaminated with beryllium is managed in accordance with the procedure *Management of uncontaminated waste procedure.*
- municipal/household waste is managed in accordance with the requirements of the procedure *Municipal waste collection and transfer.*

Pitesti NFP issues decisions to appoint waste management officers, by type of waste.

The waste generated from its operation is collected separately, by waste category that are dosimetrically measured to determine whether they are contaminated; then, it is transferred for temporary storage in specially arranged places, and is handed over to authorised operators by waste category, under services contracts.

Hazardous and non-hazardous waste is collected in specially designated areas. In order to avoid the accumulation of large quantities of waste, the NFP notifies the service providers to take them back at regular intervals. Before being taken over, the waste is weighed and the documents required by the applicable legislation in the field of environmental protection are drafted, namely Annex 2 and 3 of HG 1061/2008. For certain types of wastes, e.g. waste substances, hazardous mixtures, used oils, the sorting is carried out before temporary storage on the platform. The management of non-radioactively contaminated waste is described in procedure CN – AD – 54.

The quantities of waste generated in 2025 are presented in the Environmental Monitoring Report.

Radioactive waste	Quantity 2024	Quantity 2025	Authorised limit
<b>Total amount of non-incinerable radioactive solid waste (NIRSW) generated</b>	7,726.2 kg	7,009.7 kg	20,000 kg/year
<b>The total amount of non-incinerable radioactive solid waste (NIRSW) transferred to the Low – Activity Radioactive Solid Waste Final Landfill</b>	0	14,672 kg	-
<b>Inventory of non-incinerable radioactive solid waste as at 31 December 2025</b>	8,545.7 kg	953.2 kg	-
<b>Total amount of incinerable radioactive solid waste (DSRI) generated</b>	3,133.6 kg	3,497.9 kg	6,700 kg/year
<b>Total amount of incinerable radioactive solid waste (DSRI) transferred to the STDR of Pitesti ICN for incineration</b>	4,798.7 kg	2,592.3 kg	-
<b>Stock of incinerable solid radioactive waste as at 31 December 2025</b>	183.2 kg	1,088.8 kg	-
<b>Liquid Radioactive Waste (DLR) transferred to STDR – ICN</b>	230 m <sup>3</sup>	250 m <sup>3</sup>	800 m <sup>3</sup>

Non-radioactive waste recovery/recycling	Amount generated in 2024 [tonnes]	Amount generated in 2025 [tonnes]
<b>Non-recyclable non-radioactive waste [tonnes] (paper/cardboard, wood, plastic, metal, etc.).</b>	17.75	19.73
<b>Non-radioactive waste of concern [tonnes] (used oils, emulsion, chemicals, mineral fat, etc.)</b>	6.87	8.76

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### SNN Headquarters

For the SNN HQ, there are no significant material outflows, other than waste (e.g., domestic waster or recyclable waste: paper/cardboard, plastics, metals), and the produced energy. The activity of the Headquarters is rendered in a leased building, and the household and recyclable waste generated is now collected and disposed by the company under contract which Plaza Development, namely Romprest; the costs are then recharged to SNN according to the lease agreement, depending on the leased area. For the buildings owned at str. Polona/Slavesti, SNN has a selective collection contract with Romprest, but as there is no business pursued in the building, this is insignificant.

Waste generated, recycled and disposed of.	2024 quantity [tonnes]	2025 quantity [tonnes]	Limit under the license
Non-recyclable/non-recycled non-radioactive waste [tonnes] (mixed domestic waste).	51.01	35.60	No limits are imposed under the license
Percentage of non-recyclable/non-recycled non-radioactive waste (%)	86%	64%	-
Selectively collected non-radioactive waste [tonnes] (plastic, PET, paper, glass)	8.45	15.41	No limits are imposed under the license
Selectively collected non-radioactive waste (%)	14%	36%	-

### FPCU Feldioara

FPCU Feldioara S.R.L. classifies each type of waste generated from its own activity according to the legal provisions in force. Radioactive and non-radioactive waste results from the activities performed.

Non-radioactive wastes is waste that resulted from the various assets that were acquired from CNU SA Bucharest and were part of related activities (mechanical workshop, steam trails, cars, etc.) rather than the main activity of processing uranium ore. This scrap metal was recycled in 2025 through a recycling action on the industrial platform. FPCU Feldioara pays special attention to the post – activity

radioactive waste management, and all related activities are authorised in advanced by CNCAN.

#### Radioactive waste

Radioactive waste generated in the daily maintenance and repair activities and the planned or unplanned shutdowns of the unit, consists of:

- solid waste (plastics, cellulose, glass, wood, ventilation system filters, etc.);
- aqueous solid – liquid mixture waste (slurry);

Radioactive waste is collected and sorted by qualified staff,

according to rules and criteria laid down under procedures, and apply to all types of radioactive waste. For each type of radioactive waste, different criteria are applied:

- source of origin;
- type of material;
- contact dose flow – rate.

Generated radioactive waste	2024 quantity	2025 quantity	Limit under the license
Total radioactive solid waste [tonnes]	1.8	1.5	6
Aqueous solid – liquid mixture waste [m <sup>3</sup> ]	100,000	79,870	No limits are imposed under the plant's permits and licenses

After sorting, the radioactive waste is stored in metal containers and deposited in the final disposal repository for low – radioactivity solid waste on the industrial platform.

The solid radioactive waste – aqueous liquids resulting from the technological process of processing technical-grade uranium concentrates are directed through the evacuation system (metal pipes) to the Mittelzop settling pond from where they are taken to the metal recovery plant respectively the final treatment plant module M4.



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In the year 2024, 93,140 cubic meters were abstracted and fully treated, of which 34,620 cubic meters were discharged into the emissary in compliance with the maximum permissible limits. In the year 2025, 79,870 cubic meters were abstracted and fully treated, of which 85,400 cubic meters were discharged into the emissary in compliance with the maximum permissible limits.

The difference between the above mentioned volumes was recirculated in the technological process.

### Non-radioactive waste

According to the specifics of the unit, the processing of technical-grade uranium concentrates does not result in non-radioactive waste.

After taking over the assets that belonged to CNU SA Bucharest metallic waste was identified that did not enter the technological flow of uranium ore processing, which, following the measurements to identify possible contamination, was found free from radiological contamination.

Generated non-radioactive waste	2024 quantity [tonnes]	2025 quantity [tonnes]	Limit under the license
Non-recyclable non-radioactive waste [tonnes] (metal waste).	1,025.36	1,121.56	No limits are imposed under the license

### EnergoNuclear

EN is a project company, and its main activity is the provision / procurement of intellectual services / technical consultancy at this stage of the Project development. Thus, the EN activity does not include the output of resources (production process, product sustainability/durability, products that can be repaired).

EnergoNuclear S.A. has a designated waste manager, and the waste resulting from the activities are taken by an authorised company, designated by the owner of the rented space, which transports them to the landfill.

Generated waste	2024 quantity [tonnes]	2025 quantity [tonnes]	Limit under the license
Non-recyclable/non-recycled non-radioactive waste [tonnes] (mixed domestic waste).	22.33	40.26	No limits are imposed under the license
Percentage of non-recyclable/non-recycled non-radioactive waste (%)	100%	100%	

### NuclearelectricaServ

Since Nuclearelectrica Serv SRL carries out activities on the site of Cernavoda NPP, the waste generated from the services it provides are collected, managed and reported by Cernavoda NPP, according to the waste management files HG 856/2002.

## SNN Group Resource use and circular economy



### Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities | ESRS E5-6



No detailed quantification of the anticipated financial effects has been conducted in monetary terms, before considering the actions related to resource use and circular economy. As part of the materiality assessment, the risks and opportunities identified were assessed to be of low materiality, between 8% and 12%, with a low likelihood of occurrence and without giving rise to any material financial effect for the SNN Group.



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## SNN Group Own workforce



**Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3; IRO-1**



The following categories of persons are included in the scope of the data and information presented in this chapter, according to their materiality. Such materiality is different across the topics and sub-topics under review, which is why the specific categories will be indicated in each section/subsection of the chapter.

**SNN's own employees** (with employment agreement) that can be located in the HQ and branch sites: Cernavoda Nuclear Power Plant Branch and Pitesti Nuclear Fuel Plant.

**Subsidiaries' own employees** (with employment agreement) that can be located in the sites of Feldioara, for the subsidiary "Fabrica de Prelucrare a Concentratorului de Uraniu", and Cernavoda for the subsidiary NuclearelectricaServ and EnergoNuclear.

The important issues related to the respect for human rights are carefully reviewed; thus, under the human resources policies, the Collective Bargaining Agreement (CBA) and the SNN's Administration Plan, these are adapted to the particulars of the nuclear industry, thus contributing to the corporate culture and climate, according to the goal that nuclear safety is the most important.

The Risk Management Service (RMS) of the SNN Headquarters regularly assesses the SNN Group risks regularly. Each department appoints a person in charge of the departmental risks, and in branches/subunits, this role is provided by a representative coordinated from the Headquarters, and a person in charge for each department. The risk management system is compatible

with the standard ISO 31000. RMS submits and publishes a report on the management system analysis, which also covers risk registers. The risk management system and the Company's risks are reviewed quarterly by the Management Control System Committee (SCIM), chaired by the SNN's CEO.

The management plan of SNN for years 2023 – 2026 contains, among the Company's strategic objectives, actions concerning Occupational Health and Safety as part of the Corporate Social Responsibility and the main action lines concerning human capital management.

A detailed description of the process followed to identify and assess the material impacts, risks and opportunities is presented in the section "Material Impacts, Risks and Opportunities, and their Interaction with the Business Strategy and Model" of this Report.

The own workforce-related impacts, risks and opportunities are identified, as these will be shown in the tables below, have been identified and assessed as part of the 2025 double materiality assessment, in an internal workshop, as well as by consulting other stakeholders and literature sources and risk registers, and will be dealt with in the following sections.



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Topic	Sub-topic	Sub-sub-topic	Impacts
Own employees	Working conditions	Secure employment	<b>Current, positive impact:</b> Accessibility of social protection for employees. <i>Applicable at Group level</i>
Own employees	Working conditions		<b>Current, positive impact:</b> Use of employees under fixed-term agreements. <i>Applicable for: Cernavoda NPP, Pitesti NFP, SNN Headquarters and SNN subsidiaries: FPCU Feldioara &amp; NucleaelectricaServ</i>
Own employees	Working conditions	Working time	<b>Current, positive impact:</b> Working with employees under part-time agreements. <i>Applicable for: Cernavoda NPP, Pitesti NFP, SNN Headquarters, EnergoNuclear &amp; NucleaelectricaServ</i>
Own employees	Working conditions	Adequate wages	<b>Current, positive impact:</b> Providing adequate remuneration for own employees to ensure a decent standard of living. <i>Applicable at Group level</i>
Own employees	Working conditions	Social dialogue	<b>Current, positive impact:</b> Employees representation through trade unions/works councils in the workplace and across borders. <i>Applicable at Group level</i>
Own employees	Working conditions	Freedom of association, the existence of works councils and the information, consultation and participation rights of workers	<b>Current, positive impact:</b> Respect for the employees' freedom to join a trade union/works council, as well as for their rights to information, consultation and participation. <i>Applicable at Group level</i>
Own employees	Working conditions	Collective bargaining, including rate of workers covered by collective agreements	<b>Current, positive impact:</b> Ensuring a stable climate, quality of work, overcoming emerging challenges and increasing employee satisfaction through the Collective Bargaining Agreement. <i>Applicable at Group level</i>
Own employees	Working conditions	Work-life balance	<b>Current, positive impact:</b> Providing employees with a work – life balance and offering a stable and secure job. <i>Applicable at Group level</i>



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Topic	Sub-topic	Sub-sub-topic	Impacts
Own employees	Working conditions	<b>Health and safety</b>	<b>Potential, negative impact:</b> The impact of nuclear incidents on employees health, affecting the reputation of SNN and some legal requirements. <i>Applicable for: Cernavoda NPP, Pitesti NFP and SNN subsidiaries: FPCU Feldioara &amp; NucleaelectricaServ</i>
Own employees	Working conditions		<b>Current, positive impact:</b> Improving working conditions and increasing employee satisfaction and well – being at work. <i>Applicable at Group level</i>
Own employees	Working conditions		<b>Current, negative impact:</b> Impact of accidents at work on the employee health. <i>Applicable at Group level</i>
Own employees	Equal opportunities and treatment for all	<b>Gender equality and equal pay for work of equal value</b>	<b>Current, positive impact:</b> Ability to provide a gender inequality free workplace environment for its employees. <i>Applicable at Group level</i>
Own employees	Equal opportunities and treatment for all	<b>Training and skills development</b>	<b>Current, positive impact:</b> Employee access to quality sources of education and career development. <i>Applicable at Group level</i>
Own employees	Equal opportunities and treatment for all		<b>Current, positive impact:</b> Digitalisation of certain processes. <i>Applicable at Group level</i>
Own employees	Equal opportunities and treatment for all	<b>Employment and inclusion of persons with disabilities</b>	<b>Current, positive impact:</b> Inclusion of people with disabilities in the own workforce. <i>Applicable at Group level</i>
Own employees	Equal opportunities and treatment for all	<b>Measures against violence and harassment in the workplace</b>	<b>Potential, negative impact:</b> Impact of workplace violence and harassment incidents. <i>Applicable at Group level</i>
Own employees	Equal opportunities and treatment for all	<b>Diversity</b>	<b>Potential, negative impact:</b> Impact of incidents of discrimination on the grounds of gender, racial origin, sexual orientation, age, ethnic origin, religion political beliefs, etc. <i>Applicable at Group level</i>
Own employees	Other work-related rights	<b>Privacy</b>	<b>Current, positive impact:</b> Data protection and privacy for own employees. <i>Applicable at Group level</i>
Own employees	Other work-related rights	<b>Adequate housing</b>	<b>Current, positive impact:</b> Access of own employees to affordable and adequate housing. <i>Applicable to Cernavoda NPP.</i>















The risks and opportunities identified and assessed as material in the materiality assessment carried out in 2025 can be consulted in the table below:

Topic	Sub-topic	Sub-sub-topic	Risk/Opportunity
Own employees	Working conditions	Secure employment	<b>Opportunity:</b> Maintenance and development of safe jobs for the own employees. <i>Applicable at Group level.</i>
Own employees	Working conditions	Secure employment	<b>Risk:</b> Rushed conclusion of fixed-term agreements. <i>Applicable for: Cernavoda NPP, Pitesti NFP, SNN Headquarters, FPCU Feldioara &amp; NucleaelectricaServ.</i>
Own employees	Working conditions	Adequate wages	<b>Risk:</b> Legislative amendments impacting payrolls. <i>Applicable at Group level.</i>
Own employees	Working conditions	Collective bargaining, including rate of workers covered by collective agreements	<b>Opportunity:</b> Continuous improvement of the work quality and the provisions of the Collective Bargaining Agreement. <i>Applicable at Group level.</i>
Own employees	Working conditions	Work-life balance	<b>Opportunity:</b> providing a system of benefits, vacation, holidays, days off and remote working options for employees can increase overall employee satisfaction, as well as satisfaction with working time and can increase retention. <i>Applicable at Group level.</i>
Own employees	Working conditions	Health and safety	<b>Opportunity:</b> Maintaining adequate emergency training to all its staff and keeping in place a sound safety culture. <i>Applicable to Cernavoda NPP, Pitesti NFP, FPCU Feldioara &amp; NucleaelectricaServ</i>
Own employees	Other work-related rights	Adequate housing	<b>Opportunity:</b> Supporting employees coming from remote areas (65 km). <i>Applicable to Cernavoda NPP</i>

In 2025, the impacts, risks and opportunities related to consumers and end-users were reassessed against those identified in 2024. The impacts, risks and opportunities identified in the previous year were rewarded and specifically reclassified at an individual sub-sub-topic level for each matter. The impacts, risks and opportunities previously identified have been reworded where necessary for clarity, but there were also impacts, risks or opportunities newly identified on certain aspects. The analysis and reassessment identified relevant and material impacts for all the sub-sub-topics, as shown in the table above. Unlike last year, the impacts on own employees, as well as the risks and/or opportunities related to “Child labour” and “Forced labour” have been assessed as not applicable.



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## SNN Group Own workforce



### Processes to work together with the own workforce and workers' representatives on impacts | S1-2



The policies, procedures or processes presented in the previous chapter address and target the impacts, risks and opportunities related to the SNN Group's own workforce. All the workers belonging to companies of the SNN Group have access to own human resources policies, an own Collective Bargaining Agreement, the Internal Regulation and the Nuclear Employee Code of Conduct, and the Code of Business Ethics and Conduct, which are available on the intranet of each company, and are distributed and/or formally acknowledged by all the employees or whenever these are amended/updated.

#### SNN (Headquarters and branches)

The processes related to the collaboration between employer and employees are regulated in SNN under the Collective Bargaining Agreement and in the Occupational

Health and Safety Management System implemented and certified in each SNN Group unit, according to SR ISO 45001:2018.

The CBA clauses are negotiated after on – going consultations of the Negotiation Committee appointed both by the management and by the representative trade union operating in the Company, in accordance with the provisions of Law no. 62/2011.

In accordance with the provisions of Law 367/2022, the Committee appointed to negotiate the CBA in SNN is composed of the employer, represented by the members of the directorship appointed by decision of the Board of Directors, and the representative trade union, i.e. members appointed by mandate by the president of the representative trade union. The meetings of the Negotiating Committee are held, as a rule, at the Company's registered office or any other place indicated in the notice of that meeting. As a rule, members participate in meetings in person and, by way exception, by means of remote communication that provide the technical conditions required for identification of the participants and allow their effective participation (such as video – conferencing, teleconferencing, etc.), usually during the working hours, unless the parties agree otherwise.

A **joint management – union committee** set up by decision of the SNN management has a number of powers and duties, as laid down in the CBA:

- to give a consistent interpretation of the CBA clauses;
- to review and address the employees' complaints about how the management of the SNN units settle

their applications, reports and complaints related to application of the CBA and of the labour relations legislation;

- at the request of employees, to try to settle amicably the potential situations that fall under the jurisdiction of the courts, before bringing up the matters concerned before them. The amicable settlement will be addressed as a matter of urgency, so as not to affect the statutory time – limit for bringing the matter before the court of jurisdiction. Amicable settlement of disputes prevents court proceedings;
- to follow up on the application of the CBA, the Internal Regulation, the Employee Code of Conduct in the nuclear field, the legal provisions and other agreements concerning labour relations;
- to report to the executive management of SNN and, as the case may be, to the Board of Directors any infringements of the legal provisions, the CBA and other agreements concerning labour relations;
- to carry out any other duties provided by the law and/or resulting from the own Functioning Regulations, as annex to the CBA;
- to draw up reports at the request of any of the parties regarding compliance with the CBA, the Internal Regulation, the Employee Code of Conduct in the nuclear field, the legal provisions and other the agreements concluded under the terms of the law, which they make known to the management of the Company, as well as to the management of the trade union.

As to the **occupational safety and health** matters, cooperation with the employees and their representatives



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takes place through the **Occupational Safety and Health Committee (OHSC)**, which operates according to its own Organisation and Functioning Regulation (OFR), which also sets out the powers and duties of this Committee. Employee representatives are appointed by the SNN representative union and include representatives of all workers in SNN. The Chief Executive Officer of SNN appoints by decision the members of the OHSC, as well as the chairman of this committee. OHSC meets at least once a quarter, and as often as necessary, and the Agenda of each OHSC meeting is defined by the chairman and the secretary of the Committee, in consultation with the workers' representatives, and is sent to the members of the Occupational Safety and Health Committee and the Territorial Labour Inspectorate at least 5 days before the date set for the Committee's meeting. Minutes are prepared for each meeting, which is signed by all the OHSC members and is then forwarded to the Territorial Labour Inspectorate in accordance with the law.

In 2025, the following issues were mainly debated in the OHSC:

- Approval of the 2024 Occupational Safety and Health Report at SNN level;
- Review of the improvement proposal no. PI25-0005 "Reimbursement of the purchase of ergonomic equipment for employees with lumbar/spinal conditions";
- Review of the improvement proposal no. PI25-0032 "Purchase of defibrillators";
- Status of personal protective equipment acquisition;
- Provision of protective equipment (e.g., winch tripods, gas analysers, etc.) for contractor staff;

- Acquisition of protective footwear and shirts for working in Ex areas;
- Provision of bottled mineral water during heatwaves;
- Safe performance of the activities under the services and works contracts, including controlling the contractors' access to the Cernavoda NPP site;
- Presentation of the revision status of the document SI-01365-P002 "Works Permitting System";
- Summary presentation of the results of the exchanges of experience with national energy companies;
- Analysis of the state of play of the OHSP 2025 after the first 6 months;
- Updating in agreement with the SNN Decision to terminate the 2025 Occupational Safety and Health Programme's Corporate Committee (OHSP) at SNN Group level;
- Modification of the ceilings set for additional medical tests required by the occupational physician to determine the fitness for work;
- Rescue from confined spaces on the Cernavoda NPP platform;
- Approval of the 2026 Occupational Safety and Health Programme (OHSP).

Moreover, the management staff of the Headquarters carry out observation and guidance activities in the subsidiaries, in accordance with the related procedure, and the results thereof are documented in an Observation Report for the occupational safety and health field. For 2025, four such actions were planned and completed, and their conclusions were documented in an Observation Report and were presented in the regular SNN

management review meetings.

In SNN, there is a procedure on the organisation and functioning of the **Ethics Committee**, as well as on the statute of the ethics advisors of the Company, which also covers assessment and mitigation of the impact on human rights:

- Management and development of the Company's ethical values, ensuring compliance with the ethical rules of business conduct, in all company structures and at all levels;
- Coordination and supervision of the development, interpretation and implementation of the ethics policies and programmes;
- Analysis of the situations disclosed in referrals/reports concerning infringement of the ethics standards, policies and procedures of the organisation and their referral to those having authority to address them;
- Advising employees on how to approach certain situations so that no ethics rules are infringed;
- Participation in the investigations carried out on infringement of the Company's code of conduct and the internal rules, and making recommendations for the lawful settlement of the case;
- Delivery of training on ethics and compliance with the rules of the organisation, as well as regular communications about ethics, compliance with the rules and business conduct requirements;
- Integration of the newly hired into the ethical environment, compliance with the rules and the business practices of the Company;
- Measurement and management of the Company's performance in terms of ethics and compliance;



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- Preparation of quarterly reports on compliance with the conduct rules by the unit's employees.

Any matter that affects human rights is reviewed and reported by the ethics advisors, and should any form of violation of the human rights be found, disciplinary procedures are initiated in accordance with the legal provisions and the Internal Regulation of SNN.

An onboarding programme is in place for new hires (induction), containing information about the human resources policies, the CBA, the Internal Regulations and their availability on the SNN Group's intranet.

Responsibility for the protection of human rights shall be reflected at the corporate level by an integrated approach, with responsible staff through various ways of action and decision – making capacity:

- Board of Directors
- CEO
- Branch Directors
- Human Resources Strategy Directorate
- ESG Working Group
- Distinct organisational entity for managing the Compliance Function
- Anticorruption policy, implemented and certified according to ISO 37001
- Whistleblower
- Ethics Committee/Ethics Adviser

In the SNN units, participation of employees or their representatives in discussions about their problems concerning human rights and occupational health and

safety, is ensured according to the legal regulations in force.

The Ethics Committee and the Ethics Advisor are responsible for raising such concerns. On a quarterly basis, the Ethics Advisor prepares reports on compliance with the conduct rules by the SNN employees. The reports, as validated by the Ethics Committee and approved by the Branch Manager or, as applicable, by the SNN CEO, are communicated to employees. Quarterly reports are required to:

- find the causes leading to professional misconducts, including coercion or threats exerted on an employee to cause them to infringe the legal provisions in force, or to apply them improperly;
- identify ways to prevent professional misconducts;
- take measures to reduce and eliminate the cases of noncompliance with legal provisions.

There is also an application for SNN staff to submit improvement proposals and an application to report abnormal conditions.

#### FPCU Feldioara

There are robust overall processes in place to engage with FPCU Feldioara employees and worker representatives to address actual and potential impacts on them.

These processes include:

- Training sessions to communicate the provisions of the Internal Rules (IR), Code of Ethics and other relevant regulations, including Occupational Safety and Health (OHS) provisions.

- Regular trade union meetings, where employees have the opportunity to discuss concerns and direct or potential impacts, seek clarification and contribute to decision-making.
- Meetings of OHS Committees, where detailed prevention and action measures to ensure a safe working environment are discussed.
- Negotiations for the Collective Bargaining Agreement (CBA), thus ensuring that employees' interests and rights are properly represented and protected.

CBA negotiation meetings are recorded in minutes of meetings, and the conclusions of the meetings of the OHS committees are recorded in protocols.

#### EnergoNuclear

Collaboration with employees and employee representatives on the actual and potential impacts thereon takes place in a well – structured framework. First of all, EnergoNuclear's external contractors working with the organisation sign the Occupational Safety and Health (OHS) convention, which is attached to the collaboration contracts. This step ensures that all parties involved are aware of the standards and procedures necessary to maintain a safe working environment. In addition, employees are regularly informed about actual and potential impacts through OHS training sessions. These trainings are essential to equip employees with the necessary knowledge to identify and manage risks in the workplace, thus helping to prevent accidents and protect their health. This process of ongoing collaboration between employees, worker representatives and contractors underscores the organisation's commitment to



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creating and maintaining a safe and healthy work environment.

Employees' perspectives play an essential role in the Company's decisions and activities, contributing to a harmonious and productive working environment. Collaboration takes place both directly with own workforce and through workers' representatives such as trade unions. These interactions take place at various stages, including in the negotiation of the collective bargaining agreement, its amendment by addenda, and at meetings intended to finalise the various protocols resulting from the application of the provisions of the collective bargaining agreement. The frequency of these collaborations is determined by need, with company management initiating meetings whenever necessary and being open to meeting with employee representatives at their request.

The operational responsibility for ensuring collaboration with employees lies directly with the senior management function of the organisation, which ensures that the results of these interactions underpin the approach and decisions taken. This process ensures that the organisation remains responsive to employee needs and proposals, promoting a cooperative and responsible working environment.

#### **NuclearelectricaServ**

All employees have access to the Collective Bargaining Agreement, the Internal Regulations and the Code of Ethics and Conduct, available at the Company's headquarters. The processes for employer – employees collaboration are regulated by the Collective Bargaining Agreement.

The CBA clauses are negotiated after on – going consultations of the Negotiation Committee appointed both by the management and by the representative trade union operating in the Company.

Meetings of the Negotiating Committee shall be held at the Company's headquarters, usually during working hours, unless otherwise agreed by the parties.

As to the **occupational safety and health** matters, cooperation with the employees and their representatives takes place through the **Occupational Safety and Health Committee (OHSC)**, which operates according to its own Organisation and Functioning Regulation (OFR), which also sets out the powers and duties of this Committee. The Chief Executive Officer designates by decision the members of the OHSC, as well as the chairman of this committee. OHSC meets at least once a quarter, and as often as necessary, and the Agenda of each OHSC meeting is defined by the chairman and the secretary of the Committee, in consultation with the workers' representatives, and is sent to the members of the Occupational Safety and Health Committee and the Territorial Labour Inspectorate at least 5 days before the date set for the Committee's meeting. Minutes are prepared for each meeting, which is signed by all the OHSC members and is then forwarded to the Territorial Labour Inspectorate in accordance with the law.

Moreover, the management staff of the Headquarters carry out observation and guidance activities in the subsidiary, in accordance with the related procedure, and the results thereof are documented in an Observation Report for the occupational safety and health field.

## **SNN Group Own workforce**



### **Processes to address the negative impacts and the channels provided to own workforce to voice their concerns | S1-3**



SNN are implementate diverse procese și practici pentru a SNN has in place various processes and practices in place to prevent or address, if need be, the actual or potential negative impacts related to the health and safety of employees, or the incidents of workplace violence, harassment or discrimination that may occur. The Internal Regulation of SNN sets out the rights and obligations of the employees and of the employer, including rules on non-discrimination and infringement of the human dignity, conflict of interest, disciplinary procedure or processing of the employee applications or complaints. This regulation is made known to employees and is signed by them for acknowledgment of its provisions.

A form of worker consultation and participation on occupational safety and health matters is to conduct



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surveys on employee satisfaction with how the occupational safety and health requirements are met. The matters reported or proposed by employees are reviewed and considered in definition of the prevention and protection measures and actions, including in the OHSC review meetings.

The processes to address the negative impacts and the channels provided to employees to voice their occupational health and safety concerns are set in the Collective Bargaining Agreement regulating the organisation and functioning of OHSC. Employees can express their occupational health and safety concerns directly to their representatives in the OHSC, as well as in the satisfaction questionnaires distributed at least once a year to review the employee satisfaction with the working conditions and occupational health and safety measures taken.

The CBA sets out the obligation of the SNN Group units to take all necessary measures to protect the life and health of employees, and when the measures envisaged, which aim to improve the working conditions and provide adequate protection in accordance with the legal provisions in force, are not possible, compensation in cash or otherwise is provided in accordance with the law. Thus, the Company provides, at no cost to employees, for those jobs where the working conditions require it: Personal Protective Equipment, protective food, medical services to recover their work capacity, reimbursement of eyeglasses for the staff exposed to video – terminals, private insurance for accidents at work and occupational illnesses, etc.

The effectiveness of corrective Occupational Safety and Health measures is assessed through focused analyses and

reviews in the OHSC, as documented in the OHS Programme Progress Reports and the OHS Annual Report. The conclusions and any resulting actions are documented in the Minutes of the OHSC meetings and in Action Plans assumed by each OHS unit.

The risks related to the human resources activities carried out in the SNN Group are identified, assessed and controlled by means of the “ARM – Risk Management” computer application, especially developed and consistently implemented across the Group. These risks are attached to both current and future projects. Risks are assessed quarterly. SNN staff are encouraged to report in good faith any known, potential or suspected wrongdoing or misconduct, without fear of retaliation, in accordance with the Irregularity Reporting and Whistleblower Protection Procedure.

When there are doubts as to whether something should be reported, employees may seek clarification from the Ethics Advisor or the Compliance Officer in each SNN unit. As to reporting irregularities, employees can report them, via the Whistleblower sections on the Company Intranet and website, to their managers, the Compliance Officer or the compliance representative at branch level, to the Ethics Advisors in SNN, as well as to the Company's management. Managers have been trained to support and encourage the reporting of misconducts, and to help create an environment where employees can raise concerns or ask questions without fear of retaliation.

The Ethics and Compliance Service made sure that employees had multiple channels available to report

compliance issues(including the Whistleblower sections of the Company's intranet and website), allowing them to report any potential violations of SNN's Code of Ethics and Business Conduct, and of any Company policies or laws, without fear of retaliation.

#### FPCU Feldioara

FPCU Feldioara has robust processes in place to ensure the remediation of negative impacts on its own workforce and to cooperate to remediate those negative impacts where the entity has contributed to them.

The Ethics and Integrity Advisor handles complaints in accordance with the Internal Regulation, ensuring a clear and transparent procedure for handling employee concerns. There are specific procedures related to raising employee concerns, whistleblowers and whistleblower protection or processes for securing remedies, such as: Procedure S – SA – 01: Reporting by whistleblowers; Procedure S – SA – 03: Integrity incident assessment and procedure S – SA – 04: Code of ethics and professional integrity.

The communication channels through which employees can voice their concerns are integritate@fpcu.ro, petii@fpcu.ro, and the irregularity reporting form available on the website www.fpcu.ro. For the reporting period there were no cases where remedial action was taken following concerns raised by company employees.

The complaints and grievance handling mechanism is also based on the Complaints Handling Rules managed by the Ethics Advisor, registered under no. 6861/19.06.2024,



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procedure S – SA – 06: Settlement of petitions, the Guidelines on preventing and combating harassment (S – SH – 01) and the Internal Rules including the description of the disciplinary investigation procedure.

The entity assesses that its employees are aware of and have confidence in the structures and processes available to raise concerns and address them through the following methods:

1. **Informative courses:** Employees participate in informative training on the Code of Ethics, the role of the whistleblower and anti – harassment procedures. These courses ensure that employees are familiar with the processes available.
2. **Questionnaire evaluations:** At the end of the courses, employees complete questionnaires to check their understanding and confidence in the structures and procedures.
3. **Protective policies:** The entity has specific policies in place for the protection of whistleblowers, ensuring that individuals who utilise these structures and worker representatives are protected from retaliation.

### EnergONuclear (EN)

According to the P – RU 14 How to apply disciplinary sanctions within EnergONuclear S.A., the Collective Bargaining Agreement (CBA) and the Internal Regulations (IR) of EnergONuclear S.A., the entity has rigorous processes in place to ensure the prompt and effective remedy of negative impacts on staff. The framework also ensures that the management periodically engage in assessment of the effectiveness of the corrective measures.

Specific channels have been set up at company level for employees to express their concerns or needs directly to management. These channels include the possibility to send notifications or e – mails to EN management. The mechanisms for resolving complaints or grievances in relation to employee matters are described in the Internal Rules, chapter 5, point B. The entity supports the availability of notifications and e – mails by implementing accessible and transparent internal communication systems. After receiving notifications and e – mails, EN management analyses them and provides a prompt and detailed response. The entity monitors and tracks issues raised through a dedicated complaints and feedback management system, ensuring that each issue is documented, evaluated and addressed appropriately.

### NucleaelectricaServ

The Internal Regulation and the Collective Bargaining Agreement set out the rights and obligations of the employees and of the employer, including rules on non-discrimination and infringement of the human dignity, conflict of interest, disciplinary procedure or processing of the employee applications or complaints, and information about harassment, anti-bribery, and anticorruption. The Regulation and the procedures are made known to the employees and minutes are signed for acknowledgment of their provisions.

The staff are encouraged to report in good faith any known, potential or suspected wrongdoing or misconduct, without fear of retaliation. Ethical dilemmas or ethics-related complaints are handled by the Ethics Advisor appointed.

When there are doubts as to whether something should be reported, employees may seek clarification from the Ethics Advisor. As to reporting irregularities, employees can report them, via the Whistleblower sections on the Company Intranet and website, to their managers, the Compliance Officer or the ethics counsellor, to the management. The management has been trained to support and encourage the reporting of misconducts, and to help create an environment where employees can raise concerns or ask questions without fear of retaliation.

The occupational safety and health concerns of employees are expressed directly to their representatives in the OHSC. Thus, the Company provides, at no cost to employees, for those jobs where the working conditions require it: Personal protective equipment.



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## SNN Group Working conditions



### Working conditions-related procedures | S1-1



SNN has in place a Human Resources Policy that contains a comprehensive set of guidelines and procedures to effectively manage the Company's human capital.

The objective of the policy is to provide the necessary framework to enable SNN to attract, retain and develop human resources with optimal professional qualifications in order to achieve its objectives, while encouraging a positive and productive working environment for all employees.

This policy applies to the following categories of SNN staff: (i) own employees (under permanent or temporary employment agreements), who may be located in the HQ and branch sites: the branch Nuclear Power Plant and the Nuclear Fuel Plant and (ii) non-employees (included in the category of self-employed workers, micro-enterprises, and persons supplied by third party enterprises performing work agency activities) and who can be located in the HQ and branch sites: the branch Cernavoda Nuclear Power Plant and the Nuclear Fuel Plant.

The policy creates a consistent approach to the management of key human resources matters, and is designed to eliminate any form of discrimination with the existing or potential employees in the employment relations.

Responsibilities:

- **Human Resources Department/Ethics and Integrity Service:** Supervises implementation and compliance with the policy, provides support in cases of discrimination and harassment, and organises the necessary trainings.

- **Team leaders and managers:** Have the responsibility to foster an inclusive work environment and to step in promptly in cases of discriminatory behaviour.
- **All employees (own and non-employees):** Observe the principles of diversity and inclusion and contribute to maintaining a climate based on respect and collaboration.

In order to address the impacts, risks and opportunities identified and assessed as material for the social area, several documents implemented at Group and/or entity level address and manage the issues addressed, as it can be seen in the following table:



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<b>Working conditions</b>		
<b>Secure employment</b>	<p><b>Current, positive impact:</b> Accessibility of social protection for employees.</p> <p><b>Opportunity:</b> Maintenance and development of safe jobs for the own employees</p> <p><i>Applicable at Group level</i></p>	<p>According to the Collective Bargaining Agreement (CBA) signed by each companies, all SNN Group employees benefit from social security at work.</p>
	<p><b>Current, positive impact:</b> Use of employees under fixed-term agreements</p> <p><b>Risk:</b> Rushed conclusion of fixed-term agreements</p> <p><i>Applicable to all entities, except for Energonuclear</i></p>	<p>Use of employees under fixed-term agreements is regulated by each company's CBA. Fixed-term contracts are concluded strictly in accordance with the Labour Code and only to cover for temporary needs (e.g., raising a child) or specific projects (e.g., refurbishment of Unit 1).</p> <p>The fixed-term individual employment agreement is concluded only in the situations expressly provided by the law (duration of a project/programme, pensioners who can combine pension with salary, temporary vacancy, other cases).</p>
<b>Working time</b>	<p><b>Current, positive impact:</b> Working with employees under part-time agreements.</p> <p><i>Applicable for all entities, except for FPCU Feldioara</i></p>	<p>Use of employees under part-time agreements is regulated by each company's CBA. Other matters related to working time are regulated in the Procedure on <i>Keeping Primary Records on Working Time</i>.</p>
<b>Adequate wages</b>	<p><b>Current, positive impact:</b> Providing adequate remuneration for own employees to ensure a decent standard of living.</p> <p><b>Risk:</b> Legislative amendments impacting payrolls.</p> <p><i>Applicable at Group level</i></p>	<p>The waging of own staff is consistently regulated under the Collective Bargaining Agreement (CBA). CBA contains a hierarchy of positions and trades in the SNN Group companies, contains salary limits for each hierarchical level depending on the complexity of the work, and the degree of technicality and professional competence specific to the positions of the Company's organisation chart.</p> <p>The risk is prevented by continuously monitoring the legislative framework and promptly adjusting the payroll policies to ensure compliance.</p>



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Sub-topic/sub-sub-topic	Impacts, Risks and Opportunities	Policy, procedure and/or process that addresses and manages the issues
<b>Working conditions</b>		
<b>Social dialogue</b>	<b>Current, positive impact:</b> Employees representation through trade unions/works councils in the workplace and across borders. <i>Applicable at Group level</i>	The Internal Regulation, the CBA and the Individual Employment Agreement of each company make reference to the employees' right to association and trade union freedom.
<b>Freedom of association, the existence of works councils and the information, consultation and participation rights of workers</b>	<b>Current, positive impact:</b> Respect for the employees' freedom to join a trade union/works council, as well as for their rights to information, consultation and participation.  <i>Applicable at Group level.</i>	
<b>Collective bargaining, including rate of workers covered by collective agreements</b>	<b>Current, positive impact:</b> Ensuring a stable climate, quality of work, overcoming emerging challenges and increasing employee satisfaction through the Collective Bargaining Agreement.  <b>Opportunity:</b> Continuous improvement of the work quality and the provisions of the Collective Bargaining Agreement.  <i>Applicable at Group level</i>	<p>The working conditions and the employment terms of the employees are set out in Collective Bargaining Agreement (CBA), as negotiated with the trade unions established in each SNN Group company.</p> <p>The opportunity is addressed by periodically negotiating the CBA and by periodically (twice a year) assessing the quality of the employees' work, and depending on the results, by taking measures and preparing improvement plans. Also, by continuously developing the employees through both theoretical and practical training in the workplace (knowledge transfer, mentoring, coaching).</p> <p>Improving the work quality is addressed through an integrated strategy combining continuous professional development, efficient organisation of tasks, digitalisation of the processes, clear communication and promotion of employee well-being through behaviours based on respect and appreciation. The main actions include trainings, setting clear objectives, and constant feedback.</p>



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<b>Working conditions</b>		
<b>Work-life balance</b>	<p><b>Current, positive impact:</b> Providing employees with a work – life balance and offering a stable and secure job.</p> <p><b>Opportunity:</b> providing a system of benefits, vacation, holidays, days off and remote working options for employees can increase overall employee satisfaction, as well as satisfaction with working time and can increase retention.</p> <p><i>Applicable at Group level</i></p>	<p>The CBA ensures optimal conditions for work-life balance. All employees are entitled to leave for family reasons or in unforeseen situations.</p>
<b>Health and safety</b>	<p><b>Potential, negative impact:</b> The impact of nuclear incidents on employees health, affecting the reputation of SNN and non-compliance with some legal requirements.</p> <p><b>Opportunity:</b> Maintaining adequate emergency training to all its staff and keeping in place a sound safety culture.</p> <p><i>Applicable for:</i> <i>Cernavoda NPP, Pitesti NFP, FPCU Feldioara &amp; NuclearelectricaServ</i></p>	<p>The Nuclear Safety Policy document approved by the Romanian Nuclear Regulatory Authority confirms the top nuclear safety priority in the Company. It stipulates that every employee of the Company is required to respect Nuclear Safety by certain aspects, as well as to behave in accordance with certain traits of a healthy Nuclear Safety Culture.</p> <p>The Major Accident Prevention Policy is available to all employees, subcontractors and visitors and is processed to employees as part of their training process. There is also an organisational structure for emergency situations, with clear responsibilities and concrete steps to be taken in the referenced situations.</p>



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<b>Working conditions</b>		
<b>Health and safety</b>	<p><b>Current, positive impact:</b> Improving working conditions and increasing employee satisfaction and well – being at work.</p> <p><i>Applicable at Group level</i></p>	<p>The opportunities related to occupational health and safety stem from positive contextual aspects leading to an improved OHS performance, and are addressed in all activities of the occupational health and safety process, according to the occupational health and safety management system implemented and certified in each unit of the SNN Group, according to SR ISO 45001:2018, as well as to model covered by the procedure Risk Management in SNN, as implemented and maintained through the IT application dedicated to the integrated risk management across the SNN Group.</p>
	<p><b>Current, negative impact:</b> Impact of accidents at work on the employee health.</p> <p><i>Applicable at Group level</i></p>	<p>The SNN Management System Manual, includes the organisational policies and general guidelines that are the basis for development of all activities in SNN Group entities, and also includes the occupational health and safety activity; in each branch, a Health and Safety Management Policy is available, and contains the relevant aspects under the management's attention to ensure a clean and safe working environment for all employees, the contractors' staff and visitors. An Occupational Safety and Health Management Programme and a Prevention and Protection Process are also in place in SNN Group's units.</p>



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Sub-topic/sub-sub-topic	Impacts, Risks and Opportunities	Policy, procedure and/or process that addresses and manages the issues
<b>Equal opportunities and treatment for all</b>		
<b>Gender equality and equal pay for work of equal value</b>	<p><b>Current, positive impact:</b> Ability to provide a gender inequality free workplace environment for its employees.</p> <p><i>Applicable at Group level</i></p>	<p>The Collective Bargaining Agreement and the Internal Regulation of each company contain details rules prohibiting direct or indirect discrimination employee, on grounds of gender, sexual orientation, genetic features, age, national affiliation, race, colour, ethnic origin, religion, political belief, social origin, disability, family situation or responsibility, trade union membership or activity.</p> <p>The principles on prevention and mitigation of discrimination are outlined in the SNN's Internal Regulation.</p>
<b>Training and skills development</b>	<p><b>Current, positive impact:</b> Employee access to quality sources of education and career development.</p> <p><i>Applicable at Group level</i></p>	<p>The Human Resources Policy includes provisions for continuous learning, subject to a commitment to ensure that all employees have access to learning, training and development opportunities.</p>
	<p><b>Current, positive impact:</b> Digitalisation of certain processes.</p> <p><i>Applicable at Group level</i></p>	<p>The Training Process Procedure RD-01364-TR001 and the specific process procedures include standards for applying the principles of the systematic approach to training in the development and implementation of the initial and continuous training programmes for Cernavoda NPP's staff. The training and qualification requirements specific to the functions are identified through systematic analysis, and in order to ensure trained and qualified staff for each activity of the plant, training materials are developed, resources (instructors, means, training facilities, etc.) are provided, and initial and continuous training programmes are delivered. Also, Cernavoda NPP staff performing activities with impact on nuclear safety benefit from advanced training through external organisations.</p> <p>The training programmes are managed via the software Oracle Learning Management; for distance learning, a system is implemented through the online learning platform, Moodle.</p>



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Sub-topic/sub-sub-topic	Impacts, Risks and Opportunities	Policy, procedure and/or process that addresses and manages the issues
<b>Equal opportunities and treatment for all</b>		
<b>Employment and inclusion of persons with disabilities</b>	<p><b>Current, positive impact:</b> Inclusion of people with disabilities in the own workforce.</p> <p><i>Applicable at Group level</i></p>	The procedure applied for recruitment, selection, hiring and promotion of staff ensures inclusion of the people with disabilities who meet the employment criteria imposed by the companies of the SNN Group, regardless of the disability criterion.
<b>Measures against violence and harassment in the workplace</b>	<p><b>Potential, negative impact:</b> Impact of workplace violence and harassment incidents.</p> <p><i>Applicable at Group level</i></p>	The Organisation and Functioning Regulation lists the Company's organisational entities that process the grievances filed by the individuals or communities affected by SNN Group's business activities. These grievances are registered and addressed in accordance with the applicable legal provisions.
<b>Diversity</b>	<p><b>Potential, negative impact:</b> Impact of incidents of discrimination on the grounds of gender, racial origin, sexual orientation, age, ethnic origin, religion political beliefs, etc.</p> <p><i>Applicable at Group level</i></p>	Also, through the Internal Regulations and the Human Resources Policy, the SNN Group companies have committed to zero tolerance of discrimination and harassment: Any incident of discrimination or harassment is investigated and sanctioned according to the internal regulations.



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Sub-topic/sub-sub-topic	Impacts, Risks and Opportunities	Policy, procedure and/or process that addresses and manages the issues
<b>Other work-related rights</b>		
<b>Privacy</b>	<p><b>Current, positive impact:</b> Data protection and privacy for own employees.</p> <p><i>Applicable at Group level</i></p>	<p>In SNN, there is an approved Cyber Security Policy, coded: SI-00-01. This document applies to the IT&amp;C and OT systems used and administered in the SNN Group companies, regardless of their purpose, location, technologies used, or the persons operating them. Thus, this policy:</p> <ul style="list-style-type: none"> <li>- Defines the SNN's policy on privacy protection, integrity and availability of IT&amp;C and OT resources/processes/services;</li> <li>- Sets out responsibilities related to ensuring and maintaining the information security.</li> </ul> <p>SNN Group companies have also committed to fully comply with the EU General Data Protection Regulation (GDPR).</p>
<b>Adequate housing</b>	<p><b>Current, positive impact:</b> Access of own employees to affordable and adequate housing.</p> <p><i>Applicable only for Cernavoda NPP</i></p>	<p>The procedure for granting housing to the Cernavoda NPP employees is IDP-BACC-010 - Accommodation Allocation. This describes the procedure for granting job/emergency housing and for allocation of temporary accommodation (hotel-like lodging) owned by SNN – Cernavoda NPP.</p> <p>Adequate housing is maintained done by issuing work orders as per IDP-BACC-006 – Work Order.</p>

In the SNN Group companies, the rights and obligations of the employees, as laid down in the Collective Bargaining Agreement (CBA), as well as in the Internal Regulation, are worded with respect for human rights, the right to work enshrined in the International Charter of Human Rights, and the principles of the fundamental rights set out in the Declaration of the International Labour Organisation (ILO) on the principles and fundamental rights at work, including their transposition into the applicable labour relation legislation, in observance of the principles of consensus and good faith, that are the pillars of labour relations.

The Human Resources Policy, the Collective Bargaining Agreement and the Internal Regulation are aimed at and pay attention to all employees of the SNN Group entities. The internal rules are publicly available on the SNN website, and the Collective Bargaining Agreement and the Human Resources Policy are available internally for employees. ■

The Internal Regulation, the Code of Ethics and Business Conduct,, Management Manual and Policy Statement on the Management System contain the commitment of the SNN Group companies management to the responsibility assumed to avoid causing or taking part in any negative impact on human rights in its activities, and to tackling this impact when it occurs, as well as to prevent or mitigate the negative impact on the human rights that is directly related to the production activities of the Company. SNN has also implemented a Commitment to respect the human rights, which is intended to the staff of the Group's entities and aims to respect and defend

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the human rights in order to protect and enhance the value of its own staff.

Labour exploitation, including child labour or trafficking in human beings, does not raise a concern for the employees in Romania, given that no reported cases of child labour exploitation have been identified, except for cases within family contexts. The Romanian Constitution provides that minors under the age of 15 years may not be hired as employees, and exploitation and use of minors in activities that would harm their health, morality or endanger their life or normal development are prohibited. Currently, there are no UNICEF or other NGOs reports pointing to cases of child labour exploitation in Romania.

The SNN Management System Manual contains provisions reading that the management ensure adequate working conditions for performance of the activities through a permanent control of the regarding occupational health and safety risks in order to mitigate them, and the health status of employees is monitored in order to maintain their working capacity.

Correlatively, in each branch of SNN, a management commitment statement is available regarding compliance with the relevant OHS legal and regulatory requirements, control of occupational health and safety risks, as well as continuous improvement of the OHS performance.

SNN applies a zero – tolerance policy for sexual harassment and for moral harassment in the workplace, and promptly addresses, seriously and confidentially, any allegations of harassment. An operational procedure has been developed for this purpose to provide the framework

for managing incidents of harassment, establishing the persons designated to receive and evaluate complaints made by employees or third parties in relation to SNN employees and the stages of investigation, indicating the measures that may be taken. The list of persons designated to receive, keep records of, and assess the cases of harassment has been disseminated and is posted on SNN intranet; these topics were also addressed in a number of awareness trainings delivered in 2025 internally, but also for the employees of subcontractors. Complaints can be submitted through several channels, in writing or electronically including through the Integrity Whistleblower channel available on both the intranet and the SNN website, accessible to anyone who believes has been or is subject to an act of harassment from an employee of SNN.

The human resources strategies and policies, and the action lines of the administrative and executive management are aimed at respecting the human rights in accordance with international and domestic legislation. The rights and duties of employees are laid down in the Collective Bargaining Agreement (CBA) of the SNN Group, as well as in the Internal Regulation of the SNN Group. These are worded with respect for human rights, the right to work enshrined in the International Charter of Human Rights, and the principles of the fundamental rights set out in the Declaration of the International Labour Organisation (ILO) on the principles and fundamental rights at work, including their transposition into the applicable labour relation legislation, in observance of the principles of consensus and good faith, that are the pillars of labour relations.

SNN pays particular attention to the principle of equal rights and equal opportunities, the right to life, to health protection and the right to a healthy environment, the right to defence and non-discriminatory access to justice, individual freedom and the right to free movement, freedom of expression, freedom of information, the right to elect and be elected, the right to work and the right to strike, the right to association, the protection of people with disabilities, the right to petition, the right to legislative initiatives, the protection of children and young people, prevention of trafficking in human beings through all forms of exploitation, forced labour or duties related to child labour, precarious and unsafe work.



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## SNN Group Working conditions



**Taking action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to working conditions, and effectiveness of those actions and approaches | S1-4**



### SNN (Cernavoda NPP, Pitesti NFP, Headquarters)

The organisational culture of the 3 entities in SNN (Cernavoda NPP, Pitesti NFP, Headquarters) is based on the general beliefs of the Company's members: Safety First (safety has priority), awareness of the importance of nuclear safety and security in all conducted activities, as well as focus on continuous improvement. They adopted the WANO (World Association of Nuclear Operators) & INPO (Institute of Nuclear Power Operations) principles of the continuous improvement culture "Staying on top", and embedded them in the organisational culture and the nuclear safety culture put in place in the SNN Group.

In these units, participation of employees in discussions about all issues concerning occupational safety and health is ensured, according to the legal regulations in force (Law no. 319/2006 on occupational safety and health, Article 18).

SNN Group's management policy statement on the Management System contains a commitment at the highest management level of the Company to ensure conditions for consultation and participation of employees on occupational safety and health matters, whereas the Collective Bargaining Agreement (CBA) contains provisions on the work conditions and the occupational safety and health in the Company.

Under the CBA's provisions, the parties thereto, i.e. the employer and the employees, are bound to employ the necessary efforts to institutionalise an organised system aimed at the continuous improvement of the work conditions. In this context, the Cernavoda NPP, Pitesti NFP

and the Headquarters units are required to take all necessary measures to protect the life and health of employees, and provide the compensation provided under the law, if any. The Employer is also under the obligation to ensure the safety and health of employees in all aspects of their work, and where the unit uses external persons or services, this shall not release them of any liability in this respect.

According to the provisions of the collective bargaining agreement, the obligations of employees related to radiation protection and occupational safety and health may not affect the responsibility of the unit, which is liable for:

- risk assessment and control at source;
- highlighting the risks that cannot be avoided and delivery of training to employees accordingly;
- definition of specific instructions, technologies and standards;
- provision of radioprotection equipment and personal protective equipment;
- putting in place the conditions needed for the work of the Occupational Safety and Health Committee (OHSC), according to the duties provided by the law and depending on the workload;
- planning prevention of the occupational risks;
- definition and application of other measures specific to the activity of the 3 entities.

The employees of the 3 entities are required to take care of their own health and safety, and that of other persons who may be affected by their actions during the working hours, and are therefore required to comply with all the



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provisions of the rules, instructions and regulations issued up in this regard. This obligation stemming from the provisions of the legislation in force (Law no. 319/2006 on occupational safety and health, Article 22), is correlatively contained also in the CBA, the job description of each employee, as well as in the Internal Regulation of SNN.

Specifically, consultation and participation of employees of Cernavoda NPP, Pitesti NFP and the Headquarters in discussions about all occupational health and safety matters takes place in the Occupational Safety and Health Committee (OHSC), organised across the entire Company. The membership of OHSC was updated in 2024 by CEO Decision and remained unchanged during the year 2025. The employee representatives sitting in the OHSC are nominated for a period of 2 years by the representative trade union. OHSC is led by a chairman nominated by the SNN's CEO, and it is organised and operates based on its own Regulation, enclosed to the CBA.

The specifics of the nuclear safety culture fosters a questioning attitude, where all workers are alert to assumptions, anomalies, values, conditions or activities that could have an unwanted effect on workplace safety; thus, workers are encouraged to express their opinions about the work conditions, as well as any aspect of the professional activity that could affect occupational health and safety.

According to the approved 2025 Occupational Safety and Health Programme, the following thematic actions specific to this field have been determined, with time – limits and owners:

- Provision of personal protective equipment (PPE);
- Provision of facilities, checks and tests on the technical protective equipment;
- Provision and performance of external services to check and maintain the technical radiation protection equipment;
- Providing of worker health surveillance services, i.e. occupational medicine, emergency medicine, COVID – 19 testing, medical services to recover the work capacity, medical education services;
- Provision of hygiene and sanitary materials;
- Provision of protective food;
- Provision of determinations and measurements of the pollutant concentration in the exposed workplaces;
- Procuring the occupational health and safety risk assessments;
- Provision of pest control, disinfection and disinfection services;
- Maintenance of optimal conditions for the changing rooms, sanitary facilities and equipment in these facilities;
- Delivery of specific occupational health and safety training to workers;
- Provision of trend/performance analysis in the field of occupational safety and health, including the Key Performance Indicators (KPIs) for the four key elements of excellence in staff safety (management commitment and employee engagement, workplace analysis, risk prevention and control, occupational safety and health training);
- Analysis of the occupational health and safety internal and external OPEX.
- Ensuring the analysis of workplaces by carrying out

field inspections/observations;

- Delivery of specific occupational health and safety training to workers;
- Ensuring organisation of regular meetings of the Corporate Safety Board established in SNN.

In accordance with the occupational health and safety legislation, the 3 entities carry out the assessment of the risks of occupational injury and illness for each workplace within the Company and establish measures to limit, eliminate and/or reduce the risks arising for each existing workplace.

The procedure BCP – 00 – 01 Elaboration, updating and execution of business continuity plans (BCP) within SNN S.A. has been drawn up for Cernavoda NPP, Pitesti NFP and SNN Headquarters. Thus, the SNN Group has the ability to continue to deliver products and provide services within acceptable timeframes, at predefined capacity, for the duration of a disruption by activating the BCP.

#### FPCU Feldioara

FPCU Feldioara has taken significant measures for modernising and improving working conditions. The entity has also implemented actions to have positive impacts on the workforce, including salary rewards such as bonuses and awards, profit sharing, and gift vouchers for employees and their children for the holidays. It also provides welfare benefits for events such as childbirth, death, retirement benefits and energy aid.

Actions, initiatives and their effectiveness are monitored and evaluated through an annual staff appraisal,



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awarding bonuses that include a fixed and a variable part, depending on results. This ensures continuous monitoring and adjustment of measures to achieve positive results for the own workforce.

Necessary and appropriate actions are identified in response to negative impacts through processes detailed in the Internal Rules and Regulations and the Rules for handling complaints by the Ethics Advisor. Other tools include the Anti-Bribery and Anti-Corruption Protection Statement, ISO 37001 certification, the Anti-Bribery Management System Manual and various procedures, such as corruption risk assessment and whistleblower reporting.

The entity has planned measures to mitigate potential risks, such as identifying training needs for assessed employees and partnering with educational institutions to provide qualified personnel. The effectiveness of these measures is tracked by monitoring the progress of training and the success of partnerships in attracting skilled labour. The entity also pursues significant opportunities by evaluating how employees perform their job duties, monitored by supervisors, and by developing professional training programmes in collaboration with educational institutions.

Moreover, the practice of filing declarations of assets and interests and declarations of incompatibilities is ensured so that the Company's practices do not produce or contribute to some negative impacts. The entity manages the significant impacts by applying the provisions of the Internal Rules (IR), the Collective Bargaining Agreement

(CBA) and the Code of Ethics, without requiring additional resources. These instruments set the framework for ensuring an ethical and compliant working environment, thus facilitating the efficient management of significant impacts without additional costs.

### EnergoNuclear

According to the risk register of EnergoNuclear S.A., the entity is actively addressing actions to deal with the risks related to its own workforce. The main action through which EnergoNuclear manages the impacts related to its own workforce is the recruitment of new staff. In this direction, the entity has submitted to the Board of Directors a new organisational chart, necessary to start the recruitment process. This action underlines the Company's commitment to improving its organisational structure and attracting new talent in order to effectively address the needs and challenges of its workforce.

In order to have a positive impact on its own employees, the entity has put in place actions to create new positions in order to reduce workload. EN also monitors and evaluates the effectiveness of its actions and initiatives through the annual performance appraisal of staff. This process allows the company to measure the individual and collective progress of employees, identify additional training needs and adjust existing strategies and programmes. Through a rigorous assessment process it identifies the necessary and appropriate actions in response to its impacts. The main stages include periodically analysing employee performance, identifying specific training needs for each person being evaluated and consulting employee feedback.

Moreover, the entity plans and implements measures to mitigate the potential risks related to its own workforce by closely monitoring the employees' response to the work tasks communicated by the line managers. In terms of opportunities, these are tracked through an employee performance appraisal system. If an employee complies and performs in an exemplary way, he/she can access the higher pay scale, thus benefiting from financial rewards and career advancement opportunities. Resources allocated to manage the Company's significant impacts include ensuring compliance with the provisions of the Collective Bargaining Agreement (CBA), the Internal Regulations and the Code of Ethics. Although the application of these provisions does not imply the direct use of additional resources, the entity invests in employee training, monitoring and evaluation systems, as well as in creating an accountable and transparent organisational culture.

### NuclearelectricaServ

The organisational culture is underpinned by the awareness of the importance of nuclear safety and security in all conducted activities, as well as focus on continuous improvement.

In the Company, participation of employees in discussions about all issues concerning occupational safety and health is ensured, according to the legal regulations in force (Law no. 319/2006 on occupational safety and health, Article 18).

The Collective Bargaining Agreement (CBA) contains provisions on working conditions and health and safety at work within the company. Under the CBA's provisions,



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the parties thereto, i.e. the employer and the employees, are bound to employ the necessary efforts to institutionalise an organised system aimed at the continuous improvement of the work conditions. In this context, the company is required to take all measures which are necessary to protect the life and health of its employees. The Employer is also under the obligation to ensure the safety and health of employees in all aspects of their work.

The consultation and participation of employees in discussions about all occupational health and safety matters takes place in the Occupational Safety and Health Committee (OHSC), organised across the Company. The membership of OHSC was updated in 2025. OHSC is led by a chairman nominated by the CEO, and it is organised and operates based on its own Regulation.

The specifics of the nuclear safety culture fosters a questioning attitude, where all workers are alert to assumptions, anomalies, values, conditions or activities that could have an unwanted effect on workplace safety; thus, workers are encouraged to express their opinions about the work conditions, as well as any aspect of the professional activity that could affect occupational health and safety.

At **SNN Group** level, these actions are designed to remedy risks. Risks are controlled through applicable procedures and legal provisions. Effective monitoring is achieved by observing compliance and managing deviations if they are signalled through the channels developed at Group level. All the Group companies' procedures, the collective















bargaining and individual employment agreements, including the human resources strategy, are designed to maximise employee benefits and minimise negative impacts.

Pay is determined uniformly and fairly under the Collective Bargaining Agreement, based on the role hierarchy, job complexity, and individual professional competence. On the basis of the retirement decision, employees benefit from social retirement benefits according to their uninterrupted seniority in the energy system and retirement benefits for the electricity share according to the provisions of the CBA. Individuals who have received a retirement allowance for their electricity quota and subsequently rejoin the SNN Group as employees will be entitled, during their period of employment, to the energy consumption compensation allowance; however, a portion of the monthly quota shall be deducted, as it has already been compensated through the allowance granted upon retirement.

Additionally, the Group aims to introduce support policies for work-life balance, ensuring that employees are not financially impacted by maternity/paternity leave, childcare, or the care of dependents. Promoting work-life balance through flexible policies, such as flexible working hours tailored to personal needs, can support employee well-being.



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## SNN Group Working conditions



**Targets related to the management of material negative impacts, positive impact promotion, and management of material risks and opportunities concerning the working conditions.**  
| S1-5



The SNN Group companies have in place a number of codes of conduct and management systems, where metrics and annual targets (as described in ESRS S1 – 14) are set for the occupational safety and health process:

- Staff protection during their performance of activities in the SNN Group
- Compliance with the OHS statutory requirements
- Achievement of the OHS programme
- Ensuring the staff health state
- Performance of the set OHS actions
- Compliance with the OHS training programme.

In terms of social protection, the benefits granted to SNN Group employees are above the minimum required by law. On the other hand, in order to maintain the balance between personal and professional life, the SNN Group companies respect the legal rest time. In order to support the restoration of work capacity, the number of days of leave negotiated for the Collective Bargaining Agreement will be maintained.

In 2024, the following targets were set, following the material aspects assessed and the related impacts, risks and opportunities identified:

Indicator: OHS targets for the SNN Group (6 entities)	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Number of employee grievances concerning OHS	No. of persons	0	0	0	0	0
Rate of accidents at work	Accidents /manhours%	0.13	0.08	0.08	0.08	0
Compliance degree (%)	%	100	100	100	100	100
Nonconformities found by the inspection bodies (OHS)	No. of nonconformities	1	0	0	0	0
Measures carried out/measures planned (%) (OHS)	%	100	100	100	100	100
Occupational illness rate	Illness/ manhours%	0	0	0	0	0



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Indicator: OHS targets for the SNN Group (6 entities)	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Degree of implementation of the measures and actions within the set time – limits (OHS)	%	100	100	100		100
Degree of attaining the objectives (OHS)	%	100	100	100		100
Delivery of training according to the programme (no. trainings delivered/no. trainings planned)	%	100	100	100		100
No. of accidents at work	No. of accidents	3	2	2		2
No. of deaths	No. of deaths	0	0	0		0
Number and rate of accidents at work reported in the SNN units	Accidents /manhours%	0.13	0.07	0.07		0.07
Number of days lost due to work -related injuries and fatalities caused by work -related accidents, occupational illnesses and illness-caused fatalities	No. of days	67	75	65		60
Lost time incident rate (LTIR)	Days/manhours%	2.85	2.68	2.33		2.15
Number of employees trained on occupational health and safety	%	100	100	100		100

Metrics for sub-topics: Adequate wages, Secure employment, and Work-life balance: SNN targets (Cernavoda NPP, Pitesti NFP and Headquarters)	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Adequate wages – maintaining the pay scale as under through the CBA	Percentage	100%	100%	100%		100%
Secure employment – the provision rate of benefits under the family CBA)	Percentage	100%	100%	100%		100%
Work-life balance – average leave days taken annually/employee > statutory minimum annual entitlement	No. of days	>21	>21	> 21		>21



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Metrics for sub-topics: Adequate wages, Secure employment, and Work-life balance: NuclearelectricaServ Targets	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Adequate wages – maintaining the pay scale as under through the CBA	Percentage	100%	100%	100%	100%	100%
Secure employment – the provision rate of benefits under the family CBA)	Percentage	100%	100%	100%	100%	100%
Work-life balance – average leave days taken annually/employee > statutory minimum annual entitlement	No. of days	>/=20	>/=20	>/=20	>/=20	>/=20

Metrics for sub-topics: Adequate wages, Secure employment, and Work-life balance: Targets for FPCU Feldioara	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Adequate wages – maintaining the pay scale as under through the CBA	Percentage	100%	100%	100%	100%	100%
Secure employment – the provision rate of benefits under the family CBA)	Percentage	100%	100%	100%	100%	100%
Work-life balance – average leave days taken annually/employee > statutory minimum annual entitlement	No. of days	>24	>24	>24	>24	>24



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Metrics for sub-topics: Adequate wages, Secure employment, and Work-life balance: Targets for EnergoNuclear	MU	Base year 2023*	Target for 2030	Target for 2035
Adequate wages – maintaining the pay scale as under through the CBA	Percentage	100%	100%	100%
Secure employment – the provision rate of benefits under the family CBA)	Percentage	100%	100%	100%
Work-life balance – average leave days taken annually/employee > statutory minimum annual entitlement	No. of days of leave (more than the minimum number of statutory leave days)	>21	>21	>21

The targets were set by the 6 entities based on existing and available input data in 2024, taking into account the development scenarios of the investment projects and correlating this data with the development schedule. Based on the existing human resources policies listed in chapters S1-1 chapters, and on the metrics tracked in the materiality assessment or the ESRS guidelines, specific criteria were considered for setting these targets. In setting the targets, no stakeholders other than the experts in the departments responsible for these areas were included in the consultation. The targets were set by the employees of all HR entities based on the HR data and the development plans estimated or assumed by them. These targets cannot be set by other stakeholders who do not have access to the input data.

It is important to note that these targets may undergo changes depending on the medium and long-term















developments. To ensure the accuracy and relevance of the set targets, these will be continuously monitored and adjusted against the evolving dynamics of the projects and the economic and technological context. In 2025, there were no changes in targets.

The targets were set in 2024 and there have been no previous performance issues. Then, these targets are monitored annually. The responsibilities for monitoring the targets currently lie significantly with the HR staff. In the future, employee involvement on target monitoring through recurring internal reporting may be considered. As the targets have been set in the previous year, their level of relevance, comparability can be inferred over time, over the coming years. Any changes will be disclosed and reported accordingly. The targets have been empirically set giving due regard to performance, results over time, procedures, strategy, codes and the statutory obligations

and considering that the employee rights are respected and that there are no serious cases of their violation in the SNN Group.

The increase in the targets until 2035 is directly proportional to the increase in the number of staff because the activities in LNTP and FNTP will be much more complex and will require a much greater effort from EnergoNuclear S.A. Regarding the targets for the years 2040 – 2050, EnergoNuclear S.A. is a project company, an SPV established specifically for the continuation of the Project for the construction and completion of Units 3 and 4 of the Cernavoda NPP, and after their commissioning the Company's activity objective will be fulfilled (approx. 2035). Consequently, for EnergoNuclear S.A., the classical methods of calculation and reduction of GHG emissions cannot be applied as in the case of companies that have well defined, concrete activities and whose number of staff does not fluctuate substantially depending on each stage of activity. Also, EnergoNuclear S.A.'s vision is strictly limited by the project's completion date (approx. 2035). Targets will then be tracked and updated, if necessary. At the same time, account will be taken of the increasing level of improvement.

All targets have been building on the assumption that they would have no negative impact on the own workforce and based on current data, procedures, codes and the strategy, but also that the workforce metrics related to workforce diversity and pay equity would increase. Targets have been set taking into account the statutory provisions of the Romanian labour laws regarding pay, equity, and envisaged also minimisation of the negative impacts and compliance with the of the UN Global Compact principles.

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## SNN Group Working conditions



### Characteristics of the SNN Group's employees | S1-6



At the end of 2025, the SNN Group had a total of 3,570 employees, distributed across all 6 sites: Cernavoda NPP, Pitesti NFP, the Headquarters, FPCU Feldioara, EnergoNuclear and NuclearelectricaServ compared to a number of 3,364 employees registered on 31 December 2024. Data reporting was conducted on a consolidated basis as of the end of the reporting period (31 December 2025).

#### Number of employees

The number of SNN Group employees is compiled in a HR system devised and implemented across the Company (Report Card), which covers for the main HR indicators to ensure good visibility of the performance of the HR processes across the organisation.

The total number of employees includes the actual number of employees who, on 31 December 2025, have signed an Individual Employment Agreement and are registered in the General Register of Employees. Actual number means the number of employees with active individual employment agreement + the number of employees with suspended individual employment agreement.

For the 3 entities (Cernavoda NPP, Pitesti NFP and SNN Headquarters) as at 31 December 2025, of the total **2,498** employees, **34** employees have their individual employment agreement suspended. Number of employees with an active individual employment agreement as at 31 December 2025 is **2,464**.

Number of employees broken down by gender and site (final, at year end)

31.12.2025							
Gen	SNN			FPCU Feldioara	EnergoNuclear	Nuclearelectrica Serv	Total Group
	Cernavoda NPP	Pitesti NFP	SNN Headquarters				
Male	1,387	214	121	177	45	284	2,228
Female	495	160	121	109	23	434	1,342
Others	0	0	0	0	0	0	0
Not declared	0	0	0	0	0	0	0
<b>Total Employees/entity</b>	<b>1,882</b>	<b>374</b>	<b>242</b>	<b>286</b>	<b>68</b>	<b>718</b>	<b>3,570</b>



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31.12.2024							
Gen	SNN			FPCU Feldioara	EnergoNuclear	Nuclearelectrica Serv	Total Group
	Cernavoda NPP	Pitesti NFP	SNN Headquarters				
Male	1,323	213	113	174	30	398	2,251
Female	475	157	121	114	13	233	1,113
Others	0	0	0	0	0	0	0
Not declared	0	0	0	0	0	0	0
<b>Total Employees/entity</b>	<b>1,798</b>	<b>370</b>	<b>234</b>	<b>288</b>	<b>43</b>	<b>631</b>	<b>3,364</b>

Number of employees broken down by type of agreement and gender, in the SNN Group, consolidated:

31.12.2025				
FEMALE	MALE	OTHER*	NOT DECLARED	TOTAL
<b>Number of employees (head count/FTE)</b>				
1,342	2,228	0	0	3,570
<b>Number of permanent employees (head count/FTE)</b>				
1,334	2,205	0	0	3,539
<b>Number of temporary employees (head count/FTE)</b>				
8	23	0	0	31
<b>Number of non-guaranteed hours employees (head count/FTE)</b>				
0	0	0	0	0
<b>Number of full-time employees (head count/FTE)</b>				
1,334	2,217	0	0	3,551
<b>Number of part-time employees (head count/FTE)</b>				
8	11	0	0	19

\* Gender is that indicated by the employees themselves

31.12.2024				
FEMALE	MALE	OTHER*	NOT DECLARED	TOTAL
<b>Number of employees (head count/FTE)</b>				
1,278	2,086	0	0	3,364
<b>Number of permanent employees (head count/FTE)</b>				
1,278	2,085	0	0	3,324
<b>Number of temporary employees (head count/FTE)</b>				
12	28	0	0	40
<b>Number of non-guaranteed hours employees (head count/FTE)</b>				
0	0	0	0	0
<b>Number of full-time employees (head count/FTE)</b>				
1,276	2,083	0	0	3,346
<b>Number of part-time employees (head count/FTE)</b>				
6	12	0	0	18



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Number of employees broken down by type of agreement and site

31.12.2025						
SNN			FPCU Feldioara	Energonuclear	NuclearelectricaServ	TOTAL
Cernavoda NPP	Pitesti NFP	SNN Headquarters				
<b>Number of employees (head count/FTE)</b>						
1,882	374	242	286	68	718	3,570
<b>Number of permanent employees (head count/FTE)</b>						
1,882	374	242	255	68	718	3,539
<b>Number of temporary employees (head count/FTE)</b>						
0	0	0	31	0	0	31
<b>Number of non-guaranteed hours employees (head count/FTE)</b>						
0	0	0	0	0	0	0
<b>Number of full-time employees (head count/FTE)</b>						
1,881	372	239	286	61	712	3,551
<b>Number of part-time employees (head count/FTE)</b>						
1	2	3	0	7	6	19
31.12.2024						
SNN			FPCU Feldioara	Energonuclear	NuclearelectricaServ	TOTAL
Cernavoda NPP	Pitesti NFP	SNN Headquarters				
<b>Number of employees (head count/FTE)</b>						
1,798	370	234	288	43	631	3,364
<b>Number of permanent employees (head count/FTE)</b>						
1,798	370	234	249	42	631	3,324
<b>Number of temporary employees (head count/FTE)</b>						
0	0	0	39	1	0	40
<b>Number of non-guaranteed hours employees (head count/FTE)</b>						
0	0	0	0	0	0	0
<b>Number of full-time employees (head count/FTE)</b>						
1,798	368	231	288	38	623	3,346
<b>Number of part-time employees (head count/FTE)</b>						
0	2	3	0	5	8	18

The total percentage of female persons employed in the SNN Group in years 2021 – 2025 observes a constant trend, this being mainly determined by the particulars of the jobs in the energy production industry, the availability and effort specifics of which make them more appropriate for men. However, the percentage is higher than the average industry figure in the Nuclear Energy Agency (NEA) member countries. According to the OECD NEA statistics, in 2021, women accounted for less than a quarter (24.9%) of the total nuclear workforce (NEA, 2023), while the percentage was 29.6% for the entire SNN Group.

Total percentage of employed women

Number of female employees, at year end	2024	2025
Total percentage of female persons employed in the Headquarters, Cernavoda NPP, Pitesti NFP	37.9%	31.06%
Total percentage of women in executive management	23.53%	30.08%

\*The data is valid for the entities Cernavoda NPP, Pitesti NFP and the Headquarters.

The total percentage of female employees in the SNN Group is 37.59% as at 31 December 2025, compared to 33%, as at 31 December 2024.

### SNN (Cernavoda NPP; Pitesti NFP; SNN Headquarters)

In 2025, 57 employees left SNN, either voluntarily (resignations), or by retirement (early retirement or retirements due to reduced retirement age) or death. The staff turnover rate<sup>15</sup> for the entities Cernavoda NPP, Pitesti NFP and SNN Headquarters was 2.40%, staying flat compared to the previous years (a staff turnover rate in 2024 of 2.26%). The personnel turnover rate is calculated as a percentage between the average number of employees and the number of voluntary and/or unplanned terminations at the reference date (by voluntary terminations we mean unplanned terminations: resignation, termination of the individual employment agreement with the agreement of the parties, partial early retirement, death). Most employees have a full – time employment agreement, with only 6 employees having part – time agreements (4 hours/day/20 hours/week and 6 hours/day/30 hours/week).

### FPCU Feldioara

In 2025, 8 people had unplanned terminations. The personnel turnover rate was 2.8%.

### EnergoNuclear

During the reporting period, the entity recorded 6 terminations of Individual Employment Agreements and 31 new Individual Employment Agreements. Thus, the turnover rate was 7.27%.

<sup>15</sup> The personnel turnover rate is calculated as a report between the average number of employees and the number of voluntary terminations at the reference date (by voluntary terminations we mean unplanned terminations: resignation, termination of the individual employment agreement with the agreement of the parties, partial early retirement, death)

### NuclearelectricaServ

In 2025, NuclearelectricaServ reported 105 departures, of which 15 were intra-group transfers, representing a turnover rate of 13.24% of the average number of employees (excluding intra-group departures). The fluctuation is high due to the large number of staff migrating to the Cernavoda NPP branch (generally specialised staff in various fields) and due to the specific nature of the company, namely the provision of services (cleaning, construction, carpentry, etc.).

## SNN Group Working conditions



### Coverage of collective bargaining and social dialogue | S1-8

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The working conditions and the employment terms of the employees are set out in Collective Bargaining Agreement (CBA), as negotiated with the trade unions of the SNN Group companies. The Internal Regulation, the CBA and the Individual Employment Agreement make reference to the employees' right to association and trade union freedom.















All the employees of the companies, regardless of their trade union (non-)membership, are covered by the provisions of the same CBA. SNN companies operate only in Romania, and there are no employees working abroad.

Employee representation is ensured by participation of the representative trade union (Cernavoda NPP Trade Union) in meetings and discussions with the management representatives. In the SNN Group, there are 2 other trade unions, but they are not representative for the Company: Free Energetica Nucleara '90 Trade Union and Pitesti NFP Trade Union. The relationship with trade unions is permanent and consists of meetings/consultations; the provisions of the CBA are negotiated after on – going consultations of the Negotiation Committee appointed both by the management and by the representative trade union operating in the Company, in accordance with the legal provisions in force (Law no. 367/2022).

The 2023 – 2027 SNN's administration plan contains provisions concerning collective bargaining, which takes place according to the legal provisions applicable to conclusion of the Company's CBA. In 2023, a Collective Bargaining Agreement was concluded in SNN; this was duly registered the Territorial Labour Inspectorate of Bucharest, further to a collective bargaining process conducted in keeping with the applicable legal requirements.



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Number of employees at the end of the year	SNN			FPCU Feldioara	EnergoNuclear	Nuclearelectrica Serv	Total
	Cernavoda NPP	Pitesti NFP	SNN Headquarters				
Number of employees covered by collective bargaining agreements	1882	374	242	286	68	718	3,570
Percentage of employees covered by collective bargaining agreements	100%	100%	100%	100%	100%	100%	100%
Number of unionised employees	1017	123	30	257	0	586	2,013
Percentage of employees who are also union members	54%	33%	12%	90%	0%	82%	56%
31.12.2024							
Number of employees at the end of the year	SNN			FPCU Feldioara	EnergoNuclear	Nuclearelectrica Serv	Total
	Cernavoda NPP	Pitesti NFP	SNN Headquarters				
Number of employees covered by collective bargaining agreements	1,798	370	234	288	43	631	3,364
Percentage of employees covered by collective bargaining agreements	100%	100%	100%	100%	100%	100%	100%
Number of unionised employees	1,044	161	27	272	0	495	1,999
Percentage of employees who are also union members	58%	44%	12%	94%	0%	78%	59%

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## SNN Group Working conditions



### Adequate wages | S1-10



#### SNN (Cernavoda NPP; Pitesti NFP; Headquarters); FPCU Feldioara, Energonuclear

Agreement (CBA). CBA contains a hierarchy of positions and trades in the SNN Group, contains salary limits for each hierarchical level depending on the complexity of the work, and the degree of technicality and professional competence specific to the positions of the Company's organisation chart.

Salary negotiation is sensitive to the requirements contained in the Job Description (enclosed to the Individual Employment Agreement), and considers a comparative evaluation with the average income earned in similar activities at national and international level; thus, a salary the amount of which is determined in accordance with the limits of the Hierarchy List of Positions, included in the CBA of the company, is obtained. When determining the limits of the Hierarchy List of Positions provided in the CBA, consideration was given to the average levels attained for similar activities at national and international

level. SNN, as holder of the license for nuclear installations is required to put in place appropriate measures and policies so as to ensure a competitive pay at least equal to the average remuneration paid by similar organisations in the nuclear industry of the European Union for the functions important to nuclear safety, according to the Nuclear Safety Rules issued by CNCAN, the regulator in the nuclear field.

In 2025, SNN used a template Individual Employment Agreement for both limited – term employees, and those employed under open – ended contracts. The Individual Employment Agreement implemented under the CBA contains provisions in accordance with the applicable national legislation and observes the clauses laid down in the Order no. 64/2003 approving of template Individual Employment Agreement.

In 2025, the SNN's CBA was amended, under a duly executed Addendum thereto, to the effect of modifying the pay point effective 1 June 2025.

## SNN Group Working conditions



### Social security | S1-11



#### SNN (Cernavoda NPP; Pitesti NFP; SNN Headquarters) & FPCU Feldioara;

According to the Collective Bargaining Agreement (CBA), all SNN employees benefit from social security at work.

When resuming work, the employees who used to be on leave for temporary incapacity for work, maternity leave, maternity leave, leave to care for a sick child up to 7 years of age or vocational training leave, who had temporarily suspended work, but not terminated their employment relationship (strike, prior disciplinary investigation, standby regime), who have not benefited of the provisions of Article 6.24 (1) and (2) of the CBA, this right receive this entitlement the end of the month concerned.

Employees seconded to SNN units receive their bonuses from the units where they render the work, on their respective payment date.



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The rights provided at Article 6.24 (1) of the CBA shall be granted by Protocol concluded by the SNN CBA Negotiation Committee. These rights include:

- SNN units will grant the employee a financial aid at the birth or adoption of each child (up to 18 years old);
- SNN employees benefit from a lump sum aid to compensate for electricity consumption;
- Retirement aid for electricity quota;
- SNN employees benefit from a lump – sum aid to compensate for heat consumption;
- Employees affected by layoffs for reasons not related to their person benefit of active measures to control unemployment, as well as of compensation under the terms of the law and of the CBA;
- Where the employee has totally lost the ability to work as a result of an accident at work or in connection with work, an occupational illness or in connection with their profession, they receive compensation payments under the insurance policy taken out by SNN;
- SNN employees who have totally lost their ability to work as a result of work-related accidents or occupational or professional illnesses are entitled to an aid on their retirement date;
- In the event of the employee's death in an accident at work or as a result of an occupational or work-related illness, they benefit from the provisions of the insurance policy taken out by SNN;
- In the case of occupational or work-related illnesses and accidents at or related to work, the employees concerned will be referred for medical treatment;
- Employees who have contracted occupational or profession-related illnesses while rendering their work will be provided means of recovery their work capacity

by SNN, in specialised units, until they meet the retirement conditions for loss of work ability, from funds allocated for occupational safety and health.

Other benefits include: reimbursement of the cost of eyeglasses to the eligible staff, provision of transport to and from work by public transport on the basis of monthly passes or similar payment documents, contributions made on behalf of employees to a voluntary pension fund.

### EnergoNuclear

In EnergoNuclear, employees benefit from unemployment insurance, child – raising leave allowance if they have a contribution period according to the law, compensatory payments upon retirement according to the Collective Bargaining Agreement. Also, through the coverage of the OHS management system, in case of occupational or professional illnesses, employees benefit from the effects of the contractual insurance policy and sick leave.

### NuclearelectricaServ

At NuclearelectricaServ all employees benefit from social protection and rights which are granted by the CBA:

- material aid on the birth of each child;
- material aid when the employee gets married
- material aid upon the death of the employee or a family member (child, parents, spouse).

Other benefits include: provision of transport to and from work by public transport on the basis of monthly passes or similar payment documents; reimbursement for prescription glasses for the eligible staff.

NuclearelectricaServ employees benefit from social protection against loss of income caused by major life events, in accordance with applicable legislation. In case of illness, sick leave is paid in accordance with the law. As regards unemployment, from the date from which the employee starts working for the company, compulsory contributions are paid, according to the law. For injuries at work and acquired disability, the entity pays for such situations only if there is a sick leave, according to the law, and there are no other bonuses provided by the Collective Bargaining Agreement or other internal documents. The parental leave is paid by the state, following the suspension of the individual employment agreement (CIM), but the entity grants a financial aid at the birth of the child. On retirement, no additional bonuses are offered.



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## SNN Group Working conditions



### Health and safety metrics | S1-14



Performance of the Occupational Health and Safety process is quantified through performance indicators attached to the specific objectives, which are correlated to the general objectives set at SNN Group level. Thus, in order to implement the measures or actions provided in the Occupational Health and Safety Management Programme put in place in the SNN Group units, the annual target for the metric Attainment of OHS objectives and targets in 2025 was set between 85% and 100%; therefore, the target was attained.

At Company level, the *Prevention and Protection* process is documented in the process data – sheet, and the occupational health and safety monitoring and measurement criteria are:

- monitoring and maintaining the health of the staff in order to preserve their ability to work;
- avoiding accidents at work and occupational illnesses that can cause temporary incapacity to work or death;
- controlling and keeping the risk of injury as low as possible;

- setting rules, internal order measures and responsibilities in the organisation, and performing activities case of an emergency;
- preventing any conditions that are likely favour occurrence of emergencies;
- limiting the consequences of emergencies.

Process Analysis Reports are prepared annually; for 2025, the status of occupational health and safety activity is as follows:

2025				
CRITERION	METRIC	SET TARGET	ACTUAL VALUE IN 2025	TARGET SET FOR THE NEXT YEAR
Staff protection during their performance of activities in the SNN Group	Rate of accidents at work	0.08 <sup>16</sup>	0.03	0.08
Compliance with the OHS statutory requirements	Compliance degree (%)	100%	100%	100%
	Nonconformities found by the inspection bodies	0	0	0
Achievement of the OHS programme	Measures carried out/measures planned (%)	95%	99.7	100%
Ensuring the staff health state	Occupational illness rate	0	0	0
Action achievement	Degree of implementation of the measures and actions within the set time – limits	100%	100%	100%
Achievement of the OHS objectives	Degree of attaining the objectives	100%	100%	100%
Compliance with the OHS training programme	Delivery of training according to the programme (no. trainings delivered/no. trainings planned)	100%	100%	100%

<sup>16</sup> The target was set at 0.08 in 2025, compared to 0 in 2024. This was not exceeded in 2025 and so was maintained until the following year.



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2024				
CRITERION	METRIC	SET TARGET	ACTUAL VALUE	TARGET SET FOR THE NEXT YEAR
Staff protection during their performance of activities in the SNN Group	Rate of accidents at work	0	0.19	0
Compliance with the OHS statutory requirements	Compliance degree (%)	100%	100%	100%
	Nonconformities found by the inspection bodies	0	0	0
Achievement of the OHS programme	Measures carried out/measures planned (%)	95%	100%	95%
Ensuring the staff health state	Occupational illness rate	0	0	0
Action achievement	Degree of implementation of the measures and actions within the set time – limits	100%	100%	100%
Achievement of the OHS objectives	Degree of attaining the objectives	100%	100%	100%
Compliance with the OHS training programme	Delivery of training according to the programme (no. trainings delivered/no. trainings planned)	100%	100%	100%

## SNN

The SNN Management System Manual, includes the organisational policies and general guidelines that are the basis for development of all activities in SNN, and also includes the occupational health and safety activity; in each branch, a Health and Safety Management Policy is available, and contains the relevant aspects under the management's attention to ensure a clean and safe working environment for all employees, the contractors' staff and visitors.

In accordance with the provisions of Law 319/2006 on occupational health and safety, for all workplaces of SNN hazards are identified and risks are assessed for each component of the work system, i.e. who performs the job, workload, work tools/equipment and work environment. These assessments are available to all workers by posting on the Intranet of SNN units and are included in the annual occupational health and safety training topic.

In order to assess the risks of accidents at work and occupational illnesses, the Company applies the Method of the National Research – Development Institute of Occupational Safety (INCDPM); for all workplaces in the Company. According to this method, the global risk level determined for each SNN unit and for the entire Company falls into the category of accepted risks, the annual trend of which is constant, as weighted average, with a value of 3.13 for the entities Headquarters and Cernavoda NPP and Pitesti NFP in 2024 and 2023 and of 3.12 in 2025.

In the SNN Group (including the subsidiaries FPCU Feldioara, EnergoNuclear and Nuclearelectrica Serv) the



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overall risk level is 3.16. Prevention and protection measures are determined to control the global risk of accidents at work or occupational illness, under annual OHS Programmes.

Assessment of the accidents at work and occupational illness risks is the basis for the of occupational health and safety management strategy and is followed by the control of these risks by defining preventive measures, which are included in the annual prevention and protection plan prepared in accordance with the provisions of the Implementing Rules of Law no. 319/2006 on occupational health and safety, approved by Government Decision no. 1425/2006, as subsequently amended and supplemented; the measures contained therein are reviewed in the Meetings of the Occupational Health Safety Committee set up in the Company in accordance with the applicable legal provisions. The measures contained in the prevention and protection plan have been annually allocated resources for implementation under the Company's approved Income and Expenditure Budget.

Assessment of the risks of accidents at work and occupational illness is a carefully review process and is updated when events occur in the work system, new work methods/technologies are adopted, attitudes/behaviours are noticed that require reconsideration of classification of risks identified in the Company's workplaces by impact/likelihood.

The opportunities related to occupational health and safety stem from positive contextual aspects leading to an improved OHS performance, and are addressed in all

activities of the occupational health and safety process, according to the occupational health and safety management system implemented and certified in each unit of SNN, according to SR ISO 45001:2018, as well as to model covered by the procedure Risk Management in SNN, as implemented and maintained through the IT application dedicated to the integrated risk management across SNN.

The findings of the occupational health and safety risk analysis required adoption of employee awareness – raising topics, which consisted of sending emails or displaying information materials in the production units with a view to preventing occurrence of events in the work system or due to behaviours that can be harmful to workers' health (smoking).

The particular of the nuclear safety culture fosters a questioning attitude, where all workers are alert to assumptions, anomalies, values, conditions or activities that could have an unwanted effect on workplace safety; thus, employees are encouraged to express their opinions about the work conditions, as well as any aspect of the professional activity that could have a negative impact on occupational health and safety.

Workers assume personal responsibility for safety, as part of the extensive nuclear safety culture specific to this industry. Thus, the responsibility and authority for safety and health in each workplace are well defined and clearly understood. The reporting relationships, positional authority and team responsibilities highlight the major importance of workplace safety.

The information about occupational health and safety is duly communicated to the stakeholders; thus, the annual report on occupational health and safety is submitted to the Territorial Labour Inspectorate. In the Company's branches, the SRAC – cert certification body conducted certification audit and surveillance audit actions annually to independently check the OHS information against the Occupational Health and Safety Management System, implemented according to SR ISO 45001:2018.

The health of SNN workers is monitored in accordance with the provisions of the Government Decision no. 355/2007 on the supervision of the health of workers in workplace, through specialised occupational medicine services provided under contract. Each worker takes an occupational medicine examination, at least annually, in accordance with the occupational risks identified for the activity carried out in their respective workplace. The occupational medicine doctor issues a skill data – sheet for each employee, that contains the medical opinion.

SNN's management system is certified according to ISO 45001 for all SNN Group units, so that all the employees of the SNN Group companies, as well as the non-employees working in the SNN Group units are covered by the occupational health and safety management system of each SNN Group company.

In application of the provisions of Law no. 319/2006 on occupational health and safety and of the Implementing Rules of this law, the events produced in the work system are immediately communicated to the stakeholders, and



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are investigated, recorded and reported on in accordance with the applicable legal provisions.

### FPCU Feldioara

FPCU Feldioara's own workforce is fully covered by the health and safety management system which includes the following measures:

- 1. Internal policies and procedures** – clear health and safety policies are in place that are regularly reviewed and communicated to all employees.
- 2. Training and education** – All employees receive ongoing health and safety training, including sessions on accident prevention and safe behaviour in the workplace.
- 3. Risk monitoring** – Risks to the health and safety of employees are regularly assessed and preventive measures are adjusted as new hazards are identified.
- 4. Personal protective equipment** – All employees are provided with personal protective equipment appropriate to the type of work performed.
- 5. Decontamination of staff** – all employees benefit from decontamination at the end of working hours.
- 6. Communication and reporting** – There are open channels of communication for reporting any incidents or unsafe working conditions and this process is regularly monitored

### Accidents at work occurred in the SNN Group units in years 2020 – 2025

Events	2024	2025
No. of accidents at works with temporary work incapacity (own employees)	2	1
No. of accidents at work with invalidity (own workforce)	0	0
No. of accidents at work with fatalities (own workforce)	0	0
Total accidents at work (own employees)	2	1

*\*) The report submitted covers only the fatalities due to work-related injuries, and it does not include road traffic events that were not related to work-related activities (two events in 2025); the two fatalities having occurred in 2024 are under investigation by the authorities (Constanta Territorial Labour Inspectorate) and the procedures have not been completed on the date of this report; the investigations will decide whether the events can be classified as accidents at work, according to the provisions of Law no. 319/2006 and the Rules implementing such law, as approved by HG no. 1425/2006.*

### Number of fatalities due to work-related injuries and illnesses in the SNN Group units

2025			
UNIT	OWN WORKFORCE FATALITIES	CONTRACTOR FACILITIES	TOTAL WORK-RELATED FATALITIES
Cernavoda NPP	0*	0*	0*
Pitesti NFP	0	0	0
HQ	0	0	0
FPCU Feldioara	0	0	0
Energonuclear	0	0	0
NuclearelectricaServ	0	0	0
<b>Total</b>	<b>0*</b>	<b>0*</b>	<b>0*</b>
2024			
UNIT	OWN WORKFORCE FATALITIES	CONTRACTOR FACILITIES	TOTAL WORK-RELATED FATALITIES
Cernavoda NPP	0*	0*	0*
Pitesti NFP	0	0	0
HQ	0	0	0
FPCU Feldioara	0	0	0
Energonuclear	0	0	0
NuclearelectricaServ	0	0	0
<b>Total</b>	<b>0*</b>	<b>0*</b>	<b>0*</b>



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## Number and rate of accidents at work reported in the SNN Group units

2025			
UNIT	NO. OF TLI ACCIDENT	NO. OF ACCIDENT WITH INVALIDITY	NO. OF ACCIDENT WITH FATALITY
Cernavoda NPP	0	0	0
Pitesti NFP	0	0	0
HQ	0	0	0
FPCU Feldioara	0	0	0
Energonuclear	0	0	0
NuclearelectricaServ	1	0	0
<b>Total</b>	<b>1</b>	<b>0</b>	<b>0</b>
2024			
UNIT	NO. OF TLI ACCIDENT	NO. OF ACCIDENT WITH INVALIDITY	NO. OF ACCIDENT WITH FATALITY
Cernavoda NPP	2	0	0
Pitesti NFP	0	0	0
HQ	0	0	0
FPCU Feldioara	0	0	0
Energonuclear	0	0	0
NuclearelectricaServ	0	0	0
<b>Total</b>	<b>2</b>	<b>0</b>	<b>0</b>

The 2025 rate of work-related injuries (the respective number of cases divided by the total number of hours worked by persons of the own workforce and then multiplied by 1,000,000), taking into account also the staff of the subsidiary NuclearelectricaServ. where the only accident at work occurred in 2025 happened, is:

- for SNN Group employees (including subsidiaries):  $0.17 = 1 * 1.000.000 / 5.803.019$
- for SNN Group contractors:  $0 = 0 * 1.000.000 / 1.770.609$

Over the last four years, the SNN Group has not recorded any accidents at work resulting into disability or death, and the accidents with temporary incapacity for work remain at a low level.

All the events produced in the work system of the Company are carefully reviewed and processed by workers, determining actions to reassess the risks of accidents at work and occupational illnesses for the workplaces involved or potentially involved, and actions aimed at eliminating their causes are taken.

No occupational illnesses were reported in 2025.

## Number of days lost due to work-related injuries and fatalities caused by work-related accidents, occupational illnesses and illness-caused fatalities

2025			
UNIT	NUMBER OF CASES	TOTAL HOURS WORKED IN 2025	** ABSENTEEISM RATE (RALAM)
Cernavoda NPP	0	3,130,324	0
Pitesti NFP	0	593,788	0
HQ	0	381,480	0
FPCU Feldioara	0	318,507	0
Energonuclear	0	88,781	0
NuclearelectricaServ	1	1,290,139	2.64
<b>Total</b>	<b>1</b>	<b>5,803,019</b>	<b>0.59</b>
2024			
UNIT	NUMBER OF CASES	TOTAL HOURS WORKED IN 2024	** ABSENTEEISM RATE (RALAM)
Cernavoda NPP	2	3,104,123	3.16
Pitesti NFP	0	696,926	0
HQ	0	372,330	0
FPCU Feldioara	0	331,125	0
Energonuclear	0	80,500	0
NuclearelectricaServ	0	1,052,602	0
<b>Total</b>	<b>2</b>	<b>5,637,606</b>	<b>1.74</b>



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The number of hours worked has been taken from the records of each SNN Group entity and aggregated.

**\*\* The rate of absenteeism related to days lost due to occupational accidents and diseases (RALAM) was determined in accordance with the Internal Instruction SSM – 00 – 04.01, according to the formula:  $RALAM = NZLPA \times 25,000 / \text{number of days} - \text{number of SNN employees}$**

Where:

**NZLPA** is the Number of Working Days Lost by Injured and is determined by the formula:  $NZLPA = NZLPA_{ITM} + NZLPA_{Inv} + NZLPA_{deces}$

**NZLPA<sub>ITM</sub>** – represents the number of working days of temporary incapacity for work, as a result of the work accident, according to the period of incapacity for work registered in the FIAM;

**NZLPA<sub>Inv</sub>** – is the sum of the time not worked by the disabled injured person, plus the proportion of work capacity reduction calculated by the product of: the percentage (%) of reduced capacity for work on the certificate of invalidity, the percentage (%) of time from resumption of work after invalidity to the end of the year x 250;

**NZLPA<sub>deces</sub>** – is the time from the fatal event to the end of the year determined by the product of: % time in calendar days from the date of the fatal event to the end of the year x 250.

Note:

The indicators are determined over the cumulative period from the beginning of the calendar year over the reporting period;

For **NZLPA<sub>Inv</sub>** and **NZLPA<sub>deces</sub>** the data corresponding to each disabled injured person and fatal injured person in the reporting period are calculated and included in the calculation formula;

This indicator is based on the assumption that a full – time employee works 2,000 hours per year;

### Lost time incident rate (LTIR) in 2020 – 2024

	2024	2025
Lost time incident rate (LTIR)		
Number of accidents x 200,000/total number of hours worked during the year	0.07	0.03

The training of SNN Group employees on occupational health and safety is delivered out in accordance with the provisions of Law no. 319/2006 at employment, in the workplace, regularly and additionally, whenever necessary, based on programmes and topics determined for the different workplaces and trades. All Company employees mandatorily attend the mandatory OHS trainings at employment, and in the workplace, regularly and additionally, whenever necessary. Specialist staff with specific OHS responsibilities are trained under training programmes dedicated to their responsibilities as members of the Work Safety services organised in each SNN Group unit.

### Number of employees trained on occupational health and safety

	2024	2025
OHS specialists and employees with specific OHS responsibilities (number of persons)	108	103
Staff trained of general matters, including OHS topics (no. of persons)	3,349 <sup>17</sup>	3,683

<sup>17</sup> The difference in the total number of employees (3,349 instead of 3,364) is due to the non-inclusion in the training of staff on mandate contract (15 persons – 6 at the SNN level: Headquarters, Cernavoda NPP and Pitesti NFP, and 3 employees for each of the 3 subsidiaries of the SNN Group: FPCU Feldioara, EnergoNuclear and NuclearelectricaServ



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## SNN Group Working conditions



### Work-life balance metrics | S1-15



We aim to promote a work – life balance for our employees. According to the Collective Bargaining Agreement (CBA), male employees are entitled to 10 consecutive days (paternity leave), at request, upon the birth of a child. Where the father of the newborn has obtained the certificate of completion of the childcare training, the duration of the parental leave is increased by 5 working days. The right to increase the duration of paternity leave by the 5 days is granted for each newborn child, based on the certificate of completion of the childcare training, regardless of when it was obtained.

Employees are entitled to care leave to care for, or provide support to, a relative or a person living in the same household as the employee and is in need of care or support due to a serious medical condition, for a period of 5 working days during one calendar year (relative means son, daughter, mother, father, husband or wife of an employee).

The employee has the right to be miss work in unforeseen situations, caused by a family emergency due to an illness or accident, which make the immediate presence of the employee indispensable; however, provided that the employer is informed in advance and that the period of absence is recovered, until the employee's normal working hours are fully covered.

Work-life balance metrics, by site  
2025

ENTITY	CRITERION	FEMALE	MALE	TOTAL
Cernavoda NPP	Total number of employees	495	1,387	1,882
	Employees entitled to family-related leave	495	1,387	1,882
	Employees who have taken maternity leave, paternity leave, or parental leave	21	42	63
	Employees who have taken carers' leave	6	6	12
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	5.45%	3.46%	3.99%
	% of employees who have taken maternity leave, paternity leave, or parental leave	4.24%	3.03%	3.35%
	% of employees who have taken carers' leave	1.21%	0.43%	0.64%
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Pitesti NFP	Total number of employees	160	214	374
	Employees entitled to family-related leave	160	214	374
	Employees who have taken maternity leave, paternity leave, or parental leave	6	10	16
	Employees who have taken carers' leave	0	0	0
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	3.75%	4.67%	4.28%
	% of employees who have taken maternity leave, paternity leave, or parental leave	3.75%	4.67%	4.28%
	% of employees who have taken carers' leave	0	0	0



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Work-life balance metrics, by site 2025				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
SNN Headquarters	Total number of employees	121	121	242
	Employees entitled to family-related leave	121	121	242
	Employees who have taken maternity leave, paternity leave, or parental leave	4	3	7
	Employees who have taken carers' leave	0	0	0
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	3.31%	2.48%	2.89%
	% of employees who have taken maternity leave, paternity leave, or parental leave	3.31%	2.48%	2.89%
	% of employees who have taken carers' leave	0%	0%	0%
ENTITY	CRITERION	FEMALE	MALE	TOTAL
FPCU Feldioara	Total number of employees	109	177	286
	Employees entitled to family-related leave	109	177	286
	Employees who have taken maternity leave, paternity leave, or parental leave	10	9	19
	Employees who have taken carers' leave	0	0	0
	Percentage of employees entitled to family-related leave	100	100	100
	% of employees who have taken family-related leave	3.5%	3.15%	6.65%
	% of employees who have taken maternity leave, paternity leave, or parental leave	3.5%	3.15%	6.65%
	% of employees who have taken carers' leave	0	0	0



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Work-life balance metrics, by site 2025				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
EnergoNuclear	Total number of employees	23	45	68
	Employees entitled to family-related leave	23	45	68
	Employees who have taken maternity leave, paternity leave, or parental leave	0	1	1
	Employees who have taken carers' leave	0	0	0
	Percentage of employees entitled to family-related leave	33%	67%	100%
	% of employees who have taken family-related leave	0	1.47%	1.47%
	% of employees who have taken maternity leave, paternity leave, or parental leave	0	1.47%	1.47%
	% of employees who have taken carers' leave	0	0	0
ENTITY	CRITERION	FEMALE	MALE	TOTAL
NuclearelectricaServ	Total number of employees	434	284	718
	Employees entitled to family-related leave	434	284	718
	Employees who have taken maternity leave, paternity leave, or parental leave	6	2	8
	Employees who have taken carers' leave	1	0	1
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	1.61%	0.70%	1.25%
	% of employees who have taken maternity leave, paternity leave, or parental leave	1.38%	0.70%	1.11%
	% of employees who have taken carers' leave	0.23%	0%	0.23%



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Work-life balance metrics, by site 2025				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Group total	Total number of employees	1,342	2,228	3,570
	Employees entitled to family-related leave	1,342	2,228	3,570
	Employees who have taken maternity leave, paternity leave, or parental leave	47	67	114
	Employees who have taken carers' leave	7	6	13
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	3.94%	3.27%	3.55%
	% of employees who have taken maternity leave, paternity leave, or parental leave	3.50%	3.00%	3.19%
	% of employees who have taken carers' leave	0.52%	0.26%	0.36%

Work-life balance metrics, by site 2024				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Cernavoda NPP	Total number of employees	475	1,323	1,798
	Employees entitled to family-related leave	475	1,323	1,798
	Employees who have taken maternity leave, paternity leave, or parental leave	12	34	46
	Employees who have taken carers' leave	6	3	9
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	3.79%	2.80%	3.06%
	% of employees who have taken maternity leave, paternity leave, or parental leave	2.53%	2.57%	2.56%
	% of employees who have taken carers' leave	1.26%	0.23%	0.50%



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Work-life balance metrics, by site 2024				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Pitesti NFP	Total number of employees	157	213	370
	Employees entitled to family-related leave	157	213	370
	Employees who have taken maternity leave, paternity leave, or parental leave	6	5	11
	Employees who have taken carers' leave	0	0	0
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	3.82%	2.35%	2.97%
	% of employees who have taken maternity leave, paternity leave, or parental leave	3.82%	2.35%	2.97%
	% of employees who have taken carers' leave	0%	0%	0%
ENTITY	CRITERION	FEMALE	MALE	TOTAL
SNN Headquarters	Total number of employees	121	113	234
	Employees entitled to family-related leave	121	113	234
	Employees who have taken maternity leave, paternity leave, or parental leave	5	3	8
	Employees who have taken carers' leave	0	1	1
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	4.13%	3.54%	3.85%
	% of employees who have taken maternity leave, paternity leave, or parental leave	4.13%	2.65%	3.42%
	% of employees who have taken carers' leave	0.00%	0.88%	0.43%



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Work-life balance metrics, by site 2024				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
FPCU Feldioara	Total number of employees	114	174	288
	Employees entitled to family-related leave	114	174	288
	Employees who have taken maternity leave, paternity leave, or parental leave	11	4	15
	Employees who have taken carers' leave	0	0	0
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	9.65%	2.30%	5.21%
	% of employees who have taken maternity leave, paternity leave, or parental leave	9.65%	2.30%	5.21%
	% of employees who have taken carers' leave	0.00%	0.00%	0.00%
ENTITY	CRITERION	FEMALE	MALE	TOTAL
EnergoNuclear	Total number of employees	13	30	43
	Employees entitled to family-related leave	13	30	43
	Employees who have taken maternity leave, paternity leave, or parental leave	0	1	1
	Employees who have taken carers' leave	0	0	0
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	0%	3.33%	2.33%
	% of employees who have taken maternity leave, paternity leave, or parental leave	0%	3.33%	2.33%
	% of employees who have taken carers' leave	0%	0%	0%



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Work-life balance metrics, by site 2024				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
NuclearelectricaServ	Total number of employees	398	233	631
	Employees entitled to family-related leave	398	233	631
	Employees who have taken maternity leave, paternity leave, or parental leave	5	8	13
	Employees who have taken carers' leave	0	0	0
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	1.26%	3.43%	2.06%
	% of employees who have taken maternity leave, paternity leave, or parental leave	1.26%	3.43%	2.06%
	% of employees who have taken carers' leave	0%	0%	0%
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Group total	Total number of employees	1,278	2,086	3,364
	Employees entitled to family-related leave	1,278	2,086	3,364
	Employees who have taken maternity leave, paternity leave, or parental leave	39	55	94
	Employees who have taken carers' leave	6	4	10
	Percentage of employees entitled to family-related leave	100%	100%	100%
	% of employees who have taken family-related leave	3.52%	2.83%	3.09%
	% of employees who have taken maternity leave, paternity leave, or parental leave	3.05%	2.64%	2.79%
	% of employees who have taken carers' leave	0.47%	0.19%	0.30%



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## SNN Group Equal opportunities and treatment for all



Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own equal opportunities and treatment for all, and effectiveness of those actions | S1-4



As of 2021, SNN has been keeping a Report Card in each company, calculating and documenting the key human resources metrics, including a diversity metric.

The strategic lines of action for maintaining the diversity metric within the assumed targets are:

- Involvement of the Company in early training of the young generation of specialists in the nuclear energy industry, both under the above strategic directions and by providing support for upgrading of laboratories and school workshops, internship programmes, scholarships, traineeships, dual school, mentoring, study facilities, school/university competitions or participation in theme projects.
- Optimising the management of internal communication by conducting research programmes on the workers' satisfaction with the organisational culture and climate, and organising theme social actions to adapt behaviours to the mission, vision and values of the SNN Group.
- Diversity tracking and monitoring is part of a broader strategy to improve representation within the organisation;
- Collaboration with accredited national universities and other educational institutions has been improved and streamlined, with newly – set objectives for internships in the Company, in order to hire directly from a pool of graduates of university or relevant vocational education

The Human Resources Policy also provides a series of actions and initiatives in the areas of staff training and development, equal pay and diversity and inclusion.

The SNN Group supports employee participation in conferences, advanced trainings and professional certification programmes. Identification of the training needs and development opportunities is an integral part of the employee performance appraisal process and the Company encourages its employees to make recommendations that can support their development.

Some of the basic trainings have been digitalised and are available for individual use by employees, in electronic format, on the computer. At the same time, SNN is in the process of digitalising most of its human resources activities with the aid of a specialised external firm, with the aim of increasing efficiency, traceability, and access to information. The contract-set time-limit for implementation of all the activities is the end of 2026.

As regards fair pay, the SNN Group aims to:

- Devise clear criteria for bonuses and benefits, so that all people have fair access thereto.
- Monitor and report on progress on equal pay within the company.

To support this commitment, the Group is implementing a number of measures and initiatives, including:

- Awareness-raising and training programmes: All employees participate in regular training sessions on diversity, inclusion and discrimination prevention. These include both theoretical aspects and case studies and practical scenarios.
- Diversity objectives: The Group monitors its progress on diversity and inclusion by analysing the recruitment, promotion and retention data.



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- Fair recruitment: Selection processes are carried out in a transparent, objective and non-discriminatory manner, ensuring that all persons have equal employment opportunities.

Moreover, the Group is committed to a zero-tolerance policy regarding discrimination and harassment; any incident of discrimination or harassment is investigated and sanctioned in accordance with the internal regulations. Additionally, SNN Group companies are committed to providing support for employees with disabilities, ensuring the reasonable accommodations required for those who need workplace adjustments.

## SNN Group Equal opportunities and treatment for all



Targets related to the management of material negative impacts, positive impact promotion, and management of material risks and opportunities in relation to equal treatment for all | S1-5



To ensure equal treatment for SNN Group employees we ensure that a range of best practices are in place in relation to employees with disabilities, employee education and training, fair remuneration for all employees and promoting a diverse working environment. Thus the following targets were set:

Metric – People with Disabilities, Training, Remuneration and Diversity	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
SNN targets (Cernavoda NPP, Pitesti NFP and SNN Headquarters)						
People with disabilities	Number	8	8	10	10	10
Training – employee training participation ratio	Percentage	99%	99%	99%	99%	99%
Remuneration (pay gap and total remuneration)	Percentage	5.12%	5.12%	5.12%	5.12%	5.12%
Gender equality and equal pay for work of equal value	Percentage	100%	100%	100%	100%	100%
Breakdown of remuneration between women and men by employee categories	Percentage	6.69%	6%	5%	5%	4%
Diversity (gender, age bands, etc.) – retention rate of young people under the age 30 in the organization, percentage of women employed, retention rate of people with disabilities	Percentage	81%	82%	82%	82%	82%



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Metric – People with Disabilities, Training, Remuneration and Diversity	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Targets for FPCU Feldioara						
People with disabilities	Number	1	1	2	2	2
Training – employee training participation ratio	Percentage	62%	95%	95%	95%	95%
Remuneration (pay gap and total remuneration)	Percentage	5.9%	5.9%	5.9%	5.9%	5.9%
Gender equality and equal pay for work of equal value	Percentage	100%	100%	100%	100%	100%
Breakdown of remuneration between women and men by employee categories	Percentage	11.2%	11%	10.9%	10.9%	10.9%
Diversity (gender, age bands, etc.) – retention rate of young people under the age 30 in the organization, percentage of women employed, retention rate of people with disabilities	Percentage	87.9%	87.9%	88%	89%	89%

Metric – People with Disabilities, Training, Remuneration and Diversity	MU	Base year 2023*	Target for 2030	Target for 2035
Targets for EnergoNuclear				
People with disabilities	Number	0	2	2
Training – employee training participation ratio	Percentage	100%	100%	100%
Remuneration (pay gap and total remuneration)	Percentage	0	0	0
Gender equality and equal pay for work of equal value	Percentage	100%	100%	100%
Breakdown of remuneration between women and men by employee categories	Percentage	0	0	0
Diversity (gender, age bands, etc.) – retention rate of young people under the age 30 in the organization, percentage of women employed, retention rate of people with disabilities	Percentage	100%	100%	100%

Metric – People with Disabilities, Training, Remuneration and Diversity	MU	Base year 2023*	Target for 2030	Target for 2035
NuclearelectricaServ Targets				
People with disabilities	Number	0	0	0
Training – employee training participation ratio	Percentage	100%	100%	100%
Remuneration (pay gap and total remuneration)	Percentage	0	0	0
Gender equality and equal pay for work of equal value	Percentage	100%	100%	100%
Breakdown of remuneration between women and men by employee categories	Percentage	0	0	0
Diversity (gender, age bands, etc.) – retention rate of young people under the age 30 in the organization, percentage of women employed, retention rate of people with disabilities	Percentage	100%	100%	100%



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As regards people with disabilities, according to the legal provisions, a minimum of 10% of the available budget is allocated for the purchase, on a partnership basis, of products and / or services made by the own activity of people with disabilities employed in authorised protected units. We also aim that no disabled person should be dismissed. The SNN Group respects the right to work of people with disabilities and will create optimal conditions for their professional development.

SNN Group employees also have increased access to training programmes, with 99% of the employees with an Individual Employment Agreement active at the reference date participating in at least one internal, on-the-job or external professional training program.

The remuneration policies observes the principle of gender equality and equal pay for work of equal value. There are no differences in pay between men and women within job categories, as the pay scale is uniform. The pay gap results from the number of employees (male/female) and is calculated as the ratio between the average basic salaries of female employees and the average basic salaries of male employees.

Diversity is calculated as a composite indicator<sup>18</sup> consisting of: 70% retention rate of young people under 30 years of age in the organisation; 20% percentage of women in employment and 10% retention rate of people with disabilities.

<sup>18</sup> This metric is only applicable to the entities Cernavoda NPP, Pitesti NFP and SNN Headquarters.

The targets were set by the 4 companies based on available input data in 2024, taking into account the development scenarios of the investment projects and correlating this data with the development schedule. Based on the existing human resources policies listed in chapters S1-1 chapters, and on the metrics tracked in the materiality assessment or the ESRS guidelines, specific criteria were considered for setting these targets. In setting the targets, no stakeholders other than the experts in the departments responsible for these areas were included. It is important to note that these targets may undergo changes depending on the medium and long-term developments. To ensure the accuracy and relevance of the set targets, these will be continuously monitored and adjusted against the evolving dynamics of the projects and the economic and technological context.

The targets were set in 2024 and there have been no previous performance issues. Thereafter, targets will be monitored and reported annually. At this time, the responsibilities for target monitoring are allocated to the human resources departments in each company. In the future, employee involvement on target monitoring through recurring internal reporting may be considered. Any changes will be disclosed and reported accordingly. The targets have been empirically set giving due regard to performance, results over time, procedures, strategy, codes and the statutory obligations and considering that the employee rights are respected and that there are no serious cases of their violation in the SNN Group.

All targets have been building on the assumption that they would have no negative impact on the own workforce and

based on current data, procedures, codes and the strategy, but also that the workforce metrics related to workforce diversity and pay equity would increase. Targets have been set taking into account the statutory provisions of the Romanian labour laws regarding pay, equity, and envisaged also minimisation of the negative impacts and compliance with the of the UN Global Compact principles.

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### Diversity metrics | S1-9















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The diversity metric calculated and updated periodically using the Report Cards is reported on the executive and administrative management, as part of the management's commitment to enhance diversity. This is a composite metric that includes measurements of the share of employees under the age of 30 years employed and



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retained in the Company, the ratio between the male and female employees, and the retention rate of employees with disabilities. This composite metric is reviewed on a monthly basis and the average monthly values, consolidated at Company level, usually fall into the excellence range.

The **composite diversity metric** determined for SNN (Headquarters, Cernavoda NPP and Pitesti NFP) has constantly evolved in 2025, and reports a value of 86.01% (2024 – 84.24%).















### Gender distribution by number and percentage, for senior management

The senior management consists of the management roles (Branch Manager/Line Manager) with employment agreement, as these are defined in the Company's Job Classification. The number of senior management positions does not include the director offices sitting in the Board of Directors, and the Executive Officers with contracts of mandate.

31.12.2025				
ENTITY	CRITERION	FEMALE	MALE	Total
Cernavoda NPP	Number of senior management employees	5	38	43
	Percentage of senior management employees	11.63%	88.37%	100%
Pitesti NFP	Number of senior management employees	4	2	6
	Percentage of senior management employees	67%	33%	100%
SNN Headquarters	Number of senior management employees	13	22	35
	Percentage of senior management employees	37%	63%	100%
FPCU Feldioara	Number of senior management employees	3	1	4
	Percentage of senior management employees	75%	25%	100%
EnergoNuclear	Number of senior management employees	4	9	13
	Percentage of senior management employees	30%	70%	100%
NuclearelectricaServ	Number of senior management employees	5	7	12
	Percentage of senior management employees	42%	58%	100%



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31.12.2024				
ENTITY	CRITERION	FEMALE	MALE	Total
Cernavoda NPP	Number of senior management employees	4	40	44
	Percentage of senior management employees	9.09%	90.91%	100%
Pitesti NFP	Number of senior management employees	3	2	5
	Percentage of senior management employees	60%	40%	100%
SNN Headquarters	Number of senior management employees	13	23	36
	Percentage of senior management employees	36.11%	63.89%	100%
FPCU Feldioara	Number of senior management employees	9	13	22
	Percentage of senior management employees	40.90%	59.10%	100%
EnergoNuclear	Number of senior management employees	3	4	7
	Percentage of senior management employees	42.86%	57.14%	100%
Nuclearelectrica Serv	Number of senior management employees	5	4	9
	Percentage of senior management employees	56%	44%	100%



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Employee breakdown by age bands

31.12..2025					
ENTITY	CRITERION	< 30 YEARS	30 - 50 YEARS	> 50 YEARS	TOTAL
Cernavoda NPP	Numbers of employees by age bands	319	969	594	1,882
Pitesti NFP		6	247	121	374
SNN Headquarters		9	138	95	242
FPCU Feldioara		46	182	58	286
EnergONuclear		2	35	31	68
Nuclearelectrica Serv		90	320	308	718
<b>Total</b>		<b>472</b>	<b>1,891</b>	<b>1,207</b>	<b>3,570</b>
31.12.2024					
ENTITY	CRITERION	< 30 YEARS	30 - 50 YEARS	> 50 YEARS	TOTAL
Cernavoda NPP	Numbers of employees by age bands	294	958	546	1,798
Pitesti NFP		7	249	114	370
SNN Headquarters		10	140	84	234
FPCU Feldioara		46	195	47	288
EnergONuclear		2	21	20	43
Nuclearelectrica Serv		59	280	292	631
<b>Total</b>		<b>418</b>	<b>1,843</b>	<b>1,103</b>	<b>3,364</b>

The figures shown are based on data from the human resources system, as at 31 December 2025, and 31 December 2024, respectively.

## SNN Group Equal opportunities and treatment for all



### People with disabilities | S1-12



We support inclusion of people with disabilities; nevertheless, most SNN Group workplaces have attached specific health requirements for our employees, as confirmed according to the applicable legal requirements. The staff health state is certified at employment and regularly afterwards by the specialised occupational medicine service available in the Company, so that, the state of health of the staff is appropriate for the professional risk factors identified for each position in the SNN Group. Thus, the data on people with disabilities are compiled and reported by the specialised occupational medicine service.

The persons with disabilities employed by the SNN Group in years 2020 – 2025 followed a constant trend.



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Number and percentage of employees with disabilities, by site

2025	FEMALE	MALE	TOTAL
<b>SNN Group (4 companies)</b>			
Number of employees with disabilities	1	10	11
Total percentage of employees with disabilities	0.30%		
2024	FEMALE	MALE	TOTAL
<b>SNN Group (4 companies)</b>			
Number of employees with disabilities	2	10	12
Total percentage of employees with disabilities	0.35%		

2025				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Cernavoda NPP	Number of employees with disabilities	1	7	8
	Total percentage of employees with disabilities			0.43%
Pitesti NFP	Number of employees with disabilities	0	1	1
	Total percentage of employees with disabilities			0.27%
SNN Headquarters	Number of employees with disabilities	0	1	1
	Total percentage of employees with disabilities			0.41%
FPCU Feldioara	Number of employees with disabilities	0	1	1
	Total percentage of employees with disabilities			0.3%
ErgoNuclear	Number of employees with disabilities	0	0	0
	Total percentage of employees with disabilities			0%
NuclearelectricaServ	Number of employees with disabilities	0	0	0
	Total percentage of employees with disabilities			0%
2024				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Cernavoda NPP	Number of employees with disabilities	1	8	9
	Total percentage of employees with disabilities			0.50%
Pitesti NFP	Number of employees with disabilities	0	0	0
	Total percentage of employees with disabilities			0.0%
SNN Headquarters	Number of employees with disabilities	1	1	2
	Total percentage of employees with disabilities			0.85%
FPCU Feldioara	Number of employees with disabilities	0	1	1
	Total percentage of employees with disabilities			0.30%
ErgoNuclear	Number of employees with disabilities	0	0	0
	Total percentage of employees with disabilities			0%
Nuclearelectrica Serv	Number of employees with disabilities	0	0	0
	Total percentage of employees with disabilities			0%



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## SNN Group Equal opportunities and treatment for all



### Training and skills development metrics | S1-13



The SNN Group pays particular attention to the systematic training of its staff so that they can carry out their duties at the excellence standards of the nuclear energy industry.

The Company is involved and constantly invests in ensuring the quality of employees through training and continuous training and by promoting meritocracy, as a component of the motivation system documented and implemented in each SNN Group company.

The nuclear energy industry particularly places on the staff selected for positions important to nuclear safety and management, coordination and supervision positions, in the processes carried out in the Company, requirements at the highest standards of professional competence and ethics in the specific field of activity, giving priority to the nuclear safety considerations before any other considerations.

### SNN (Cernavoda NPP, Pitesti NFP and SNN Headquarters)

The significant achievements of 2025 in terms of the workforce-related performance processes are summarised below:

- A comprehensive succession planning process was devised and put in place at corporate level. The overall process includes identification, selection and development of applicants for the future leadership roles;
- Successor development is planned and monitored under the newly devised individual development plans (IDPs). These IDPs include elements, such as: short and long – term objectives, learning objectives and activities to support them, training needs/activities, as well as experiential roles/activities needed for development. These IDPs were devised further to the industry benchmarking;
- The corporate positions critical to the Company's success have been identified and included in the succession planning process;
- The specific procedures describing the succession planning process have been updated and harmonised between the SNN headquarters and the two branches (Cernavoda NPP and Pitesti NFP);
- A Report Card at the level of Headquarters, Cernavoda NPP and Pitesti NFP was developed and implemented in 2021, and was maintained and documented also in 2025. This includes the main Human Resources (HR) metrics to ensure good visibility of the performance of the HR processes across the organisation.

All employees benefit of access to professional training, under internal and external training programmes, courses, seminars at national or international level. The Company prepares the Annual Training and Improvement Plan.

The Personnel Training and Authorisation Department has the role of training the Cernavoda NPP staff for continuous improvement of individual performance and for elimination of any errors likely to have an adverse effect on nuclear safety and the population. The annual training offer is available to all Company employees on the Intranet page. At company level all employees who have an active individual employment agreement participate in the performance appraisal process.

### FPCU Feldioara

In the case of FPCU Feldioara the following professional training courses and trainings took place under the procedures S – MR – 10 Professional training plan and S – MR – 01 Internal qualification of the operating and laboratory staff, which were attended in 2025:

- Professional training courses: – 61 people (31 women and 30 men)
- Workplace qualification – 5 people (2 women and 3 men)
- AQ vocational training – 150 people (64 women and 86 men)

Overall, for the subsidiary FPCU Feldioara, an average of 16.27 hours of training/employee were reported in 2025.



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### Nuclearelectrica Serv

The entity pays particular attention to the systematic training of its staff so that they can carry out their duties at the excellence standards of the nuclear energy industry. The company is involved and constantly invests in ensuring the quality of its employees through continuous training and education.

All employees benefit of access to professional training, under Cernavoda NPP internal and external training programmes, courses, seminars at national level. The Company prepares the Annual Professional Training Plan.

In 2025, contracted professional trainings were delivered to 30 people (16 women and 14 men).

### Periodic appraisal metrics

	2024			2025		
SNN Group (4 companies)	FEMALE	MALE	TOTAL	FEMALE	MALE	TOTAL
Total number of employees	1,278	2,086	3,364	1,342	2,228	3,570
Participation in period appraisal	1,248	2,030	3,278	1,279	2,165	3,442
% of employees who participated in periodic appraisal	97.65%	97.31%	97.44%	95.30%	97.17%	96.41%
Participation in professional training	892	1,833	2,725	1,249	2,088	3,336
% of employees who participated in professional training	70%	88%	81%	93.07%	93.72%	93.45%



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2025				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Cernavoda NPP	Total number of employees	495	1,387	1,882
	Participation in period appraisal	467	1,373	1,840
	% of employees who participated in periodic appraisal	94.34%	99%	97.77%
	Participation in professional training	432	1,274	1,706
	% of employees who participated in professional training	87.27%	91.85%	90.65%
Pitesti NFP	Total number of employees	160	214	374
	Participation in period appraisal	155	206	361
	% of employees who participated in periodic appraisal	96.88%	96.26%	96.52
	Participation in professional training	160	213	373
	% of employees who participated in professional training	100%	99.53	99.73%
SNN Headquarters	Total number of employees	121	121	242
	Participation in period appraisal	113	112	225
	% of employees who participated in periodic appraisal	93.39	92.56	92.98
	Participation in professional training	116	115	231
	% of employees who participated in professional training	95.87%	95.04%	95.45%
FPCU Feldioara	Total number of employees	109	177	286
	Participation in period appraisal	102	175	275
	% of employees who participated in periodic appraisal	93.5%	98.8%	96.1%
	Participation in professional training	104	177	280
	% of employees who participated in professional training	95.4%	100%	97.9%
EnergoNuclear	Total number of employees	23	45	68
	Participation in period appraisal	23	45	68
	% of employees who participated in periodic appraisal	33%	67%	100%
	Participation in professional training	23	45	68
	% of employees who participated in professional training	33%	67%	100%
Nuclearelectrica Serv	Total number of employees	434	284	718
	Participation in period appraisal	419	254	673
	% of employees who participated in periodic appraisal	96%	89%	94%
	Participation in professional training	414	264	678
	% of employees who participated in professional training	95%	93%	94%



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Training and development indicators, by site

2024				
ENTITY	CRITERION	FEMALE	MALE	TOTAL
Cernavoda NPP	Total number of employees	475	1,323	1,798
	Participation in period appraisal	458	1,286	1,744
	% of employees who participated in periodic appraisal	96.42%	97.20%	97.00%
	Participation in professional training	463	1,310	1,773
	% of employees who participated in professional training	97.47%	99.02%	98.61%
Pitesti NFP	Total number of employees	157	213	370
	Participation in period appraisal	154	207	361
	% of employees who participated in periodic appraisal	98.09%	97.18%	97.57%
	Participation in professional training	155	213	368
	% of employees who participated in professional training	98.73%	100%	99.46%
SNN Headquarters	Total number of employees	121	113	234
	Participation in period appraisal	112	105	217
	% of employees who participated in periodic appraisal	92.56%	92.92%	92.74%
	Participation in professional training	113	106	219
	% of employees who participated in professional training	93.39%	93.81%	93.59%
FPCU Feldioara	Total number of employees	114	174	288
	Participation in period appraisal	113	169	282
	% of employees who participated in periodic appraisal	39.24%	58.55%	98%
	Participation in professional training	97	118	215
	% of employees who participated in professional training	33.68%	40.97%	75%
EnergoNuclear	Total number of employees	13	30	43
	Participation in period appraisal	13	30	43
	% of employees who participated in periodic appraisal	100%	100%	100%
	Participation in professional training	13	30	43
	% of employees who participated in professional training	100%	100%	100%
Nuclearelectrica Serv	Total number of employees	398	233	631
	Participation in period appraisal	398	233	631
	% of employees who participated in periodic appraisal	100%	100%	100%
	Participation in professional training	51	56	107
	% of employees who participated in professional training	12.81%	24.03%	16.96%

During the reporting period, all eligible employees participated in the periodic appraisal or training process. Employees whose individual employment agreement was suspended for the entire period of 2025 and employees who on 31 December 2025 were in the probationary period according to the provisions of the Labour Code and the Collective Bargaining Agreement were not eligible for the evaluation process. Each employee participates in setting the annual objectives, followed by a first-half (H1) performance appraisal for the first 6 months of the year and a second-half (H2) performance appraisal for the full year. The H2 appraisal takes place in early December, requiring results to be forecasted for the remainder of the year; subsequently, in early January, an annual performance appraisal is conducted, where the actual results are reviewed, in lieu place the forecasted ones.

Regarding professional training, in Cernavoda NPP, each employee has a JRTR (Job-Related Training Requirements) profile based on their position and the specific nature of their work. In the SNN HQ, Cernavoda NPP, and Pitesti NFP entities, each employee is required to participate in at least one professional training programme and complete a minimum of 40 hours per employee per year.



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## SNN Group Equal opportunities and treatment for all



### Wage metrics (wage gap and total wage) | S1-16



The waging of the SNN Group staff is consistently regulated under the Collective Bargaining Agreement (CBA) of each Group company, which contains a hierarchy of the positions and trades in the Company. It lists the waging limits for each hierarchical level, depending on the work complexity, and the degree of technicality and professional competence specific to the positions in the Company's organisation chart.

Salary negotiation is sensitive to the requirements contained in the Job Description, which is enclosed to the CBA, and considers a comparative evaluation with the average income earned in similar activities at national and international level; thus, a salary the amount of which is determined in accordance with the limits of the Hierarchy

List of Positions, included in the CBA, is obtained. The gender pay gap, defined as the difference in average pay between female and male employees, and calculated according to ESRS S1 AR98 (b), is **7.3%**. The gender pay gap is influenced by the distribution of employees across specific roles and hierarchical levels within the nuclear sector, where technical and operational positions with a high degree of complexity and responsibility are predominantly held by men.

The ratio of the total annual pay for the highest paid employee and the median total annual pay for all employees, calculated in accordance with ESRS S1 AR101 (c) is **4.54%**.

SNN Group (excluding NuclearelectricaServ*)	2024	2025
Gender pay gap (per total employees)	7.4%	7.3%
Pay breakdown between women and man for the management level	15.4%	13.3%
Pay breakdown between women and man for the execution level	4.7%	8.3%
Ratio between total annual compensation (per total)	5.88%	4.54%

\*The calculations presented in the table contain data from SNN (including Cernavoda NPP, Pitesti NFP, SNN Headquarters), FPCU Feldioara & EnergoNuclear. The final percentage represents an average between the percentages calculated for SNN, FPCU Feldioara and EnergoNuclear.

Within NuclearelectricaServ such a percentage cannot be calculated because the results would not be correct. The employed staff is paid according to the rate related to the services contract for which they perform the activities, without any gender-based differences.

However, in terms of function, there can be two people of the same sex, working on different contracts, with different gross salaries (the difference being generated by the contract rate).

In order to consolidate the percentages presented in the above table, an average has been determined between the 3 companies, using the percentages resulting from the calculations of the pay differences, as described above.

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### Incidents, grievances and serious human rights problems and incidents | S1-17



The Organisation and Functioning Regulation lists the Company's organisational entities that process the grievances filed by the individuals or communities affected by the business activities of SNN Group



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companies. These grievances are registered and addressed in accordance with the applicable legal provisions.

An operational procedure has been put in place in SNN for cases of harassment, establishing the persons designated to receive and evaluate complaints made by employees or third parties in relation to the SNN employees and the stages of investigation, indicating the measures that may be taken.

In 2025, the SNN Group did not register any cases with a major impact on human rights related to the current business or the decisions adopted. Receipt and settlement of any complaints, minimisation of the instances of violation of human rights and adoption of settlement measures are regulated under the Ethics Committee's Regulation or the procedure for preventing and combating sexual harassment and moral harassment in the workplace, as applicable. All incidents have been addressed.

In 2025, the SNN Group has not received any grievances from employees regarding occupational safety and health, discrimination or human rights, via the Whistleblower platform. After having investigated the 3 cases (shown in the table below), one grievance was closed, and the other two were settled by ordered measures.

SNN Group is affiliated to the UN Global Compact. In 2025, there were no cases of non-compliance with the UN Guiding Principles on Business and Human Rights, ILO principles or OECD guidelines.

2025							
Criterion	Cernavoda NPP	Pitesti NFP	SNN Headquarters	FPCU Feldioara	EnergoNuclear	Nuclearelectrica Serv	Total
Number of human rights violation incidents	0	0	0	0	0	0	0
Number of employee grievances concerning human rights	1	0	2	0	0	0	3
Number of employee grievances concerning OHS	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>
2024							
Criterion	Cernavoda NPP	Pitesti NFP	SNN Headquarters	FPCU Feldioara	EnergoNuclear	Nuclearelectrica Serv	Total
Number of human rights violation incidents	0	0	0	0	0	0	0
Number of employee grievances concerning human rights	0	0	3	0	0	0	3
Number of employee grievances concerning OHS	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>

SNN employees can report concerns through the whistleblower channel, with the necessary protection ensured as per the information in the sub-chapters "Processes to address the negative impacts and the channels provided to own workforce to voice their concerns" (S1-3), as well as via any other channel, by mail or email, if they opt for an alternative channel. Employees can also contact the ethics advisors through the channels: mail, telephone or direct meetings with them, being available in each SNN Group entity.

There have been no fines, penalties or compensation awarded for damages caused by the incidents and reasons for the grievances described above.



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## SNN Group Other work-related rights



**Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to other work-related rights, and effectiveness of those actions**  
| S1-4



### SNN

In 2025, the SNN entities, **HQ, Cernavoda NPP and Pitesti NFP** have undertaken the following actions to address digital security risks:

- Regular delivery of Security Awareness Trainings to the staff of the entities.
- Regular sample-based checks to see that the security tool agents (FireEye, TrendMicro, etc.) are in place on workstations and that the Active Directory level security policies are enforced.
- Review of the Group policies in the Active Directory of the entities, as provided in each chapter. The Code of Business Ethics and Conduct was updated in 2025.
- implementing best practices in the use of removable devices for users to limit unauthorised use of removable devices.
- Logging/auditing the file servers and pushing logs to the SIEM solution.
- Regular reviews of the file server permissions.
- implementing a data loss prevention solution.
- Use of secure communication protocols
- Making regular backups that are saved in a secure network area
- Continuous identification, assessment and mitigation of IT&C infrastructure vulnerabilities
- Periodic audit, once a year, with an external provider of the level of cyber security
- Conducting regular cyber security incident response exercises
- Configuration management to avoid errors and cybersecurity gaps.
- Ensuring a rigorous cyber risk management process
- Analysis and consumption of threat intelligence in cyber security processes

According to the risk management process, the Headquarters, Cernavoda NPP and Pitesti NFP establish plans of measures to mitigate risks.

### Cernavoda NPP

SNN Group, through Cernavoda NPP owns accommodation facilities for its own staff and for the companies providing services for Cernavoda NPP. These accommodation spaces are:

- Work and emergency housing
- Temporary accommodation spaces (hotel-like).

Allocation of work and emergency housing available from Cernavoda NPP's asset portfolio serves as a staff retention strategy; however, provision of this benefit is not obligation for the Company. Distribution of the work and emergency housing takes place based on the principles of transparency and open access, in accordance with the Housing Allocation Regulation. This allocation is managed by a joint committee comprising the Cernavoda NPP management and the trade unions; the Regulation relies on the role, importance and criticality of the staff in attaining the primary objectives of Cernavoda NPP. Distribution of the temporary accommodation (hotel-like lodging) is managed by the Support Services Department (DSS Chief Engineer and SAOE Head), subject to availability, and is based on approved accommodation requests.

### FPCU Feldioara

The Company has implemented a strict personal data management policy. In 2024 we implemented a prevention system at the FPCU Feldioara Subsidiary where



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Fortinet equipment was installed. FPCU Feldioara earmarked funds for implementation of Fortigate solutions, and allocates funds every year for the TEN software, antivirus licenses and software licenses. In 2025, there were no other specific actions carried out.

### EnergONuclear

EnergONuclear ensures that its practices do not produce or contribute to significant negative impacts on its own workforce by implementing and strictly complying with the company – wide GDPR policy and internal regulations.

Within **EnergONuclear S.A.**, the IT and Document Management Service has implemented a cybersecurity strategy for network protection, as follows:

- Setting up the Data Center (DC – Data Center) which hosts the core infrastructure of the network (servers, communication equipment, etc.) and securing access to this enclosure through an access control system by cards and key;
- Servers and PC workstations are protected by privileged access restrictions. Servers have protected and limited administrator accounts and end-users do not have any rights to the PCs within the EnergONuclear IT network;
- Perimeter (border) protection is realised through Cisco routers. Intrusion protection services, firewalls, Anti – Virus, Anti BOT and extended web filtering are performed at all network entry and exit points. User access to malicious and many non-business related sites is restricted by filtering applications and URLs;
- Email infiltration is mitigated by using advanced email protection solutions. Every incoming email is filtered

and malicious attachments or links that might otherwise cause a security event are blocked;

- All devices attached to the network are protected by applications designed for these activities. These applications provide protection against known and unknown malware, attacks without attached files as well as zero – day attacks on software vulnerabilities that have not yet been patched;
- For internal file sharing, partitions are used to which access is controlled through the rights assigned to the accounts defined in Active Directory, these being accessible only to authorised users, with viewing, reading or writing / editing rights being assigned by the IT team, with management approval;
- For sharing outside the organisation, a file sharing system is used. Access to the platform is realised “over Internet” through the HTTPS protocol (ensuring encryption for secure communication). The authentication in the platform is performed through the accounts defined in the Active Directory for this purpose and with the prior approval of the Company's Management and regulatory bodies. The platform is hosted on EnergONuclear servers (not on third party servers), being managed exclusively by the IT team.

In the Income and Expenditure Budget (IEB) 2025 (regarding the LNTP stage) a series of purchases of equipment, software, licenses, etc. have been foreseen in order to improve and increase the level of cyber security of the entire IT infrastructure of EnergONuclear.

**NuclearelectricaServ** permanently uses authorised software and an appropriate antivirus system. At the entity level, there are permanent contracts for digital protection, both from a physical point of view (specialised personnel) and appropriate antivirus programmes.



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## SNN Group Other work-related rights



Targets related to the management of material negative impacts, positive impact promotion, and management of material risks and opportunities concerning other work-related rights | S1-5



The *commitment to respect the human rights* stipulates zero tolerance for undermining, and/or violation of, human rights, regardless of the form of such violations. Thus, the following targets have been set at Group level:

Ratio	MU	Base year 2023*	Target for 2030	Target for 2035	...	Target by 2050
Incidents, grievances and severe impact on human rights	No.	0	0	0	0	0
Number of human rights violation incidents	No.	0	0	0	0	0
Number of employee grievances concerning human rights	No.	0	0	0	0	0

The targets have been set for each Group company based on the input data available for 2024. Based on the existing human resources policies listed in chapters S1-1 chapters, and on the metrics tracked in the materiality assessment or the ESRS guidelines, specific criteria were considered for setting these targets. In setting the targets, no stakeholders other than the experts in the departments responsible for

these areas were included. It is important to note that these targets may undergo changes depending on the medium and long-term developments. To ensure the accuracy and relevance of the set targets, these will be continuously monitored and adjusted against the evolving dynamics of the projects and the economic and technological context.

The targets were set in 2024 and there have been no previous performance issues. The responsibilities for monitoring the targets currently lie significantly with the HR staff. In the future, employee involvement on target monitoring through recurring internal reporting may be considered. As the targets have been set in 2024, their level of relevance, comparability can be inferred over time, over the coming years. Any changes will be disclosed and reported accordingly. The targets have been empirically set giving due regard to performance, results over time, procedures, strategy, codes and the statutory obligations and considering that the employee rights are respected and that there are no serious cases of their violation in the SNN Group.

All targets have been building on the assumption that they would have no negative impact on the own workforce and based on current data, procedures, codes and the strategy, but also that the workforce metrics related to workforce diversity and pay equity would increase. Targets have been set taking into account the statutory provisions of the Romanian labour laws regarding pay, equity, and envisaged also minimisation of the negative impacts and compliance with the of the UN Global Compact principles.



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# SNN Group ESRS S2 WORKERS IN THE VALUE CHAIN



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SNN's workers in the value chain can be grouped in two categories: (i) workers in the internal value chain, which include employees of the subsidiaries FPCU Feldioara, Nuclearelectrica Serv and EnergoNuclear, and (ii) workers in the external value chain, namely employees of companies with which SNN has commercial relations, both upstream and downstream.

SNN has, in its value chain, employees who work for entities in the supply chain that are involved in production of technical-grade uranium concentrate (U3O), which is the essential raw material in production of the nuclear fuel (UO2) further used to generate nuclear energy. Uranium is used in the form of nuclear fuel, which is obtained as follows: uranium concentrate is processed by the **SNN subsidiary – Fabrica de Prelucrare a Concentratelor de Uraniu (FPCU) Feldioara**, in order to obtain sinterisable uranium dioxide powder (UO<sub>2</sub>), namely the nuclear fuel required for the manufacture of CANDU 6 type nuclear fuel bundles, produced at **Fabrica de Combustibil Nuclear Pitesti (Pitesti Nuclear Fuel Plant) – a subsidiary of SNN**; these bundles are used at Units 1 and 2 of the nuclear powerplant operated by the **SNN subsidiary Centrala Nuclearo-Electrica (Nuclear Power Plant)** in order to obtain the electricity sold by SNN.

The employees in the **internal value chain** are not covered by this analysis, as the information on them is included in the data consolidated at Group level and presented in section S1 – Own workforce. The information presented below only concerns the employees of entities that are not consolidated at Group level.

**The downstream workers** in the value chain are not included in this analysis, as the energy produced by SNN is mainly traded on the centralised markets managed by

OPCOM and RCE. In this context, the commercial relationships are standardised and regulated, and the applicable contractual model does not give the Company the possibility to exercise any influence or control over the operational practices and the impacts generated at the level of the “client” organisations. Therefore, in accordance with the principle of control and ability to influence the impacts in the value chain, SNN does not have the possibility to directly manage or mitigate the potential impacts on downstream entities' workers.

The most significant category of workers in the value chain, who could be affected by the impacts of the SNN Group of Companies are the employees of service providers and any contractors carrying out activities on one of the group's sites. Being a Company majority State shareholding, SNN follows the legal public procurement procedures, which include the Agreements signed by each supplier and which become part of the contract, initially being part of the Tender Book. All documents required to be completed by the potential tenderers are made public at the time when the procurement is commenced, by through publication in the Electronic Public Procurement System – SEAP.

In 2025, the impacts, risks and opportunities related to workers in the value chain were reassessed against those identified in 2024. In the previous year, the impacts, risks and/or opportunities identified for “S2 – Workers in the value chain” were jointly addressed under several sub-topics or sub-sub-topics. For 2025, impacts, risks and opportunities were reassessed at an individual sub-sub-topic level, for each matter. The impacts, risks and opportunities previously identified have been reworded where necessary for clarity, but there were also impacts, risks or opportunities newly identified on certain



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aspects. The analysis and reassessment identified relevant and material impacts only on the area of health and safety of the workers in the value chain.

The material impacts concerning the workers in the value chain, as identified in 2025, are presented below.

Workers in the value chain			
Topic	Sub-topic	Sub-sub-topic	Impact(s)
Workers in the value chain	Working conditions	Health and safety	<b>Current, negative impact:</b> Impact of nuclear incidents on the health of workers in the value chain. <i>(Applicable at Group level)</i>
Workers in the value chain	Working conditions	Health and safety	<b>Current, negative impact:</b> Impact of accidents at work on the health of workers in the value chain. <i>(Applicable at Group level)</i>

Risks and opportunities related to the impacts identified in 2025.

Topic	Sub-topic	Sub-sub topic	Risk/Opportunity
Workers in the value chain	Working conditions	Health and safety	<p><b>Risks:</b> harm to SNN's reputation and possible sanctions where incidents related to the health and safety of the workers in the value chain, working on the SNN Group's sites, occur <i>(Applicable at Group level)</i></p> <p><b>Opportunity:</b> Maintaining adequate emergency training to all its staff and keeping in place a sound safety culture <i>(Applicable at Group level)</i></p>

The opportunity identified as material arises from the impacts that the SNN Group may have on the workers in the value chain who render works or services on one of the Group's sites. Thus, with this opportunity, the intention is to invest some resources in maintaining and developing a strong safety culture to avoid any type of accident or incident involving the workers in the value chain. Thus, the opportunity allows for sustainable economic development and at the same time ensures that any negative financial effects or reputational harm are avoided.

## SNN Group Workers in the value chain



### Policies concerning the workers in the value chain | S2-1



#### Cernavoda NPP, Pitesti NFP and SNN Headquarters

La nivelul entităților din cadrul SNN, respectiv CNE The SNN Group, namely Cernavoda NPP, Pitesti NFP & Headquarters, has devised provisions and requirements for the workers in the value chain through the Code of Business Ethics and Conduct, the Supplier Guidelines, the Compliance Guidelines and the Ethics and Compliance Programme. Moreover, the Business Partner Integrity Guidelines (revised in 2024), summarises and centralises the working principles applicable to the Company's suppliers' employees. Additionally, each procurement contract includes clauses on Child Labour and other forms of human trafficking.

SNN's Code of Ethics and Business Conduct, together with the Business Partner Integrity Guidelines, sets out matters to which all business partners of the SNN Group of Companies, including their employees, must adhere. SNN Group subsidiaries have a separate Code of Ethics



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applicable to their suppliers and employees. The way of contracting with the partners in the value chain ensures compliance with principles such as staff training capabilities, fair remuneration, safety and health conditions at work, but cannot intervene on issues related to the administration and internal policies or practices of the partners (such as gender equality at the level of employees or management or employment and inclusion of persons with disabilities, etc.)

In the value chain of the SNN Group there are also suppliers from other countries supplying raw materials and equipment. These suppliers in turn have formal commitments to respect human rights, apply occupational health and safety (OHS) rules, and implement relevant ethics and compliance policies and standards, which are listed on their websites. In addition, there is a process of auditing the management systems at supplier level, where the Rules of the National Commission for Nuclear Activities Control (CNCAN) NMC – 06 need to be applied in the entities public procurement process, including outside Romania. Moreover, through its internal specialised structures, the 3 entities regularly conducts compliance audits of the suppliers with significant exposure to the quality, environmental, and occupational health and safety risks.

The occupational safety and health risk assessments carried out within SNN entities also cover the workplaces where the contractors' personnel render the work. Under the Occupational Health and Safety Agreement concluded between the Company and each contractor, contractors are required to prepare, when so requested by the

Beneficiary, an occupational health and safety plan for the activities carried out in the spaces belonging to the Beneficiary, based on the assessed risks of injury or occupational illness, which includes also appropriate protective measures. This Plan shall be submitted for clearance by the Occupational Health and Safety Structure of the Beneficiary, prior to commencement of the activities, and is to be available in the premises of the SNN Group unit to be examined at request by Occupational Health and Safety Officers, Labour Inspectors and Health Inspectors.

The SNN Group is regulated at national level by the legal provisions of public procurement, thus, based on the ability to intervene on the practices of the partners in the value chain, the need and possibility of implementing a specific policy that deals with the value chain workers and the impacts, risks and opportunities identified as significant in this area will be analysed in the following years.

The SNN Group has implemented a Human Rights Commitment that also extends to its collaborators, responsibly addressing human rights in every interaction as part of its vision, principles, strategic direction, and corporate culture. At the same time, the Group is concerned about ensuring that all collaborators and partners firmly share the same values and commitment to human rights.

#### **FPCU Feldioara**

FPCU Feldioara has developed procedures related to working with suppliers' employees and compliance with

sustainability requirements such as (S – AP – 03) Drafting of Products Procurement Award Documentation and S – AP – 04 Drafting of Procurement Award Documentation. These are intended to respect social and environmental criteria for the selection of suppliers. They declare on their own responsibility that the relevant environmental, social and labour relations obligations have been taken into account in the elaboration of the offer.

When signing contracts with suppliers, an Agreement on occupational health and safety measures for the supply of products or services is also signed, which includes the rules to be observed on the FPCU Feldioara platform in order to prevent accidents. Also, for the employees of the service providers, an OHS training is carried out at the entrance on the site, and a collective training sheet is elaborated.

#### **EnergONuclear**















For the safety and health coordination services (for the EnergONuclear Cernavoda office) there is a policy for the employees of the service providers, whereby an OHS training is performed upon entering the site, a collective training sheet is prepared for them, and the handover of the site to the provider is done only after the latter has prepared and approved its own Safety and Health Plan, which has been harmonised with the Safety and Health Plan of EnergONuclear.

#### **NuclearelectricaServ**

NuclearelectricaServ operates and provides services exclusively on the Cernavoda NPP site; therefore, it complies with all the aforementioned Occupational Health



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and Safety (OHS) provisions regarding the workers in the value chain.

The implementation of these policies is the responsibility of each worker and workplace supervisor, in their respective area of responsibility, thereby ensuring compliance with the Occupational Health and Safety (OHS) requirements.

In 2025, SNN established a Corporate Safety Board to strengthen the Group's commitment to the safety of all company employees and contractor personnel operating across the SNN Group entities, as well as the necessity to achieve and maintain high performance levels in the essential areas of industrial security and occupational health (SNN Decision no. 122/2025).

- The Code of Ethics and Business Conduct (adopted in 2018 and updated in 2025),
  - the Supplier Guidelines (adopted in 2024),
  - the Compliance Guidelines (adopted in 2020) and
  - the Ethics and Compliance Programme (adopted in 2024)
- are available to the general public on the SNN Group website.

The Ethics and Integrity Service ensures that the Code of Ethics and Business Conduct, and Compliance Guidelines, and Ethics and Compliance Programme, and the Business Partner Integrity Guidelines are regularly updated and are available on the SNN Group website.

In particular, the Compliance Guide and the Business

Partner Integrity Guide are communicated to business partners for formal acknowledgment by their management and employees involved in performance of contracts with the SNN entities, specifically when an assessment identifies a medium integrity risk level, as outlined in the ESRS G1-3 section.

Separately, for contractor staff, a bilingual (RO-EN) training session titled "Preventing and Combating Sexual Harassment" is provided, and had already been attended by 767 participants.


















As a Company majority State shareholding, the SNN Group is required to follow the legal public procurement procedures, which include the Agreements signed by each

supplier and which become part of the contract, initially being part of the Tender Book. All documents required to be completed by the potential tenderers are made public at the time when the procurement is commenced, by through publication in the Electronic Public Procurement System. Additionally, suppliers also sign a Declaration on own responsibility that they comply with the applicable legislation, including respect for the human rights provided in the UN Universal Declaration of Human Rights, as well as other environmental and social matters.

The SNN Group pays a particular attention to the requirements of contractors who provide specialised personnel for a wide range of services and works, and supply products for the processes carried out in SNN Group. Thus, the Tender Book requirements set out conditions related to occupational health and safety, and for the critical areas and activities, these are subject to audits in accordance with the requirements of the occupational health and safety management system according to SR ISO 45001:2018.

For all contractors performing activities in SNN Group, an Agreement on occupational health and safety and emergencies is signed, as annex to the Business Contract, as uniquely regulated across at SNN Group level by SNN Decision no. 512/14.12.2022).

This agreement contains occupational health and safety responsibilities each party to the contract, as well as responsibilities in case events occur in the work system. The provisions of the Sectorial Procurement Law 99/2016 require equal opportunities and equal treatment for any

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possible supplier, a law that the SNN Group must apply and respect.

Moreover, the Occupational Health and Safety Agreement concluded between the Company and each contract regulates the access of the contractors' staff to the premises of the Beneficiary, as well as the condition that the activities pertaining to the services/works covered by the Business Contract only commence after the signing of the Occupational Health and Safety and Emergencies Agreement, delivery of training on the undertaking's and/or SNN Group units' specific activities, assessment of the occupational health and safety risks to the contractors' workers, and determination of the prevention and protection measures, in general, and completion of the work formalities imposed under the occupational health and safety management system put in place in the SNN Group units.


The Physical Protection and Classified Information Department and the Cyber Security Threat Management Department ensure that this collaboration takes place and that its results are integrated into the SNN Group's strategic approach.

To date, no specific workers in the value chain have been identified as being particularly vulnerable and/or marginalised, over whom the SNN Group exerts a specific influence or impact.

## SNN Group Workers in the value chain

**Processes to address the negative impacts and the channels provided to workforce in the value chain to voice their concerns | S2-3**

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Workers in the value chain can be exposed to negative impacts when they work in an environment of concern, subject to hazard risks; therefore, the occupational health and safety provisions are an essential part of preventing the harmful effects, rather than remediation itself. SNN Group's priority is to minimise and prevent as much as possible any negative effects on its contractors and their subcontractors, particularly the accidents at work. As such, the SNN Group has put in place a number of procedures to ensure, or cooperate to address the negative impacts on the workers in the value chain, and has provided channels for them to voice their concerns for these to be further addressed.















These are SNN Group's formal means by which all stakeholders, including workers in the value chain, can

make their concerns and needs known directly through SNN Group's complaint resolution mechanisms. The approach to issues raised and details of processes put in place to address the negative impacts, as well as the channels whereby concerns can be raised, are outlined in **ESRS G1**, under the "Whistleblower protection" section.

SNN Group ensures that suppliers are aware of SNN Group procedures or legal requirements and that their employees can use SNN Group channels as a way of expressing their concerns or needs and having them addressed. The SNN's ethics and integrity structures makes sure that this collaboration takes place and that its results are included in the strategic approach adopted to these matters in the SNN Group. The effectiveness of these channels is confirmed by the complete resolution of the complaints.

With a view to preventing negative impacts, before remedial measures are needed, the SNN Group units delivery training to the workers of their contractors and subcontractors on the specific activities of the SNN Group unit, the risks to their health and safety, as well as the prevention and protection measures and activities established, and the introduction of the work area where the contracted activities are to be carried out. Also, access and organisation work formalities, including fire permit, are provided according to the internal procedures of the unit concerned.

These are made available to contractors for compliance by the own workforce and the subcontractors' workers with the internal procedures regulating the access to SNN

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Group premises and to the workplace in the premises, as well as for actions in emergencies that could occur while contractors' workers are present inside the unit.

The SNN Group and its collaborators in the value chain are required to inform each other immediately of any event suffered by the workers of their own workers in the premises belonging to the SNN Group units or outside thereof, if it occurred in connection with the activities performed under the contract/framework agreement which is covered by the OHS and Emergencies Agreement.

## SNN Group Workers in the value chain



**Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action | S2-4**



Should of a work-related event/accident occur, both parties must take the following steps immediately:

- maintain the state of affairs that led to the occurrence of the event, unless it is necessary to rescue personnel;
- to inform each other, to inform the legal investigation bodies, if necessary, about the work event/accident,

with the necessary data according to the legal provisions;

Hazardous incidents occurring in the facilities of the SNN Group Unit are investigated and recorded by the SNN Group Unit where these occurred. Where the investigation of these hazardous concludes that these occurred as a result of the breach of the occupational health and safety and fire safety requirements by the contractors' workers, the Contractor shall bear the consequences. Regarding the Occupational Health and Safety (OHS) matters along the value chain applied to workers with whom SNN Group companies have contractual relationships, the safety and security standards are identical to those applied to the SNN Group employees. Thus, occupational risks are assessed for all workplaces in the SNN Group units where they work, before commencement of any work. Under the OHS and Emergencies Agreement, Providers are also required to prepare an Occupational Health and Safety plan for the activities performed in spaces belonging to the SNN Group, based on the assessed accident at work or occupational illness, that would include appropriate protective measures; this Plan is cleared by the Occupational Health and Safety Structure of the Unit before any activities is commenced. The duly executed OHS Agreement contains obligations to observe the SNN Group's legal requirements and the internal procedures concerning the protection measures specific to the works and services performed, including in terms of work at height, work in confined spaces, work in an environment with ionising radiation, work with substances of concern/mixtures, work with electrical installations, work under the supervision of ISCIR (the State Inspection for the



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Control of Boilers, Pressure Vessels and Hoisting Equipment), as well as work under other particular conditions regulated under the specific legal provisions or the regulations applicable in the SNN Group units.

Last but not least, according to the SNN Group's Occupational Health and Safety (OHS) management system, a centralised procedure (SSM-00-04) is documented, detailing the operational coordination process for prevention and protection. This includes elements regarding the material impacts on the workers in the value chain, as well as the tracking of significant opportunities related to contractor staff, and the effectiveness of these actions. This is achieved through a structured analysis of four key OHS elements: Management Commitment and Employee Involvement; Workplace Analysis; Hazard Prevention and Control; and Health and Safety Training. This analysis is conducted within the Corporate Safety Board, a body established at the SNN Group level to strengthen the Group's commitment to the safety of all company employees and contractor staff operating across the SNN Group entities, as well as the necessity to achieve and maintain high performance levels in the essential areas of industrial security and occupational health.

During the reporting period, there have been no specific actions regarding value chain workers and the impact of the Company on them. Being regulated at the national level by the legal provisions of public procurement, the SNN Group has little ability to intervene on the practices of partners in the value chain. For this reason, some specific policies or actions on value chain workers and the impact on them could not be implemented at the moment. The SNN Group

put in place procedure to, and performs audits to directly, check the performance of the suppliers which it works with.

In 2025, there were no occupational accidents resulting in temporary disability, permanent disability, or fatalities among contractor staff. The rate of work-related injuries remains at 0, based on 1,770,609 hours worked by contractor employees.

In 2025, no instances of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises Involving Affected Communities, involving also the affected communities, have been reported in the SNN Group operations or its upstream and downstream value chain.

The resources needed for prevention-based management of a potential material impact are included in the procurement budgets for 2025, including the budget for audits.

## SNN Group Workers in the value chain



**Targets related to the management of material negative impacts, positive impact promotion, and management of material risks and opportunities for value chain workers | S2-5**



Contractors and collaborators who have signed contracts and service agreements with the SNN Group shall respect the right to adequate wages, social protection rules, providing professional training, support for work – life balance in accordance with the legislation in force for all workers. These regulations are provided in the data sheet and the technical proposal, which contains mandatory information on the evaluation factors of the collaboration offers.

Thus the targets currently set at SNN Group level for the entities working with contractors are to maintain 100% of



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the rules imposed by contracts to respect the right to adequate wages, social protection rules, providing professional training, support for work – life balance in accordance with the legislation in force for all workers. Given the SNN Group's position in relation to value chain partners, no targets have yet been set for managing impacts, risks and opportunities.

No instances of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises Involving Affected Communities, involving also the affected communities, have been reported in the SNN Group operations or its upstream and downstream value chain.



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# SNN Group

## ESRS S3

# AFFECTED COMMUNITIES



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## SNN Group Affected communities



### Material impacts, risks and opportunities and their interaction with strategy and business model | IRO-1; SBM-3



The interests and views of the affected communities also stems from additional consultations with the communities where the SNN Group operates, and their analysis has taken place as part of the SNN Group's materiality assessment process. The affected communities-related impacts, risks and opportunities are identified and assessed as part of the dual materiality assessment, in an internal workshop, as well as by consulting other literature sources.

The types of communities relevant to the SNN Group are:

- communities living or working around the sites of the companies belonging to the SNN Group, or more remote communities potentially affected by the activities performed on these SNN Group sites.
- Communities in the areas related to SNN Group's

supply chain, or other indigenous populations outside of Romania were not considered to be significantly impacted by SNN Group's operations. Romania has no indigenous population.<sup>2</sup>

In 2025, the impacts, risks and opportunities related to consumers and end-users were reassessed against those identified in 2024. The impacts, risks and opportunities identified in the previous year were rewarded and specifically reclassified at an individual sub-sub-topic level for each matter. The impacts, risks and opportunities previously identified have been reworded where necessary for clarity, but there were also impacts, risks or opportunities newly identified on certain aspects. The analysis and reassessment identified relevant and material impacts only on the sub-sub-topics related to Freedom of assembly and Impacts on human rights defenders. Any issue related to the impact on soil, water or sanitation that may indirectly affect communities has been dealt with in the chapters related to indicators E2 – Pollution and E5 – Resource use and circular economy.

The results of this process are presented in the table below.

Affected communities			
Topic	Sub-topic	Sub-sub-topic	Impact(s)
Affected communities	Communities' civil and political rights	Freedom of assembly	<b>Current, positive impact:</b> Meeting and dialog with representatives of the affected communities. <i>(Applicable for Cernavoda NPP, Pitesti NFP and SNN Headquarters)</i>
Affected communities	The civil and political rights of the communities in which we operate	Impacts on human rights defenders	<b>Current, positive impact:</b> Supporting non-governmental organisations in improving social and educational conditions. <i>(Applicable for SNN Headquarters).</i>

The impacts identified are applicable to the following entities within SNN: Cernavoda NPP, Pitesti NFP and SNN Headquarters. The actions and measures outlined in the Affected Communities Policy, along with further details regarding the collaboration and interaction with local community members, are presented in the following subchapters. As regards the subsidiaries FPCU Feldioara, EnergoNuclear and NuclearelectricaServ, no impacts, risks or opportunities applicable on these topics have been identified.

No material risks or opportunities have been identified in the FY2025 double materiality assessment. At this time, there are no communities in which the SNN Group companies have an impact with specific characteristics, contexts or certain activities that may be exposed to a higher risk of harm.



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## SNN Group Affected communities



### Affected communities-related policies | S3-1



An Affected Communities Policy has been developed internally at Group level to define a clear and detailed framework for managing the impact of nuclear projects on the local communities. This policy ensures compliance with the ESRS (European Sustainability Reporting Standards) and CSRD (Corporate Sustainability Reporting Directive) requirements, as well as alignment with the recommendations of the International Atomic Energy Agency (IAEA) and the international best practices. The fundamental principles of this policy are:

- **Transparency and Public Consultation** – Maintaining continuous and accessible communication for all stakeholders through regular meetings, public consultations and online platforms.
- **Impact Management** – Application of proactive measures to reduce the negative effects on the environment and communities, following the international best practices.
- **Economic and Social Support** – Implementation of

- local economic development programmes, support for entrepreneurship and vocational training.
- **Monitoring and Accountability** – Establishment of clear mechanisms for reporting and ongoing impact assessment through independent audits and annual sustainability reports.

The Affected Communities Policy applies to all SNN Group projects and operations, including:

- All employees and subcontractors involved in the Group's activities.
- Communities located in the areas of influence of nuclear power plants and the related infrastructure.
- Local, regional and central authorities cooperating with the SNN Group companies in core activities and project implementation.
- Non-governmental organisations, advocacy groups

#### Responsibility structure

- Sustainability Director – Provision of oversight for the overall implementation.
- Project Managers – Integration of the requirements in the operation activities.

The following owners and responsibilities have been defined for the implementation of this policy:

#### Sustainability Director

- Coordinates and monitors policy implementation at strategic level.
- Submits an annual Community Impact Report to the Board of Directors.
- Ensures compliance with the international and national regulations.

#### Project Managers

- Integrate the policy requirements into operational plans.
- Make sure that the field activities comply with the set standards.

#### Community Relations Department

- Organise public consultations and feedback mechanisms.

#### Health and Safety Department

- Monitors the impact on public health and develop prevention programmes.

#### Financial Department

- Allocates and monitors the budgets of the community programmes.
- Manages the financial compensation mechanisms for the affected persons.

The Local Communities Policy pays particular attention to the stakeholders that may be affected by the operations and activities of the SNN Group companies. Thus, the policy aims to develop several initiatives designed to support affected or disadvantaged people and local businesses, and to invest in health and public safety or in education, while developing a local workforce.

The policy provides for several forms of community consultation, including:

- Organisation of **at least two annual public consultations** in the affected regions, to provide information and to collect feedback from citizens.
- Communication channels:
  - Dedicated online platform for questions and feedback. ■



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- Local/regional community relations offices opened in each area of potential impact.
- Direct meetings with community leaders and local NGOs.
- Implementation of a **mechanism to communicate concerns**, to ensure free expression of opinions and to provide feedback.
- Dissemination of relevant environmental data resulting from monitoring activities through media channels
- Ensuring organisation of information and training “Open Doors Days” activities intended specifically to age groups and professional interests
- Issue of regular publications on topics of interest for the community such as “InfoPlus for Neighbours”

No instances of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises Involving Affected Communities, involving also the affected communities, have been reported in the SNN Group operations or its upstream and downstream value chain. For conflict situations, the Affected Communities Policy considers designated neutral facilitators for conflict resolution.

The SNN Group has implemented a Human Rights Commitment that also extends to communities, applying engagement and investment strategies based on clearly established procedures and principles. Community development revolves around three primary investment pillars: education, healthcare, and environmental protection.

## SNN Group Affected communities



### Procese de colaborare cu comunitățile afectate cu privire la impacturi | S3-2

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Besides the community consultation forms described above, the SNN Group applies a materiality assessment process, whereby the communities in which the SNN Group operates are consulted on sustainability matters associated with, and relevant to, SNN Group's business. Each dialog partner thus assesses the level of the positive or negative impact, and the nature of this environmental, social or governance impact related to the Company's business, this being also how the SNN Group assesses the effectiveness of its collaboration with the affected communities. The frequency of these consultations is every 3 years or more often, if necessary. In 2025, these consultations took place during as part of the double materiality assessment in October.

As to the community communication, Cernavoda NPP distributes the Infoplus magazine for neighbours, in all relevant local locations, and sends out monthly or daily news not only to CNCAN, but also to the municipalities of Cernavoda, Medgidia, Fetesti, Saligny, Seimeni, Rasova, Aliman and other municipalities. This information includes data about the environmental impact, doses to population as a result of operation of Cernavoda NPP's U1 and U2, radioactivity of groundwater on site or the electrical power at the power plant's terminals.

In order to support the potentially disadvantaged local communities, the SNN Group has also implemented a dual and vocational education programme (in Cernavoda and Fetesti) to train the future generations of specialists. Under these internships, the SNN Group makes sure that the representatives of local community are given the opportunity to develop and then pursue a career in a company that operates in their community.

The SNN Group also organises a series of public consultation sessions with the environmental authorities, as part of the procedures pursued to obtain the regulatory acts from them. Therefore, consultations with the local community take place in particular for the environmental agreements and permits, in accordance with the legal regulations in force, and their frequency is laid down in the procedures pursued to obtain the regulatory acts.

The environmental agreement is issued by the competent environmental protection authority, and sets out the conditions to be met for development or modification of a project. The (integrated) environmental permit is the



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administrative act issued by the competent environmental protection authority, which grants the right to operate all or part of an installation. Assessment of the environmental impact of certain public and private projects, as well as the procedure followed to obtain/renew the licenses require performance of public consultations, in accordance with the transposed EU Directives.

In the environmental protection licensing process, for implementation of projects with environmental impact, public consultation is a mandatory requirement under the provisions of:

- Government Emergency Ordinance no. 195/2005 on environmental protection, as subsequently amended and supplemented
- Law no. 292/2018 on the assessment of certain public and private projects' impact on the environment, as subsequently amended and supplemented
- Order no. 1798/2007 approving the procedure for the issue of the environmental permit, as subsequently amended and supplemented.

Specifically, for a comprehensive approach to community consultation, Cernavoda NPP supplements its community communication and consultation programme by setting up the Community Information and Consultation Board (CICB). The Board is formed citizens of the town of Cernavoda and the communes of Saligny and Seimeni, representatives of non-governmental organisations and members of different institutions that are interested in matters related to the nuclear power plant. The Community Information and Consultation Board (CICB) supports Cernavoda NPP in identifying and effectively

responding to the questions, concerns and interests of the community, in relation to Cernavoda NPP's activity. The Board pursues the following purposes:

- to identify the problems, concerns and interests of the community;
- to provide Cernavoda NPP with consultancy, advice and opinions on the community expectations in all areas/fields of interest related to the activity of Cernavoda NPP;
- to define the actions that its members consider necessary in order to be able to continuously improve the activities on site and to contribute to a better communication, respectively collaboration between Cernavoda NPP and the local community;
- to provide consultancy, advice and opinions on the communication activities of Cernavoda NPP with the community on the environmental, business and social effects of the power plant's operation on the community;
- to supply data and information for environmental assessments related to Cernavoda NPP;
- to participate in the visits made to site of Cernavoda NPP, that are relevant for the local community;
- to work together with other consultation organisations related to the nuclear industry (e.g. ROMATOM), in a way that maximises distribution of information and minimises its duplication.

The consultations, advice and opinions of the Board focus on, but are not limited to, the following topics:

- Effects of the nuclear power plant's operation on the environment, health and community safety;
- Involvement of SNN Group – Cernavoda NPP in

community development;

- Waste management activities on and off the nuclear power plant's site;
- New technologies and trends in the nuclear energy or other forms of energy that may involve the site of Cernavoda NPP.

The procedures whereby the compliance obligations are identified, as well as how communication with the environmental stakeholders is carried out are:

- Identification and application of environmental protection/occupational health and safety compliance obligations.
- Internal and external communication related to the environment.

The Head of the SNN External Communication Department ensures that this collaboration with the neighbouring communities takes place and that its results are included in the strategic approach adopted to the identified relevant matters in the SNN Group.

All consultations and public debates are attended by members of the community regardless of gender, age, education or ethnicity. All comments are considered in the decisions made in the licensing procedures. No parts of local communities potentially affected by the SNN Group's operations and activities, that may be particularly vulnerable to impact or marginalised, have been identified to date.



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## SNN Group Affected communities



Processes to address the negative impacts and the channels provided to affected communities to voice their concerns | S3-3



No material negative impacts have been identified as applicable on the local communities and relevant for the SNN Group's operations and activities, have been identified in the FY2025 double materiality assessment. Nevertheless, the SNN Group companies have put in place a number of procedures to ensure, or cooperate to address any potential negative impact on the affected communities, and has provided the affected communities with specific channels, including mechanisms to settle the complaints, for these communities to voice their concerns and for any potential problems to be addressed.

Through the Local Communities Policy, the SNN Group companies assume the responsibility to analyse and manage the impact of their activities on local communities.

Through a transparent and dialog-based approach, risks and opportunities are assessed, thereby ensuring that operations contribute only positively to sustainable development and the well-being of the communities. This assessment enables the identification of the effective measures to minimise negative impacts and maximise social and economic benefits. This policy also provides for impact studies to be carried out before commencement of any major project.

The assessments include:

- A socio and economic analysis of the potentially affected communities.
- An assessment of the public health risks.
- Access to natural resources and environmental protection.
- Mobility and local infrastructure.

The studies must be carried out according to the World Bank and IAEA standards and be reviewed by independent bodies. This information is publicly available at: Information intended to the public according to Law no. 59/2016 – Cernavoda NPP (nuclearelectrica.ro). The effectiveness of these channels is confirmed by the complete resolution of the complaints.

By interacting and collaborating with the public and the communities in which the SNN Group operates, it ensures that they are aware of and have confidence in the Group's procedures. Thus, through these procedures, they can express their concerns or needs, as well as in the procedures for solving them. All information is discussed in formal meetings held with the local community's representatives,

in the Community Information and Consultation Board (CICB). The SNN Group considers compliance with the legal requirements in order to be issued the regulatory acts from authorities. Consultations with the local community take place in particular for the environmental agreements and permits, which include also remediation conditions. The Local Communities Policy provides for an online platform for reporting community issues. Grievances must be resolved within maximum 60 days.



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## SNN Group Affected communities



**Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions**  
| S3-4



The SNN Group, together with the environmental or other local authorities, define measures to address the significant environmental impacts on affected communities, under the agreements and permits issued. These are mainly stipulated in the CNCAN, environmental and water management permits, the internal emergency plans and other policies and plans for the SNN Group sites.

The effectiveness of these actions and initiatives is disclosed in the annual environmental reports submitted to the county environmental agencies, as well as the annual sustainability report published in the SNN website.

Additionally, the Affected Communities Policy accounts for the following actions within the areas of economic compensation and support, education, training, and employment, and health and public safety.

### Compensation and economic support mechanisms

The SNN Group is committed to reducing the impact of its activities on communities. Thus, it envisages implementing initiatives aimed at enhancing the positive social and economic effects, while ensuring fair and sustainable transitions. These mechanisms include investments in local development, and programmes that contribute to the economic resilience of the communities in which the SNN Group operates.

Local development is a concern for the SNN Group under its CSR policy. SNN Group has adopted a proactive approach to identifying partners and potential beneficiaries of its CSR projects and follows a transparent decision-making process, based on clear criteria. The results of CSR campaigns are reported to stakeholders such as investors, employees, partners and collaborators.

The report on sponsorship granted and campaigns supported can be accessed at here.

### Education, training and jobs

The SNN Group supports the sustainable development of

local communities by investing in education and vocational training, and by creating employment opportunities. The group focuses on initiatives that improve access to education, develop the skills needed on the labour market, and facilitate professional integration. Through collaborations with education establishments, mentoring programmes and support for local entrepreneurship, it contributes to the economic growth and well-being of the communities in which it operates.

### Local Workforce Development – Dual Learning Programmes

#### Investments in Education

- Scholarships and grants for high-performing students from the affected communities.
- Collaboration with universities to develop technical programmes.

#### Public health and safety

##### Access to Healthcare

- Partnerships with local hospitals for subsidised treatments.

##### Information Campaigns

- Events and education sessions.
- Information materials distributed in community centers

In 2025, no serious human rights problems and incidents have been reported by the communities located in the SNN Group's operation area. The resources needed to manage a potential material impact are included in the Company's operating budgets, which include all legal measures related to nuclear safety and environmental protection, including waste management.



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## SNN Group Affected communities



**Targets related to the management of material negative impacts, positive impact promotion, and management of material risks and opportunities | S3-5**



The SNN Group companies have in place a number of codes of conduct and **management systems** where the following targets related to communities are included as performance criteria:

- Zero serious human rights incidents in the communities located in the SNN Group's operation area, under the Code of Professional Ethics and Conduct;
- Zero overruns of the environmental monitoring parameters in the communities where the SNN Group operates, under the SR EN ISO 14001:2015 environmental management system.

At Group level, the targets are to maintain zero serious human rights incidents and to increase the number of jobs available and for the people who are part of the communities in the SNN Group's area of operation, with an estimated doubling of production capacity by 2030. At this time no other specific targets have been set to address the impacts, risks or opportunities identified through the materiality assessment process. The mentioned targets and practices are maintained and the need to set targets in relation to future actions in this area will be considered.



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# SNN Group ESRS S4 CONSUMERS AND END-USERS



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## SNN Group – Consumers and end-users

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## SNN Group Consumers and end-users



Impacturile, riscurile și oportunitățile semnificative și interacțiunea acestora cu strategia și modelul de afaceri | *IRO-1; SBM-3*



As an energy producer, SNN serves a diverse range of end-users/consumers, who can be grouped based on their end-use into large industrial consumers (manufacturing industry, infrastructure, transport and utility companies), small and medium-sized enterprises (SMEs), public institutions, and residential consumers.

SNN does not supply electricity directly to the aforementioned end-users and consumers; instead, it markets energy through trading platforms (OPCOM, RCE) to electricity suppliers and traders, who subsequently distribute it to end-consumers, or to other market participants such as Distribution System Operators (DSOs), the Transmission System Operator (TSO) "Transelectrica", or other energy producers, as applicable.

### The activities of the SNN Group are not liable to impair:

- the rights to privacy, protection of their personal data, freedom of expression and non-discrimination of the consumers and/or end-users of services;
- consumers and/or end-users who rely on accurate and accessible product or service information, such as user manuals and product labels, to avoid potentially harmful use of a product or service;
- consumers and/or end-users who are particularly vulnerable to impacts on health or privacy, or to the effects of marketing and sales strategies, such as children or financially vulnerable individuals; specifically, the electricity produced and marketed does not lead to an increased risk of chronic diseases;

The consumers and end users-related impacts, risks and opportunities are identified and assessed as part of the dual materiality assessment, in an internal workshop, as well as by consulting other documented sources, or risk registers, as established for each risk area.

In 2025, the impacts, risks and opportunities related to consumers and end-users were reassessed against those identified in 2024. The impacts, risks and opportunities identified in the previous year were rewarded and specifically reclassified at an individual sub-sub-topic level for each matter. To date, there have been no identified impacts, risks, or opportunities related to the sub-topics of "Consumers and end-users." The analysis and reassessment identified relevant and material impacts only on the sub-sub-topics related to "Freedom of expression", "Access to (quality) information", and "Access to products and services".

The impacts identified in 2025 are summarized in the table below and are addressed in the following sections.

Topic	Sub-topic	Sub-sub-topic	Impacts
Consumers and end-users	Information-related impacts for consumers and/or end-users	Freedom of expression	<b>Current, positive impact:</b> Accessibility to channels for the population to voice their concerns and complaints. <i>Applicable at Group level</i>
Consumers and end-users	Information-related impacts for consumers and/or end-users	Access to (quality) information	<b>Current, positive impact:</b> Public access to transparent, high-quality information regarding the Company. <i>Applicable at Group level</i>
Consumers and end-users	Social inclusion of consumers and/or end-users	Access to products and services	<b>Current, positive impact:</b> Actual, positive impact through people's access to clean energy and local development. <i>Applicable for Cernavoda NPP and SNN Headquarters</i>



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No material risks or opportunities concerning consumers and end-users have been identified in the FY2025 double materiality assessment.

Topic	Sub-topic	Sub-sub-topic	Impacts
Consumers and end-users	Social inclusion of consumers and/or end-users	Access to (quality) information	<b>Opportunity:</b> Provision of information about sustainability to end-users

## SNN Group Consumers and end-users



### Policies concerning consumers and end-users | S4-1



As a company listed on the Main Segment of the Bucharest Stock Exchange (BVB), SNN manages the Investor Relations (IR) as an integrated strategic function that combines communication, finance, capital market legislation, and corporate governance. The primary

objective of this function is to ensure the coordination and control of the information flow between the company and its investors, shareholders, and the SNN Group's stakeholders.

The major objective is to forge relationships based on trust and respect between the Company and its investors and shareholders, a reflection of the Company's fundamental values, and to provide financial information about investments, projects and energy market to the community of investors, in due time and totally transparently, so that the decision to invest or assess the Company is informed by accurate and relevant data. The goal is thus to maintain the link and serve as an interface between the Company's management and the investment and shareholder community. The purpose of SNN Investor Relations structure is to maintain and develop the trust in the company, increase the market's responsiveness to the company, and add value for shareholders and investors. The Investor Relations function ensures that the Company's shares are traded correctly by sharing key information that allows investors to make equally correct investment decisions.

Linked with SNN Group's communication strategy, the relationship with investors is guided by a symmetrical two-way system that places emphasis on feedback and, implicitly, on the constant development of the relationship with investors. It provides for:

- meetings with shareholders and investors;
- organisation of conferences, private meetings with shareholders, teleconferences and videoconferences;
- management of the Investor Relations section on the

Company's website;

- fostering access to relevant information about the Company's activities and reports;
- communication of the Company's corporate governance policies;
- communication of information with impact on the Company, shareholders and investors.

The goal is to achieve effective communication, adjusted based on the feedback received from the market, which would allow shareholders to understand and assess, relying on objective and timely information, the changes occurred in the trading patterns and the Company's development directions, all of which is information that impact the risk management strategies.

SNN sells electricity on dedicated trading markets, not directly to the public.

Through its entire CSR activity, SNN Group intends to support a sustainable business model. Social responsibility, regardless of the nature of its implementation, is an integral part of the company's vision and strategy, and SNN Group continues to support both the local community, and the initiatives that lead to innovation and continuous development, particularly those of the young people.



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## SNN Group Consumers and end-users



Impact-related collaborative processes with consumers and end-users | S4-2



## SNN Group Consumers and end-users



Processes to address the negative impacts and the channels provided to consumers and end-users to voice their concerns | S4-3



## SNN Group Consumers and end-users



Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | S4-4



On the home page of the SNN website you can find the Whistleblower section, where the communication and grievance channels are presented: reporting form, email addresses (sesizari@nuclearelectrica.ro and conformitate@nuclearelectrica.ro), or by mail to the compliance department. Access is granted to the general public without any restrictions.

Sustainability communication for the Group takes place via the Annual Report, the ESG Policy, and contract provisions designed to increase the level of ownership among collaborators and to strengthen the SNN Group's ESG principles. This is further supported by public stances, such as in media interviews.

For this topic, no negative impacts on consumers or end-users have been identified. SNN does not engage in direct business relationships with individuals or potential customers (B2C) and does not supply electricity directly to consumers and/or end-users. However, the SNN has assessed the indirect impacts it may have on the public in terms of the public's access to channels to voice their concerns and complaints. The assessment has found that the SNN Group has a positive impact on the general public by providing all individuals with unrestricted access to communication channels and grievance mechanisms.

In 2025, there were no grievances, complaints or referrals from individuals through the whistleblower channel.

Since the access to grievance and concern reporting channels is available to the general public, as described in the previous subchapters, no additional actions have been identified as necessary to date.

Regarding the general public's access to high-quality information, the SNN Group ensures that concrete and



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easily accessible information is available to everyone, including instructions regarding fraudulent announcements designed to deceive individuals attracted by the promise of easy financial gains. SNN is an energy producer listed on the Bucharest Stock Exchange (BVB ticker: SNN), and a potential acquisition of SNN shares can only be made through the market via a broker, which is entirely the investor's choice.

To protect against this type of fraudulent activity and to safeguard both the financial interests of the general public and personal data, a series of instructions have been initiated. These are intended to protect potential victims and maintain the integrity of the SNN Group, such as:

- Relying exclusively on official sources for information, specifically the Company's official website and the Bucharest Stock Exchange website. Also, for how to invest in an issuer, see the Bucharest Stock Exchange Guidelines. ■
- SNN does not use advertisements or commercials to promote investment in its shares. Any such announcement or advertisement, regardless of any association with public figures and/or potential members of the Company's management, is fraudulent;
- Exercising increased vigilance regarding suspicious calls and emails similar to these advertisements, which promise easy gains associated with SNN investments, and individuals claiming to be representatives of the Group. SNN does not send such emails, and its staff does not call any potential shareholders to explain or facilitate the investment process. Any individual posing as an SNN financial

analyst or expert in an attempt to solicit an investment on an investment platform constitutes fraudulent activity;

- Exercising increased vigilance regarding the transfer of personal data to individuals posing as SNN representatives;
- Sourcing information exclusively from reliable sources, specifically directly from the issuer;
- Reporting any such fraudulent attempts to the competent authorities;

SNN cannot facilitate direct access to energy for the population, but instead it offers clean energy through dedicated platforms. As regards the local development, the CSR is annual, and the main directions of CSR and sponsorship actions for the year 2025, in accordance with the specifics of SNN's activity and aiming to promote development and bring more value to the communities in which the Company operates, have targeted actions in the following areas and sub-areas of interest: the educational system and the healthcare system.

To maximise communication opportunities within the SNN Group's sustainability framework, the Company's core ESG initiatives and major-impact projects are frequently communicated. For example, the Tritium Removal Facility (TRF) project, with its beneficial impact on the environment, staff and the circular economy through tritium recovery, is consistently communicated as part of the SNN Group's Communication Strategy.

## SNN Group Consumers and end-users



**Targets related to the management of material negative impacts, positive impact promotion, and management of material risks and opportunities | S4-5**



In 2025, SNN achieved the maximum score of 10 for the VEKTOR 10 indicator in the assessment conducted by ARIR, confirming its adherence to the highest standards of transparency, communication, and investor relations. This result reflects full compliance with the reporting and corporate governance requirements applicable to listed issuers, as well as the implementation of best practices regarding proactive investor communication, the disclosure of relevant information, and the maintenance of a consistent and professional dialogue with the capital market.

The target is to maintain the VEKTOR 10 top score in the following years.



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# SNN Group ESRS G1 PROFESSIONAL CONDUCT



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# SNN Group – Professional Conduct

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# SNN Group Professional Conduct



Business conduct  
| *ESRS 2 GOV-1, IRO 1*



Under the Code of Professional Ethics and Conduct of the Board of Directors (BoD) of SNN, its members adhere to a set of principles concerning good governance, decision-making transparency, integrity, impartiality, honesty, loyalty and efficient management of the organisation's resources in order to attain the objectives. The Code of Professional Ethics and Conduct defines the mission, vision, values and rules of professional conduct that the SNN BoD members must respect and apply in their activity in the organisation, in accordance with the business model and the objectives of the organisation, and set out the organisational framework for transposition of these principles into procedures and policies applicable to all SNN employees. Also, the Code of Professional Ethics and Conduct sets out the guidelines and directs individual and group behaviours in the internal and external relations of SNN.

The provisions concerning management of the conflict of interests are included in the Organisation and Functioning Regulation of the Board of Directors, as well as in the Code of Professional Ethics and Conduct of the Board of Directors of SNN. The members of the Board of Directors will make decisions to the best interest of the Company and will not take part in debates or decisions that give rise to a conflict between their personal interests and those of the Company.

Each member of the Board of Directors shall make sure there is no direct or indirect conflict of interest with the Company, and, should such conflict occur, they will refrain from participating in the debates and from casting their vote on the conflicting matters, in accordance with the

legal provisions in force. The members of the Board of Directors disclose information about any relationship with a shareholder who directly or indirectly holds shares accounting for more than 5% of all voting rights. This obligation refers to any kind of relationship that could affect the member's position on the matters decided on by the Council.

Similar provisions regarding the identification, assessment and prevention of conflicts of interest, ensuring the objectivity, impartiality and fairness of the process of analysing and deciding on potential conflicts of interest and enhancing the trust of SNN Group employees are also provided in the Internal Regulations and the Codes of Conduct of the Group's companies. The SNN and EN employees are required to submit specific disclosures upon hiring, job rotation, or on an annual basis (*the Declaration of Interests in other Companies and the Declaration on Relatives or In-Laws*). At SNN, these declarations are managed through a proprietary digital platform developed for this purpose. Additionally, SNN and EN employees are required to submit a Conflict of Interest Declaration whenever a personal interest conflicts with the SNN's interests, placing them in a position to make a decision that could result into a benefit of any kind for themselves, their relatives, in-laws, or partners.

In all cases involving a conflict of interest, the employees of the SNN Group companies must abstain from any decision-making, inform their direct supervisor to ensure the necessary measures are taken for their replacement within the decision-making body, and report these matters to the company's Ethics and Integrity Department, in



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accordance with Internal Regulations and their respective Codes of Conduct.

The business conduct practices of the SNN Group companies demonstrate that SNN's values are essential for building and maintaining trust in relationships with customers, authorities, investors, and partner. The Boards of Directors of each entity within the SNN Group serve a normative and oversight role regarding professional conduct, with their members receiving regular training on all aspects of business ethics and professional behaviour.

The impacts, risks and opportunities are identified and assessed as part of the dual materiality assessment, in an internal workshop, as well as by consulting other sources. Each entity of the SNN Group maintains a Risk Register where risks related to professional conduct are entered as part of the implemented management system.

Across the SNN Group, risks and opportunities related to professional conduct are managed based on the methodology outlined in the Risk Management Procedure applicable across the SNN Group. These are entered into, and monitored through, a risk management application, maintained centrally at the SNN Group level by SNN Risk

Management Department of the HQ.

The stages/activities of the regular risk assessment process are:

- Risk identification and assessment by the specialised divisions of each entity of the SNN Group;
- Documentation of risk analysis and estimation in risk data – sheets, in the risk management IT application;
- in-application validation of the entries concerning

departmental-level risk records by their respective heads, in the case of branches/subsidiaries, by the branch and subsidiary risk officers, and subsequently by the staff of the Risk Management Department of the Headquarters;

- Definition/updating of the risk mitigation actions and measures in the software by the responsible staff, followed by monitoring by the Risk Management Service (RMS) of the HQ;
- Aggregation, processing and analysis of the risk registers and risk information;
- Issue of the Risk Management Report, its clearance by the MICS Monitoring Committee, and its final approval by the SNN Chief Executive Officer;
- Presentation of the report approved by the Risk Management Advisory Committee and information of the SNN's BoD;
- Dissemination of the Report to SCIM committee members and stakeholders.

Risk information is circulated between risk owners, heads of divisions, risk officers in branches/subsidiaries and RMS's staff as part of the risk management process, using the risk management application.

In the materiality assessment, the SNN Group has identified the following material actual impacts through which the Group exerts a positive influence on its employees, suppliers, investors, and other business partners.

Governance – Professional Conduct			
Topic	Sub-topic	Sub-sub-topic	Impact
Professional conduct	Corporate culture	n/a	Maintaining the ethical culture and integrity
Professional conduct	Whistleblowers protection	n/a	Whistleblower protection
Professional conduct	Management of relationships with suppliers including payment practices	n/a	Imposing compliance criteria on suppliers
Professional conduct	Corruption and bribery	Incidents	Enforcing rules against corruption and bribery
Professional conduct	Corruption and bribery	Prevention and detection, including training	Permanent awareness of the risks of corruption and bribery

The risks and opportunities analysed in the materiality assessment for the Governance area were insignificant.



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## SNN Group Professional Conduct



### Corporate culture and professional conduct and corporate culture-related policies | ESRS G1-1



The Code of Business Ethics and Conduct (adopted in 2018 and updated in 2025), applicable to all management members, employees, consultants, staff, and partners who carry out their activity in the SNN Group, contains the fundamental values that must be observed and advance a fair attitude, so that observance of the criteria laid down in this Code can help build a prosperous business, based on healthy, upright and transparent principles. The fundamental values that guide our activity represent universally valid principles within the company, which must be known and applied unconditionally by all employees. They have the role of supporting and promoting the vision and culture of our organisation.

- Reliability, Ambition, Engagement and Perseverance – All employees should make an active contribution to the efficiency and optimisation of the activity carried out, through efforts appropriate to the goals, in order

to attain the Company's objectives.

- Respect – A fair attitude towards co-workers, clients/customers, suppliers, investors and other people who have a direct or indirect connection with the Company's activity is essential for promoting the Company's image and business development.
- Integrity and responsibility in making decisions – All the activities carried out and the decisions taken must be in accordance with the fundamental principles represented by honesty, sincerity and transparency.
- Responsibility for ensuring protection of people, property and environment – the essential element of the activity is the observance of all the necessary requirements for ensuring nuclear safety and environmental protection.
- Teamwork – is essential for obtaining exceptional collective results. In parallel, through cooperation, the strengths and skills of each employee can be properly turned to account. Also, the active and constant support given to new colleagues ensures their rapid integration and development of a supportive and proactive work environment.
- Innovation – Encouraging individual and collective initiative in order to improve the Company's processes and to adopt new technical solutions, as well as to organise the work so as to become a driving engine for the Company's development.

As regards **SNN**, the work carried out by the Ethics Advisor and the Ethics Committee according to the RU-00-11 procedure takes into account, non-exhaustively: ensuring compliance with the ethical rules of business conduct in all company structures and at all levels, analysing the

situations presented in the complaints / reports on violations of ethical standards, policies and procedures of the organisation and forwarding them to the competent structures to resolve them, advising employees on how to deal with certain situations so that no ethical standards are violated, in terms of the duties of the ethics counsellor, organising trainings on ethics and compliance with the rules of the organisation, preparing quarterly reports on compliance with the rules of conduct, etc. At the level of each entity of the SNN Group, there is one person appointed as Ethics Advisor for each organisational level (at central level and the level of each branch and subsidiary) and a single Ethics Committee for each company of the Group. The ethics advisor's schedule for physical sessions is posted on the Company's intranet (the "For You" section), and the counsellor is available for such sessions every Thursday from the second week of the month, between 9 – 10 a.m., in pre-determined locations at each organisational level.

In 2025, 20 ethics counselling sessions were held (the statistics do not include subsequent meetings on the same topic), with a total of 24 persons (the statistics do not include any other persons who were requested to clarify certain issues raised). Outside of the designated hours when the Ethics Advisor is present at the predetermined location, the Ethics Advisor may be contacted through any other available channels: mail, telephone, in person.

The procedure on preventing and combating sexual harassment and moral harassment in the workplace within the SNN Group establishes the communication channels and the process for receiving, evaluating and resolving



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grievances/referrals and applies to all employees, as well as to those persons from the contractors and subcontractors with whom they interact directly during working hours.

The SNN Group AF – 00 – 02 procedure for reporting irregularities and whistleblower protection aims to determine the ways of reporting and treating any irregularities and it is worded so as to address issues concerning aspects of public interest, that could include also violation of the SNN Group policies and procedures, or of the applicable laws. The issues that can be qualified as irregularities (without this listing being limitative) are: non-compliance with the Code of Ethics and Conduct, non-compliance with policies and procedures, improper aspects concerning the financial statements and the relations between employees, abuses, discrimination, corruption, theft, money laundering and any inappropriate behaviour that could damage the reputation of the Company or any attempts to hide any of the above. The SNN Group, recognising the essential importance of a clear and up – to – date process for both internal reporting and protection of those who submit make such reports (whistleblowers), has adopted a procedure to provide guidance to the staff and ensure full confidentiality and protection thereof, as part of its general responsibility towards the staff, shareholders and customers. The Irregularity Reporting procedure aims to:

- encourage employees and third parties to feel confident enough raise serious issues, question them and act accordingly;
- make available to employees and third parties means of discussing and obtaining assessments of any

- measures taken as a consequence;
- make sure that employees and third parties receive an answer to their reports and that they know how to proceed when they are not happy with the measures taken;
- reassure the employees and third parties as to the fact that, when they report non-compliances that believe are real in good faith, they will be protected against any retaliation or victimisation.
- The procedure particularly determines the means of communication and the process to receive referrals on:
- improper documents and/or accounting and auditing practices that come against the international practices and applicable provisions;
- fraud, corruption of conflict of interest, as these are defined in the related policies/codes of the SNN Group on the control of fraud and corruption and conflicts of interest.

Within **FPCU Feldioara** there are several procedures adopted regarding the protection of whistleblowers and having prompt investigation procedures, such as procedure (S – SA – 01) Whistleblower Reporting and (S – SA – 05) Ethics Advisor and Ethics Advisor Regulation. In 2025, the Anti-Corruption Procedure of FPCU Feldioara, code S-SA-12, was prepared and approved in order to strengthen the framework for preventing and combating corruption.

**EnergONuclear** has in place the EnergONuclear Public Interest Whistleblower Protection and Whistleblower Reporting Procedure (P – Mg – 09, revised in April 2025)

and the EnergONuclear Anti-Corruption Policy which includes procedures for prompt, independent and objective investigation of incidents of professional misconduct, including incidents of corruption and bribery. EnergONuclear's business culture governs the behaviours in the key areas it covers, as follows:

- Ensuring the health and safety of employees and guests at all workplaces;
- Respecting human rights and labour laws and ensuring equal opportunities based on merit to all employees by valuing their competencies and rewarding them fairly;
- Fairness and honesty towards customers, suppliers and business partners, collaborating with those who have a shared commitment to ethical business practices;
- Zero tolerance for any form of bribery or corruption and a commitment to the highest standards of business ethics in all company dealings;
- The use of assets of a company in a correct way and for the established purpose;
- Respect for confidential information and professionalism in all communications;
- Avoiding conflicts of interest and paying attention to suspected fraud;
- Reporting illegal, unethical or unsafe issues;

EN has in place an anti-bribery management system in place. The Anti-Bribery Policy Statement is attached to the EN Anti-Bribery Manual in which EN management has committed to ZERO tolerance of bribery and corruption.



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At **NuclearelectricaServ** level, the Code of Ethics and Conduct, together with the mission, vision and values of the organisation, is posted on the website and permanently communicated to the employees. In this way, the Management ensures that all staff is aware of the mission it has in relation to the objectives set out in the contracts and commitments that the entity has with the SNN Group and other interested partners. It is communicated internally and externally (using the specific contact form) that there is a whistleblower in charge of collecting the data received and communicating them to the competent bodies, as appropriate. The provision is also included in the Company's internal regulation, in force, which has been brought to the attention of all NuclearelectricaServ staff. The form necessary for the communication of the situations in which this procedure is applicable can be found on the entity's website.

There is an anti-bribery policy statement implemented at NuclearelectricaServ level, it is communicated to the staff, posted on the Company's website and in visible places within the company. Sensitive functions have been identified and all aspects that can be considered to minimise risks are kept under control.

The Anti-Bribery Policy Statement is annexed to the Integrated Management Manual of the company, code MSM – NS – 01 annex 2. Also, the system procedure code PS – NS – 07 Sensitive Functions ensures a unitary framework for the process of identification and inventory of sensitive functions at the level of Nuclearelectrica SERV S.R.L., as well as for establishing control measures to reduce the risks related to them. The system procedure is

applied at the level of NuclearelectricaServ, respectively at the level of all the departments within it, for the management of the main risks related to sensitive functions.

In order to realise the anti-bribery policy and objectives, Nuclearelectrica SERV S.R.L., undertakes to:

- Ensure the anti-bribery management system is established, implemented, maintained and analysed to adequately address bribery risks;
- Ensure the necessary resources for the effective functioning of the anti-bribery management system;
- Ensure that anti-bribery management system requirements are integrated into the organisation's processes;
- Ensure that the anti-bribery management system is adequately designed;
- Communicate within the organisation and its partners the anti-bribery policy;
- Raise awareness of the organisation's staff to contribute to the effectiveness of the anti-bribery management system by emphasising the importance of compliance with its requirements;
- Promote an anti-bribery culture within the organisation;
- Create and maintain a mechanism for raising bribery concerns, encourage their reporting, and ensuring that no staff member who raise such concerns is not subject to retaliation, discrimination or disciplinary actions.

Also in 2025, the system procedures PS-NS-SMAM-05 (Implementation of Anti-Corruption and Anti-Bribery

Controls) and PS-NS-SMAM-06 (Irregularity Reporting, Raising Concerns, Investigation and Handling of Bribery Cases, and Whistleblower Protection) were revised. Furthermore, a new procedure was developed, PS-NS-SMAM-07 (Anti-Corruption Policy), to ensure a better alignment with the SNN Group-specific procedures.








The anti-corruption policy of the SNN Group constitutes a framework for setting, reviewing and achieving the anti-corruption objectives set by the company by joining 3 platforms dedicated to the field: The National Anti – Corruption Strategy, the ISO 37001 Standard and PACI (Partnering Against Corruption Initiative) of the World Economic Forum. The ISO 37001 standard regulates the anti-bribery management system and reflects the international developments in anti-corruption, specifically regarding the measures dedicated to bribery prevention. It is based on global initiatives such as the OECD Anti-Bribery Convention and the UN Convention against Corruption. Implementation of ISO 37001 standard also ensures compliance with specific anti-corruption legislation adopted by some countries with vast experience and expertise in the field (e.g., UK, USA, France, Italy, etc.).

The anti-corruption policy is aligned with applicable legislation, the Nuclear Employee Code of Conduct, the Code of Professional Ethics and Conduct of the Board of Directors, the Code of Business Ethics and Conduct and other related procedures/policies.

In 2025, the anti-corruption clauses that SNN utilises in its contracts with business partners were reviewed and



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constantly reassessed and improved.

The revised clauses highlight three key elements: (i) the existence of an objective trigger for clause activation upon the occurrence of a corrupt act; (ii) the right of SNN/the subsidiary to unilaterally terminate the contract for acts committed by contractors; and (iii) the direct legal consequence – termination of the business relationship as a response to a conduct incompatible with the integrity principles.

Lastly, the anti-corruption clause package also includes legal obligations regarding international sanctions, specifically: (i) adoption of compliance measures in accordance with the legal framework; (ii) notification by the partner regarding the imposition of any restrictive measures within the supply chain; and (iii) the right of SNN/its subsidiaries to refuse performance of contract obligations and to seek damages should any operator in the supply chain become subject to restrictive measures or international sanctions.

These anti-corruption clauses are directly linked to Measure 4.5.9 of the 2021–2025 National Anti-Corruption Strategy. This measure explicitly promotes the use of anti-corruption clauses within the business environment, providing a concrete example of wording: a clause that allows the party not at fault to unilaterally terminate the contract if the other party is convicted of corruption. Given that the SNN Group Policy includes a specific Corporate Anti-Corruption, Ethics, and Integrity Policy, which mandates the alignment of the anti-corruption procedures, it was necessary to standardise these clauses

at the subsidiary level, as well. In this regard, during 2025, the SNN Board of Directors approved the Decision no. 192/2025, mandating the compulsory implementation of the anti-corruption and international sanctions clauses across the subsidiaries: Energonuclear, Nuclearelectrica Serv, and the Uranium Concentrate Processing Plant of Feldioara.



Each SNN Group company has procedures in place for Irregularity Reporting. These procedures are aligned with the legal standards (Law no. 361/2022 on whistleblower protection), and are intended to provide support to individuals (full-time or part-time employees, contractors, suppliers, customers and other members of the public)

who believe they have encountered instances of work negligence, fraud or irregularities.

The communication channels specific to each Group entity are available to report the situations identified by petitioners. The preliminary assessments/8 investigations/audit engagements conclude with a report intended for the management. Where issues are more important, these are also reported to the Board of Directors (Audit Advisory Committee). An annual report on the activities of the Ethics and Compliance Service is prepared and submitted to the Audit Advisory Committee. Where administrative/disciplinary investigation of persons or facts is required, independent Disciplinary Committees are set up, by decisions of the CEOs of the targets entities, to review the issues identified and propose measures accordingly.

The principles of the procedure are in accordance with the principles that govern whistleblower protection:

- the principle of lawfulness, according to which authorities, public institutions, other legal entities under public law, as well as legal entities under private law are under the obligation to respect the fundamental rights and freedoms, by ensuring full respect, among other things, for the freedom of expression and information, the right to protection of personal data, the freedom to carry out a business activity, the right to a high level of consumer protection, the right to a high level of protection of human health, the right to a high level of protection of the environment, the right to effective remedy, and the right to defence;



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- the principle of responsibility, according to which the whistleblower is under the obligation to submit data or information in support of the facts reported;
- the principle of impartiality, according to which examination and settlement of reports are free of subjectivity, regardless of the beliefs and interests of the persons tasked to address them;
- the principle of good management, according to which public authorities and institutions, and other legal entities under public law are under the obligation to carry out their activity in the pursuit of the general interest, with a high degree of professionalism, and with an efficient and effective use of the resources;
- the principle of balance, according to which no person can rely on the provisions of this law in order to reduce the administrative or disciplinary sanction for a more serious infringement that is not related to that reported;
- the principle of good faith, according to which the person who had good reasons to believe that the information about the reported infringements was true at the time of reporting and that the said information fell in the scope of this law, is provided protection.

Irregularities refer mainly, but are not limited, to:

- abuse of trust
- corruption offences, offences qualified as corruption, offences directly related to corruption offences
- forgery and use of forged documents
- fraud and deception concerning investment capital
- theft and embezzlement
- blackmail

- falsification of documents and other manipulative actions concerning documents
- robbery
- market price manipulation
- insolvency offences
- coercion and threats
- “inside trading” (illegal) and market manipulation activities
- falsification of the Company’s records
- cyber crimes
- falsification, and piracy of products and brands
- abuse in relation to private or business secrets
- infringements related to accounting, financial and accounting control or internal audit
- violation of the legal provisions on public procurement and grants
- anti – competitive collusion
- money laundering
- violation of the rules concerning representation and signing of documents
- preferential or discriminatory practices or treatments in performance of the duties, violation of the provisions concerning incompatibilities and conflicts of interest
- abusive use of the Company’s material or human resources
- noncompetitive practices
- incompetence or negligence at work
- non-objective staff appraisal in the recruitment, selection, promotion, demotion and dismissal process
- violations of the procedures or determination of internal procedures in violation of the law
- any other serious infringement of the legislation or

internal rules of business ethics and conduct of the company

Given that the reporting process is generally recognised as a key tool for uncovering misconduct, it is important that staff fully understand the type of incidents they are required to report.

### Communication channels

Across the SNN Group, employees have available multiple channels to report compliance issues, allowing them to report any potential irregularities or infringements of any Company policy or law, without fear of retaliation. The staff are encouraged to report in good faith any known, potential or suspected wrongdoing or misconduct, without fear of retaliation. When they have doubts as to whether something should be reported or not, employees may seek clarification from the Ethics Advisors of each company or from the Compliance Officer of the SNN branches.

Each SNN Group entity has put in place different communication channels that can be used by employees and third parties to voice their grievances in accordance with the purpose of this procedure.

As regards **SNN**, several reporting channels are available:

- A dedicated internet portal<sup>19</sup> available on the SNN website, “Report an irregularity” section, where an



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*Irregularity Reporting Form* is available

- Intranet portal section *Integrity Whistleblower*,
- Email addresses managed by the Ethics and Integrity Service: *sesizari@nuclearelectrica.ro* and *conformitate@nuclearelectrica.ro*,
- The mailing address.

The people who report grievances can remain anonymous, but they are encouraged to identify themselves (name and contact details), particularly if an additional investigation is needed. It is preferable that all reports are made using the Irregularity Reporting Form. The number of referrals/reports received by SNN from employees or third parties over the last years is presented in the table below. All referrals have been addressed.

Reporting year	2024	2025
Number of referrals/reports	14	3

### Investigation of complaints by SNN Ethics and Integrity Service

All reports received are carefully reviewed by the Ethics and Integrity Service, subject to full secrecy and confidentiality. The Ethics and Integrity Service selects the referrals depending to the specific procedure, will review them carefully, but can only act on those that disclose instances of fraud (including improper actions and accounting and auditing practices that come against the international practices and the applicable provisions), corruption and conflicts of interest. Other referrals, which do not concern matters related to the activity of the service, are forwarded for processing to the competent structure of the Company.

The information can be provided anonymously; however, this means that the Ethics and Integrity Service cannot contact the person who file the referral/report for additional information, and this makes it more difficult to address the issue.

The person who files a referral is advised not to communicate to other people the details of the issues they reported, considering that this could have an unfavourable impact on any future investigation.

All referrals sent are treated as strictly confidential by all the units involved of the Company.

In 2025, 3 complaints concerning potential possible irregularities were received via the *Whistleblower channel*, for which the Ethics and Integrity Service or other

responsible departments of the SNN Group carried out checks, and to which they timely responded. All referrals have been addressed.

**FPCU Feldioara** has also implemented, similar to the other group entities, an Integrity Whistleblower System (<https://fpcu.ro/avertizor-de-integritate>), ISO:37001 and the Anti-Bribery Management System Manual.

In 2025, one referral concerning possible irregularities (1 – 2025; 0 – 2024) was received via the *Whistleblower* mechanism. The Legislative, Administrative Litigation, and Legal Services Department (LCJS) of FPCU Feldioara S.R.L. carried out the necessary verifications and provided the answer within the statutory time-limit. The referral was settled.

**EnergONuclear S.A.** has put in place different communication channels that can be used by employees and third parties to voice their complaints in accordance with the purpose of this procedure, as follows:

- Dedicated section on the EN website, [www.energonuclear.ro](http://www.energonuclear.ro) under the heading “Irregularity Reporting Online Form”, the format of which is included in the Annex to this Procedure P-Mg-09 Irregularity Reporting and Whistleblower Protection in EN
- E – mail address: *sesizari@energonuclear.ro*:
- Mailing address: bd. Lacul Tei, nr. 1 – 3, etaj 8, sector 2 postal code 020371 – CEI.

<sup>19</sup> <https://www.nuclearelectrica.ro/formular-online-de-semnalare-a-neregulilor/>, accesat la 19.01.2026



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În anul 2025, pe canalul susmenționat a fost transmisă o sesizare (1 – 2025; 0 – 2024), dar care nu avea ca obiect nereguli privind etică/integritate/conformitate sau fraudă/mită. Sesizarea a fost soluționată de departamentul responsabil.

In the year 2025, one referral (1 – 2025; 0 – 2024) was transmitted on the above-mentioned channel, but it was not related to ethics/integrity/compliance or fraud/bribery irregularities. The referral was settled by the responsible department.

If the public interest whistleblower requests that the reporting take place in the presence of the designated person, the designated person is obliged to draw up a record, subject to the consent of the public interest whistleblower. The designated person shall give the public interest warning officer the opportunity to verify, rectify and express his/her agreement with the minutes of the conversation by signing them. If the public interest whistleblower does not consent to the transcription or recording of the conversation, he or she is instructed to report in writing, on paper, to the designated person, or in electronic format, to a dedicated e – mail address: [sesizari@energonuclear.ro](mailto:sesizari@energonuclear.ro)

Regarding the whistleblower function, **NuclearelectricaServ** has implemented the legal requirements by including the specific legal requirements in the system procedure code PS-NS-SMAM-06 Irregularity Reporting, Raising Concerns, Investigation and Handling of Bribery Cases, and Whistleblower Protection, as revised in late 2025. Also, on the Company's website there are

notices in the section Public Information – Warnings including contact data for communication by all interested persons of potential cases, through a completed form (formatted in the request field) with the e – mail contact details of the whistleblower, being accessible both in – house, for employees and externally, for any interested person. In both 2024 and 2025, no referrals were received on the said platforms.

The procedure specifies the ways of referring, reporting, receiving, treating and investigating irregularities or violations of the law, as well as the rights and duties of the persons who submit referrals or reports. The procedure is developed to address issues concerning aspects of public interest, that could include also infringement of NuclearelectricaServ procedures, or the applicable laws.

The situations that may constitute irregularities are mainly violations of the legislation in force applicable to NuclearelectricaServ and violations of the internal regulatory framework (without this description being limitative): non-compliance with the Code of Ethics and Conduct, non-compliance with policies and procedures, misrepresentation of financial statements, improper relations between employees, conflicts of interest, abuses, discrimination, corruption, bribery, theft, embezzlement, money laundering and any inappropriate behaviour that could damage the reputation of the Company or any attempts to hide any of the above.

Annex 2 – Anti-Bribery Policy is included in the Integrated Management Manual, code MSM-NS-01, also available on the Company's website.

Also at the end of 2025, the procedure code PO-NS-04.06 Preventing and Combating Workplace Harassment and Discrimination was developed, and any possible in-scope cases can be reported through the same communication channel.

#### Protection measures

All disclosures are treated similarly to the confidential and sensitive information. When irregularities are reported, any person can assume that only the employees investigating the grievance will know their identity. The identity of the persons who makes an accusation will be confidential as long as it does not prevent or limit the investigations.

However, the identity of the person making the report will have to be disclosed where there is a legal obligation to do so:

Anonymous accusations are less credible, but can still be taken into account. In the exercise of this right, the to be considered are:

- Severity of the reported issues
- Reliability
- Possibility to obtain confirmation from independent and reliable sources

The whistleblower procedures in place in each SNN Group entity address the matters listed below, and are intended to provide protection to employees and others who report issues:

- in good faith
- who reasonably believe that there is a case of



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negligence or wrongdoing, as long as the disclosure was made to an appropriate person.

The management of each SNN Group entity do not allow any retaliation by the management against the persons who report an irregularity in good faith, including when the reported facts are not confirmed or are only partially confirmed by the investigations carried out. Also, managers have been trained to support and encourage the reporting of misconducts, and to help create an environment where employees can raise issues or ask questions without fear of retaliation.

The people who make referrals can remain anonymous, but they are encouraged to identify themselves, particularly when additional useful and timely information is needed for investigation of the reported case.

Referrals and reports are received and reviewed by the designated responsible persons, according to the Organisation and Functioning Regulation (OFR), who decide whether these can be addressed by them, or by other competent units, such as: the anti-fraud units, the Human Resources units, or the Legal Units, etc.

Both the employees and business partners and the third parties have the opportunity and are encouraged to report non-compliances or acts/facts that could lead to violation of the law and procedures or to occurrence of a noncompliance. In this sense, the Company's website has a page dedicated to whistleblowing.

The referrals received are entered in a special register. All referrals are answered in not more than 40 days.

Depending on their nature and materiality, these are reported to the SNN GEO or, as applicable, to the SNN Board of Directors, which can decide to commence an investigation. The annual report of the Ethics and Integrity Service includes a section on the referrals received and the measures taken thereon.

The employees and business partners can call the Ethics and Integrity Service during the working hours.

Ethics advisors within the each SNN Group entity have regular meetings with employees in order to provide them with advice on ethics and integrity.

The whistleblowing procedure includes specific clauses that prohibit retaliation against the employees who report non-conformities, violations of procedures or rules in good faith.

The Procedure on Irregularity Reporting and Whistleblower Protection in **FPCU Feldioara SRL (S-SA-01)** aims to provide advice to employed persons who believe that they have discovered or have sufficient and reasonable indications of the existence of situations of negligence, fraud, corruption or other irregularities and non-compliance in a professional context. The procedure covers all activities of the company, including the operations of any employee, adviser or third party acting on behalf of or in conjunction with the company.

Procedure for reporting irregularities and protection of whistleblowers in the public interest within **ErgoNuclear S.A. (P – Mg – 09)** aims to provide

counselling to persons (permanent or part – time employees, contractors, suppliers, customers, business partners and other third parties) who believe that they have discovered or have sufficient and reasonable indications of the existence of situations of negligence, fraud, corruption or other irregularities and non-compliance in a professional context. This procedure does not apply to personal grievances/complaints, that refer to terms of employment or other aspects of the employment relationship or disciplinary matters.

The procedure covers all activities of the company, including the operations of any employee, adviser or third party acting on behalf of or in conjunction with the company.

**NuclearelectricaServ** recognises the particular importance of a clear, consistent, standardised and updated internal reporting process and of the protection of whistleblowers (persons who submit referrals concerning identified nonconformities). This activity is covered by the procedure code PS-NS-SMAM-06 Irregularity Reporting, Raising Concerns, Investigation and Handling of Bribery Cases, and Whistleblower Protection, as revised at the end of 2025.

NuclearelectricaServ ensures full confidentiality and protection of whistleblowers, as part of its general responsibility towards the staff, shareholders, business partners and/or third parties.

In order to promote and strengthen integrity in performance of its activities, each entity of SNN Group



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developed an ethics and compliance programme that includes policies and principles aimed at encouraging and facilitating prevention, detection and control of the acts of corruption. The proposed measures are extensively outlined in the 2023 – 2027 Administration Plan of the Board of Directors of SNN, whereby the management promotes the concept of zero tolerance to corruption and urge the staff to act systematically to this end.

The internal regulatory procedural framework consists of the Anti – Corruption Policy (AC – 00 – 1), the Anti – Corruption Policy Compliance Module (AC – 00 – 02), the Implementation of Anti – Corruption Compliance Controls (AC – 00 – 03). Assessment of the business partners of the SNN Group in terms of the risks attached to the anti-corruption compliance system (AC – 00 – 05). In addition, the Operating Rules of the Ethics Committee and the Statutes of Ethics Advisors within each SNN Group entity (RU – 00 – 11) and Preventing and combating sexual harassment and moral harassment in the workplace within the SNN Group (AC – 00 – 06) cover other aspects related to violations of the ethics code.

Procedure AC – 00 – 02 regulates the scope and structure of the compliance function within the SNN Group from the perspective of ensuring compliance with the Anti – Corruption Policy (AC – 00 – 01). The procedure also describes the activities within the compliance function, the roles and responsibilities of the management and staff involved in the compliance function, as well as regulating the interaction of the compliance function with other departments within the company and applies to all activities of the Group and the following persons and

entities: (i) fixed – term or permanent employees, members of the Board of Directors, as well as shareholders and investors; (ii) consultants, contractors, suppliers, customers and representatives of other public institutions with which the company is in any kind of relationship or comes into contact, whose actions could lead to financial losses for the SNN Group companies or increase the reputational risk.

The procedure on the implementation of financial and non-financial anti-corruption compliance controls in the SNN Group (AC – 00 – 03) describes how the relevant financial and non-financial controls are implemented for the prevention, detection and investigation of corruption risks, in order to strengthen the internal control system, minimise the risks associated with business processes and improve the accuracy, completeness and reliability of information, documents and reports that the company produces in the course of its operational activities. The procedure also describes a matrix of inter-departmental responsibilities and duties for each type of control and specifies the role of the anti-corruption compliance function.

The Ethics and Integrity Service provides ethics advice to SNN staff and implementation of the anti-corruption policies. It submits the relevant findings, the report and the annual activity plan to the SNN Group Board of Directors (i.e. the Audit Advisory Committee). The members of the Audit Committee have relevant experience in management and implementation of the corporate governance, and at least one of them has a background in application of the accounting and financial auditing principles.

The staff of the Ethics and Integrity Service has relevant experience (over 20 years) in anti – fraud, investigations, compliance and manages the complaints that can be submitted through several channels (in writing or electronically to the dedicated e – mail addresses), including through the Integrity Whistleblower channel available on both the intranet and the SNN website, accessible to anyone who can report an irregularity.









### Nature, scope and depth of the training programmes offered or imposed by the Group in 2025.

In 2025, the Ethics and Integrity Service of SNN included in its training programme in-house trainings to introduce main components of the ethics and compliance programme, and the anti-corruption policy, on the following aspects:

1. *“Whistleblower”*, attended by a total of 1,392 employees from SNN, NPP and NFP;
2. *“Anti-Corruption Policy”*, attended by a total of 534 employees from SNN, NPP and NFP;
3. *“Anti-Corruption Training for Procurement and Sales Units”*, attended by a total of 153 employees from SNN, NPP and NFP;
4. *“Preventing and combating gender-based harassment and harassment at work”*, which was attended by a total of 534 employees of SNN, NPP and NFP;
5. *“How to React to Blackmail and Bribery Solicitations in Business Relations?”*, attended by a total of 1.729 employees from SNN, NPP and NFP;
6. *“Code of Business Ethics and Conduct”*, attended by a total of 463 employees from SNN, NPP and NFP;



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The following trainings were included in the training programme for the contractor staff: AC-00-03 “SNN-CBT Anti-Corruption Policy” – attended by one participant; AC-00-04 “Anti-Corruption Training: Responding to Blackmail and Bribery Solicitations” – attended by 8 participants; AC-00-02 “Whistleblowing – CBT” – attended by 1 participant; AC-00-01 “Identification and Prevention of Conflicts of Interest – CBT” – attended by 1 participant; and AC-00-06 “Preventing and Combating Sexual Harassment” – attended by 767 participants.

Separate training resources were provided to the SNN Board of Directors members in two stages in 2025: in May for new members, following the change in the governing body’s membership, and for all members in December. The training resources included presentations of the Board of Directors’ Code of Professional Ethics and Conduct, the document containing the SNN’s Anticorruption Policy and the Code of Business Ethics and Conduct.

Also in 2025, the matters related to identification and prevention of conflicts of interest were promoted also in the new employee onboarding programme developed at SNN Group companies level, to ensure familiarisation with the company’s principles and values, including ethics and compliance. Knowledge acquired is tested through a specific questionnaire developed by the Ethics and Integrity Service.

The onboarding programme devised by the SNN Group ensures that all new employees become familiar with the Company’s principles and values; in terms of ethics and

compliance, various materials are made available to such employees, whose knowledge is tested in the end. In 2025, a total of 190 new employees participated in this program at the Headquarters (22 employees) Pitesti NFP (9 employees), Cernavoda NPP (159 employees).

In 2025, the staff of the Ethics and Integrity Department participated in a series of events, meetings, webinars, and symposia focused on integrity themes and organised by the OECD, the Agency for Monitoring and Assessing the Performance of Public Enterprises (AMEPIP), the Embassy of Italy in Bucharest, HarrisonApp, the Ministry of Justice, and the OSCE.

The training for **FPCU Feldioara** employees who collaborate with suppliers on business conduct is done annually according to the Code of Ethics. In 2025, the Code of Ethics was processed with the employees.

In terms of courses, FPCU Feldioara organised courses on Ethics, Corruption and Anti – Fraud and Integrity Whistleblower. The number of participants for each course is presented in the table at the end of the G1 – 3 section.

With regard to ethics and compliance, various materials are made available to employees concerning the role of the whistleblower and the legal regime of incompatibilities. The assimilation of knowledge is tested through a specific questionnaire designed by the Ethics Advisor. In 2025, a total of 280 employees from FPCU Feldioara S.R.L. participated in this training.

In 2025, 8 new hires get acquainted with the provisions of the Code of Professional Ethics and Conduct, and 8 people were trained externally on Ethics, Integrity and Anticorruption.

#### EnergONuclear

During 2025 Ethics, Corruption and Anti – Fraud and Integrity Whistleblower courses were provided. The number of participants for each course is presented in the table at the end of the G1 – 3 section.

#### NuclearelectricaServ

For all newly hired staff, a primary induction training on the requirements of the Anti-Bribery Policy and Code of Conduct is given and they sign an Anti-Bribery Declaration and a Commitment.












#### Funcții expuse riscului

At Group level, the sensitive functions are established according to the Order of the General Secretariat of the Government no. 600/2018 on the approval of the Code of internal managerial control of public entities and internal procedure CM – 00 – 02 rev. 1 *Management of sensitive functions at the SNN level.*

In total there are 632 people with sensitive functions at Group level. Thus, annual reports are submitted, as such, on all the criteria established by OSGG 600/2018 (improper use of human, material, financial and informational resources or corruption or fraud), to the Ministry of Justice, for the establishment of the inventory of measures related to the National Anti – Corruption Strategy 2021 – 2025.



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According to the bribery risk register, the identified higher risk areas generally applicable to all SNN Group entities are those related to the employment of staff, procurement, sponsorship and use of company assets.

#### **FPCU Feldioara**

The positions of CEO, as well as those of heads of departments, divisions or sections, are considered to be positions exposed to risks of corruption, including the risk of bribery. At the level of the company, the management and prevention of these risks is provided by applying the following internal procedures:

- Procedure on Sensitive Positions (S-SA-09);
- Procedure on Assets and Interests Disclosure (S-SA-08);
- Procedure on Gift Disclosure (S-SA-07).

In **Nuclearelectrica SERV**, the following sensitive positions have been identified: Executive Officers; Heads of Departments; and Heads of Services. The specific identification activity is described in the system procedure code PS-NS-07 Sensitive Positions. The system procedure code PS-NS-SMAM-01 Gift Disclosure is also applicable.

In **Energionuclear**, the positions of Executive Officer, Heads of Department/Services, legal advisor, procurement expert/economist, SMAM manager and HR specialist are defined as sensitive positions and are subject to risks of bribery and corruption. Management of the risks these sensitive positions are subject to: P-Ru-10\_Sensitive Positions in EN, P-Ru-11\_Granteeing and Accepting Benefits in EN, P-Ru-15\_Management of Assets and Interests Disclosures in EN.



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## SNN Group Professional Conduct



### Management of relationships with suppliers | ESRS G1-2



#### Supplier selection

##### Supplier Selection Policies

Regarding the relationship with suppliers, within the SNN there are specific procedures based on Law 99/2016 on sectoral procurement, supplier auditing procedures, as well as mandatory clauses on social and environmental matters in each contract.

SNN follows the legal public procurement procedure. There are SNN suppliers from Romania and other countries in the value chain, each with commitments to respect the human rights.

In addition, the management systems (integrated – quality, OHS, environment, social) of the suppliers are audited in the procurement process (for qualification), including for those outside Romania. Consideration is given to compliance with the legal public procurement requirements and criteria in supplier selection.

SNN is investigating new methods of supplier checking, taking into account the legal constraints (related to public procurement). The social performance of suppliers from outside Romania in respecting the human rights is communicated as appropriate and can be found on their websites.

According to the List of Pitesti NFP – Qualified Suppliers, the external suppliers of raw materials are:

- Framatome for Zy – 4 zirconium alloy sheets and bars <https://www.framatome.com/fr/contactez-nous/>
- FPCU Feldioara for sinterizable uranium dioxide powder UO<sub>2</sub> – <https://www.cameco.com>
- BWXT for Zy – 4 tubes <https://www.bwxt.com/bwxt-nec>
- Cameco for U3O8 uranium concentrate and Zy – 4 wire <https://www.cameco.com/>
- Ulba Metallurgical for beryllium R <http://www.ulba.kz/en/>
- Henkel Romania for colloidal graphite <https://www.henkel.ro/>
- Linde for helium – [office.ro@linde.com](mailto:office.ro@linde.com)
- Siad for helium – [siad@siad.ro](mailto:siad@siad.ro); <https://www.siad.ro>
- Brenntag for zinc stearate <https://www.brenntag.com/en-ro/>
- SC Chemical Company SA – for isopropyl alcohol <http://www.chemicalcompany.eu>
- Kazatomprom for concentrated uranium U<sub>3</sub>O<sub>8</sub> <https://www.kazatomprom.kz/en/>

The procurement documentation includes provisions on compliance with environmental and social criteria, so that SNN can ensure that the partners in the value chain comply with environmental and social criteria. All contracts also have a clause on compliance with ESG principles and standards.



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### FPCU Feldioara

At FPCU Feldioara, to ensure compliance with the social and environmental criteria in the procurement process, the Procedure on Supplier Assessment and Selection (code S-AP-11) was developed and approved. This procedure sets out the framework for analysing and selecting suppliers in accordance with the principles of social responsibility and environmental protection.

The procurement documentation includes provisions on compliance with environmental and social criteria, so that FPCU can ensure that the partners in the value chain comply with environmental and social criteria.

### EnergoNuclear

At the entity level there are several approved internal procedures regarding the performance of procurement activities:

- Procurement process in EnergoNuclear (P – Pr – 01);
- Supplier evaluation in EnergoNuclear (P – Pr – 02);
- Making purchases exempted from the application of Law 99 2016 (P – Pr – 05);
- Procurement of social services and other specific services stipulated in Annex 2 to Law 99 (P – Pr – 06);
- Instructions for Publishing Integrity Forms (I – Pr – 02).

At **NuclearelectricaServ** there is a set of procedures specific to the procurement process, which include legal requirements related to procurement and suppliers' duties in the execution of contracts, including the necessary means of communication and payments.

The specific applicable procedures are generated by the system procedure code PS-NS-39 Procurement, which also

includes the procedure code PO-NS-02.02.01 Performance and Monitoring of Public Procurement Contracts. Based on the records of the contracts entered into with suppliers, the List of Suppliers of Nuclearelectrica Serv S.R.L. is compiled. A Conflict of Interest Disclosure and the Anti-Bribery Policy are also sent to the suppliers, at the start of the contracts with them.

### Methods applied to identify and manage late payment situations

The Board of Directors of SNN has approved the financial resources management policy (Decision 68/17.04.2021) which has among its objectives the adequate cash – flow planning in order to ensure at any time the availability of money on current accounts for the fulfilment of the Company's payment obligations (creditors/suppliers/ employees, etc.)

The processing of payments within SNN is carried out according to the procedure code FC – 00 – 01 on making payments within SNN, which establishes the methodology of circulation, endorsement and approval of invoices/documents issued by suppliers from the entry into the company until the effective payment. According to the procedure, the invoices/payment documents are recorded in the due date ledger and the "Payment Authorisation" document is drawn up and endorsed/approved by the SNN staff responsible for verifying the supporting documents and approving the payment (contract owner, designated staff with CFP endorsement, SPD staff, chief accountant, director, etc.).

SPD staff has a target to "Avoid penalties by making payments to suppliers on their respective the due dates

(making sure that payments are not delayed)", which is monitored on a quarterly basis.

In all contracts, orders and framework agreements signed between the SNN Group of companies and suppliers there is a provision requiring observance of the maximum time-limit of 30 days for payment for the goods and services purchased.

**SNN Group Professional Conduct**

**Prevention and detection of corruption and bribery | ESRS G1-3**

The graphic features a blue header with the text 'SNN Group Professional Conduct' and an icon of three people walking up a staircase. Below this, the text 'Prevention and detection of corruption and bribery | ESRS G1-3' is displayed in a white box with a blue border. At the bottom right of the box is a hand icon pointing to a horizontal line.

As a socially responsible company, we assume full responsibility for the actions taking place in our sphere of influence. We reserve the right to express our position on corruption prevention in all aspects related to our activities, employees or business partners.



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The anti-corruption policy of the SNN Group aims to foster and facilitate prevention and control of corruption and sets anti-corruption principles for all employees of the SNN Group companies, as well as for its business partners. The anti-corruption principles implemented in this policy are:

- The management of each SNN Group company and their staff comply with, and maintain, the principle of “zero tolerance” to bribery and corruption. Consequently, any needed and proportionate measure is encouraged to ensure compliance with this principle.
- The management of each SNN Group company and their staff are committed to comply with the domestic legislation and the applicable regulatory framework regarding the fight against corruption.

The anti-corruption policy cannot anticipate or prevent all potential business situations in which the managements of SNN Group companies or their employees could find themselves, and in which elements of corruption could appear. In the event of situations not covered by this Anti-Corruption Policy, it is necessary to seek guidance from the line manager, the Ethics Advisor, the branch compliance representative or Head of the Compliance Office, as appointed in each entity of the SNN Group.

The policy is an integral part of the Anti-Bribery Management System, certified according to the requirements of ISO 37001:2016. In order to ensure integration of the requirements of the anti-bribery management system into the Company's processes, the internal regulatory anti-corruption framework was consolidated and developed **by policies and procedures; of these, we list:**

- *The Anti-Corruption Policy*, intended to encourage and facilitate prevention and control of corruption, and setting out the anti-corruption principles for all employees, as a framework for definition, revision and attainment of the anti-corruption objectives;
- *The procedure “Compliance with the Anti – Corruption Policy”*, that regulates the scope and structure of the compliance function set up to ensure compliance with the principles of the Anti – Corruption Policy;
- *The procedure on “Implementation of financial and non-financial anticorruption compliance controls”* which describes how the relevant controls are implemented for prevention, detection and investigation of corruption risks;
- *The procedure for assessment of the business partners* in terms of the risks attached to the anti-corruption compliance system, which describes how business partners are screened in order to minimise the risks generated by the transactions carried out by SNN Group companies;
- *The procedure on “Identification, assessment and prevention of conflict of interests”*;
- *The Anti – Fraud Policy*;
- Irregularity reporting;
- Estimation of the compliance and reputational risks.

#### Key criteria considered to assess the risk of corruption and bribery:

- Sanctions or withdrawal of permits;
- Involvement of the Company or its employees in disputes;
- Loss of strategic business partners;

- Increasing number of reported irregularities;
- Nature, size and complexity of processes and activities;
- Business partner anti-bribery management system: suppliers, customers and consultants;
- Locations and business lines where the organisation operates or envisages operating.

The **anti-bribery management system** developed in the companies of the SNN Group is adapted to the requirements of the standard ISO 37001:2016 and contains internal control procedures for the following processes:

- Disclosure of gifts and other benefits;
- Prevention of conflicts of interest, incompatibilities and pantouflage;
- Mandate of ethics advisor and compliance officer;
- Whistleblower protection;
- Preventive measures for management of sensitive positions;
- Sponsorships, donations and other charitable activities;
- Employee expense reports.

Also, all SNN Group companies have established **mechanisms for monitoring and warning** of the occurrence of any threats or non-compliances with the ethics and integrity rules, such as:

- Regular identification and assessment of the corruption risks;
- Disclosure by the Company's employees of any potential conflicts of interest and use of an application to disclose and consolidate the said information;



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- Anti – corruption contractual clauses included in contracts with business partners;
- Regular employee counselling programme set up by the Ethics Advisors;
- Means of communication provided to the whistleblowers and analysis of the complaints/reports depending on their nature;
- Screening of business partners in terms of their anti-corruption management system;
- Internal controls aimed at preventing occurrence of fraud and corruption;
- Analysis of sponsorship applicants in terms of their ethical behaviour.

No company of the SNN Group has not been involved in any (pending or settled) court actions concerning anti-competitive behaviours. The code of ethics and conduct sets out the principles that govern the ethical and professional conduct of the employees of SNN Group companies. The anti-corruption policy defines the terms corruption and bribery. The term “Facilitation Payments” is not defined in the Romanian legislation, is interpreted in the legislation as bribery.

Corruption prevention and control is the main responsibility of the Ethics and Integrity Service of SNN, which is regularly allocated the necessary resources to attain its objectives. The Head of Ethics and Integrity Service of SNN is the designated Compliance Officer for the entire SNN Group of companies.

### Investigation of complaints by the Ethics and Integrity Service

All reports received are carefully reviewed by the Ethics and Integrity Service of SNN, subject to full secrecy and confidentiality. According to the procedure “Reporting irregularities and protection of whistleblowers in the public interest within SNN”, The Ethics and Integrity Service selects the referrals depending to the specific procedure, reviews them carefully, but can only act on those that disclose instances of fraud (including improper actions and accounting and auditing practices that come against the international practices and the applicable provisions), corruption and conflicts of interest. Other referrals, which do not concern matters related to the activity of the service, are forwarded for processing to the competent structure of the Company. The procedures are similar for the other SNN subsidiaries.

The information can be provided anonymously; however, this means that the Ethics and Integrity Service cannot contact the person who file the referral/report for additional information, and this makes it more difficult to address the issue.

The person who files a referral is advised not to communicate to other people the details of the issues they reported, considering that this could have an unfavourable impact on any future investigation.

All referrals sent are treated as strictly confidential by all the units involved at the SNN Group level.

SNN Ethics and Integrity Service receives all complaints of the employees using the Whistleblower platform,

available both on the intranet and on the SNN website or on other channels (in writing or electronically to the dedicated e – mail addresses) and is responsible for their review, assessment and resolution thereof. Depending on the referral content, the Ethics and Integrity Service may initiate preliminary assessments of the matters concerned, compliance investigations, or ad – hoc audits together with the Internal Audit Department, or anti – fraud investigations together with the Anti – Fraud Office, all concluding with a report to the SNN management. Also, in less complex cases, the Ethics and Integrity Service works together with other responsible units to process referrals.

All complaints are treated strictly confidentially and with a high degree of professionalism and independence. Following the investigation carried out, the designated structure responsible for investigating the complaint issues a report and communicates it to the General Director of SNN, the Compliance Office, the Anti – Fraud Office and the Internal Audit Department. On the basis of the report issued, the Director General or other designated responsible persons shall take appropriate action:

- disciplinary/administrative investigation;
- referral to criminal investigation;
- proposals to improve the SNN Group's policies and regulations in order to prevent recurrence of risks and misconduct;
- including the resolution of the case in the Quarterly Whistleblowing Report to the Board of Directors.



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If the General Director or a member of the Board of Directors has a potential conflict of interest in relation to the subject matter of the complaint, the Compliance Office will communicate the investigation report directly to the Board of Directors and the Audit Committee of SNN.

The preliminary assessments/investigations/audit engagements conclude with a report intended for the General Director of SNN. Where issues are more important, these are also reported to the Board of Directors (Audit Advisory Committee). An annual report on the activities of the Ethics and Integrity Service is prepared and submitted to the Audit Advisory Committee. Where administrative/disciplinary investigation of persons or facts is required, independent Disciplinary Committees are set up to review the issues identified and propose measures accordingly.

**Communication of the policies with stakeholders**

The training programme drafted by the Ethics and Integrity Service includes regular participation in workshops and specific trainings for all employees on topics related to fraud, corruption, ethics and integrity.

In order to advance responsible and fair, as well as compliance with, the standards among business partners (customers and suppliers), the SNN Group conducts permanent checks thereon, for all contracts concluded and amounting to more than RON 270,000, within two main segments:

- in terms of potential conflicts of interest, against the information entered by the SNN Group employees in

AMCI – Conflict of Interest Management Application; so as to avoid instances where our employees or their next of kin up to the 4th degree could be involved in as part of the procurement/supply procedures or in performance of contracts with companies which they hold any interest in (shareholders, directors or employees);

In 2025, the Ethics and Integrity Service carried out such checks on a total of 246 partners, but no potential cases of conflict of interest were identified.

- In terms of the overall corruption risk, by assessing the partners' anti-bribery management system, based on a questionnaire containing a set of questions, depending on which a score is given and partners are rated in one of the risk categories (low, medium or high).

In 2025, the Ethics and Integrity Service carried out such assessments on a total of 91 partners, of which 71 were qualified with low risk, and other 20 with medium risk. For the 20 partners categorised in the medium risk category, their own set of anti-corruption compliance policies were communicated: Compliance Guidelines, Business Partner Integrity Guidelines, excerpts from the SNN Anti – Corruption Policy, excerpts from the SNN Group Anti – Corruption Policy Compliance Manual, for the purpose of being made known to the management and employees of the business partner involved in the processes of negotiating/performing contracts with SNN.

In the internal procedure AF – 00 – 03 – Granting and accepting benefits it is prohibited to grant any benefits to

the authorities, business partners or any other persons in order to facilitate approvals, permits or unlawfully obtaining a business decision. Also, SNN has a procedure dedicated to conflicts of interests. Employees are under the obligation to disclose any personal interests that conflict with the interests of the Company. Declarations must be submitted on recruitment and when changing jobs and are renewed annually. The SNN subsidiaries comply with the provisions of their own Codes of Conduct and Internal Regulations.



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Number of employees participating in training programmes on prevention and detection of corruption and bribery in 2025 at the SNN Group level

Employees participating in courses with the topic	SNN Headquarters	Cernavoda NPP	Pitesti NFP	FPCU Feldioara	NuclearelectricaServ	EnergONuclear	Total SNN Group
<b>Ethics</b>	176	0	285	280	0	0	741
<b>Corruption and Anti – Fraud</b>	433	1315	660	16	0	1	2425
<b>Whistleblower</b>	200	1034	158	280	0	15	1687

Separate training resources were provided to the SNN Board of Directors members in two stages in 2025: in May for new members, following the change in the governing body's membership, and for all members in December. The training resources included presentations of the Board of Directors' Code of Professional Ethics and Conduct, the document containing the SNN's Anticorruption Policy and the Code of Business Ethics and Conduct.

## SNN Group Professional Conduct

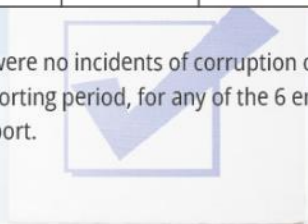


**Confirmed cases of corruption or bribery | ESRS G1-4**



Incident	Status	Summary of remedial actions
N/A	N/A	N/A

There were no incidents of corruption or bribery during the reporting period, for any of the 6 entities included in the Report.



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# SNN Group NUCLEAR SAFETY



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## SNN Group Nuclear safety



Material impacts, risks and opportunities and their interaction with strategy and business model | *IRO-1; SBM-3*



The permanent maintenance of a high level of nuclear safety in all phases of performance and operation of nuclear objectives and facilities is of vital importance and constitutes the first priority for the SNN Group, as part of the Nuclear Safety Culture.

The nuclear safety philosophy of CANDU – type power plants is based on the concept of “Defence in Depth”, which ensures gradual protection in the event of equipment failures, human errors, transient regimes anticipated in operation or accidents, including severe accidents. For the implementation of this concept, the project foresees a number of successive protection barriers against the uncontrolled release of radioactive materials into the environment. In addition to the five major barriers against the release of fission products to the population from a CANDU 6 – type power plant: fuel matrix, fuel sheath, primary circuit enclosure, containment enclosure and exclusion zone; passive or active characteristics have been included in the system design, intended to prevent or limit the consequences of a process failure or accident sequences, which could otherwise lead to releases of radioactive materials into the environment.

So far, no CANDU 6 – type nuclear power plant has reported events or accidents that threaten the health or safety of the population. To supplement the measures intended for the power plant's operation under full safety conditions, planning and preparation for emergency situations is a mandatory condition for authorising a nuclear power plant to operate. At Cernavoda nuclear power plant, emergency preparedness is checked and improved in quarterly, annual or general drills (once every 3 – 4 years).

In the aftermath of the Fukushima accident, the European Commission and the Group of European Regulators of the Nuclear Society have decided that the nuclear safety of nuclear power plants in Europe should be reviewed based on transparent and extensive risk assessments, called “Stress Tests”. The technical purpose of these stress tests was defined considering the risks that were highlighted by the events at Fukushima. Emphasis was placed on the following issues: the triggering events, such as earthquakes or floods, the consequences of the loss of the safety functions during these events, as well as the difficulties of managing severe accidents.

Cernavoda NPP issued the “Report on Reassessment of the Nuclear Safety Margins”. The assessment conducted proves that Units 1 and 2 of Cernavoda NPP meet the nuclear safety requirements set out under the design and can face severe earthquakes and floods, as well as the total loss of electricity supply and cooling water. In addition, methods and procedures were identified for the management of potential severe accidents. Also, methods were identified to prevent and limit the consequences of accidents that can cause melting of the active area. To ensure an appropriate response to events that exceed the design basis, design changes have been implemented to enhance the nuclear safety of the plant. Consequently, new systems were installed, while the systems provided for in the original design were reassessed and enhanced to perform supplementary functions during such events, aimed at mitigating the consequences for the population and the environment.

In order to ensure good coordination with the competent Local Public Authorities on the response to emergency



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situations, Cernavoda NPP has set up two important facilities for the town of Cernavoda, namely: The Local Centre for Emergencies of the Cernavoda Municipality and the Personal Decontamination Area, in the Cernavoda Town Hospital.

The risk system developed in the Company is aligned to the standard ISO 31000:2018. SNN Group does not hold an ISO 31000 certification, because no certification body has been yet identified for this standard in Romania; however, in the annual review of the system, we perform compliance analyses to ensure compliance with the standard's requirements. The risk management system is aligned also with the COSO and BASEL standards.

For internal risk reporting and review, the SNN Group uses a national system of internal managerial control (SCIM). The safety-related impacts and risks were also assessed as part of the materiality assessment process and the results can be seen in the table below.

Topic – Additional subject	Impacts
Nuclear Safety	<b>Potential, negative impact:</b> Nuclear – impact incident, with fatalities, long – term damage to human health and the environment, to SNN's reputation, violation of the legal requirements and business closure. <i>Applicable for Cernavoda NPP, Pitesti NFP and FPCU Feldioara</i>
Nuclear Safety	<b>Potential, negative impact:</b> Nuclear accident with long – term impact on population and environment. <i>Applicable to Cernavoda NPP</i>

The risks associated with these impacts, as identified and assessed during the materiality assessment, could result in very high negative financial effects for the Company. However, since the likelihood of their occurrence is extremely low, these were determined to be immaterial, as the assessment fell below the materiality threshold of 30%.

The risks listed the risk register and the Company's risk universe are reviewed quarterly, with actions to be taken, according to specific situations. Risk assessment in the SNN Group is carried out according to MR – 00 – 01 – Risk management procedure in S.N. Nuclearelectrica S.A., and results are described in the Risk Management Report, with a focus on the main risks which the SNN Group faces.

The main categories of risks presented on a quarterly basis in the Risk Management report are:

- risks related to nuclear safety (Nuclear Safety);
- the information safety risks, guarantee control and

physical protection risks (protection of nuclear material and of the radioactive materials);

- the compliance risks, divided into 3 subcategories, respectively fraud risks, compliance risks (ethics integrity, conflict of interests) and other compliance risks (risks regarding the compliance with the external regulation framework – for example: laws, ordinances, rules, and with the internal regulation framework – for example internal policies, processes, procedures).
- risks attached to the supply chain, in particular to procurement;
- ESG risks;
- risks related to the major investment projects.

Most of the risks in these categories are in the green zone, having been established controls and monitoring tools to prevent their occurrence.

Nuclear safety risks are systematically addressed in the SNN Group, in the context of the Group's commitment to ensure Nuclear Safety.

The risk register identifies items specific to nuclear safety, as follows:

- Damages to the nuclear safety equipment and systems
- Breakdown of cooling equipment that serves the fuel in the Loading and Unloading Machine (MID) or on the unloading route (Spent fuel Unloading Gate, Spent Fuel Unloading Bucket)
- Mechanical damages to bundles during underwater storage manoeuvres
- Delays in completion of the training programme for



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- the CNCAN initial authorisation and reauthorisation of the operating staff (Coordinator Senior Nuclear Control Room Operator and Chief Lead Dispatcher)
- Loss of certified staff needed for implementation of the independent assessment requirements (authorisation provided in NSN – 20 and NMC – 02 procedures)
- Exceeding the storage capacity for the liquid and radioactive waste
- FB damages in case of a traffic accident
- Increase in the average annual radioactive concentration for airborne dusts with uranium/radioactive aerosols, compared to the limits set by CNCAN
- Inadequate protection of employees in case of an accident
- Staff illness (occupational illnesses)
- Inadequate acquisition of OHS knowledge
- Incorrect reaction in case of an emergency
- Reduction of the Emergency Core Cooling operating margin

For each matter, internal controls and monitoring tools are considered to address the risk, and a responsible department is identified.

## SNN Group Nuclear safety



### Nuclear safety policies and how these are implemented under specific procedures | *MDR-P*



The SNN Group has developed and respects a nuclear safety policy that was approved by CNCAN, in order to maintain a high and constant level of nuclear safety in all phases of the commissioning and exploitation process of nuclear installations. The nuclear safety policy provides guarantees of good execution for all important activities regarding nuclear safety, in all phases of implementation and exploitation of nuclear installations. This document confirms that nuclear safety has the highest priority.

The management of the SNN Group has taken up responsibility and commitment for the operation of nuclear assets at a level of excellence in nuclear safety, for the maintenance of assets, maintaining environmental releases below the regulated level, as well as for















maintaining the production capacity above the average level in the industry.

The Nuclear Safety Policy document approved by the Romanian Nuclear Regulatory Authority confirms the top nuclear safety priority in the Company. It stipulates that every employee of the Company is required to respect Nuclear Safety, as well as to behave in accordance with traits of a healthy Nuclear Safety Culture.

The Major Accident Prevention Policy is available to all employees, subcontractors and visitors and is processed to employees as part of their training process. There is also an organisational structure for emergency situations, with clear responsibilities and concrete steps to be taken in the referenced situations.

The SNN Group also respects and implements the National Nuclear Safety and Security Strategy of CNCAN, as found in the Decision no. 600/23 July 2014, and published in the Official Gazette no. 564.

Specifically, for **Cernavoda NPP**, assessment and continuous improvement of the Management System defines also the Continuous Nuclear and Corporate Safety Performance Improvement Programme. Under this programme, performance is monitored, performance gaps are identified and reviewed, the actions resulting from the identified improvement initiatives are implemented, and the effectiveness of the integrated performance assessment process is monitored.

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## SNN Group Nuclear safety



**Actions taken, planned or in progress to prevent or mitigate the nuclear safety-related material negative impacts | MDR-A**



Nuclear safety as a field is a set of technical and organisational measures intended to:

- ensure the safe operation of nuclear facilities;
- prevent and limit their deterioration;
- ensure the protection of the staff, the population and the environment against radiation or radioactive contamination.

### Cernavoda NPP

In Cernavoda NPP, nuclear, population, staff and environmental safety takes priority over the production-related matters, and units are operated in

strict observance of the requirements of the operating permits, and within the limits set out therein, as follows:

- Only trained, skilled and, as the case may be, authorised staff are used to carry out the activities, according to the requirements of the regulatory documentation;
- Cernavoda NPP provides the funds and resources needed to achieve high performance in all fields and is committed to the efficient management of these funds;
- Each Cernavoda NPP employee is aware of, and responsible for, the quality of their work and is required to report any deficiency in their own work or that of their co-workers;
- Cernavoda NPP provides protective equipment and any tools needed for performance of the activities, as well as the infrastructure required to prevent accidents;
- Cernavoda NPP ensures physical protection of the site in accordance with the legal provisions.

In order to limit the consequences of radiological and/or chemical incidents, with or without impact on the environment, Cernavoda NPP has defined an emergency response plan, subject to CNCAN approval. In order to check the readiness of Cernavoda NPP for emergency response, regular drills are defined and conducted, the results of which are assessed and any lessons learned are transferred to the “Action Tracking”.

The Operation Manual – Emergency Procedures – 0/1/2 – 03420 – OM – 001 provides instructions and guidance to the plant’s staff as to the actions to be taken in the event of an emergency. The Specific requirements for

preparation and implementation of emergency plans are contained in the documents associated with the emergency response planning and preparedness process, as described in RD – 01364 – RP008. Coordination of the process is provided by the Radiation Protection Technical Service of DRSM – PSI. Organisation of the staff involved in the emergency response is also described.

Detailed information about the nuclear safety assessments can be found in the procedures applied to manage the operating licenses of the nuclear installations, as described in the procedure RD-01364-L008 – “Management of the Nuclear Safety Permits in Cernavoda NPP”. Process coordination is provided by the Nuclear Safety, Licensing and Performance Improvement Department.

At least annually, nuclear safety performance is assessed with the aid of external specialists from other nuclear power plants. The areas to be assessed are determined by the management of Cernavoda NPP. As a rule, the areas of activity with a major impact on nuclear safety and where underperformance or need for improvement has been identified, are selected. The assessment activities are organised according to EISN – 00 – 03 – “Independent External Assessment of the Nuclear Safety and Performance”.

### Pitesti NPP

In Pitesti NPP, nuclear safety takes priority in all activities, ensuring that the general nuclear safety objective, namely protecting the public, occupationally exposed personnel, and the environment against ionising radiation, is met.



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Stewardship of the compliance with the nuclear safety requirements and assurance of optimal conditions for formation, maintenance and monitoring of the nuclear safety culture rest with the Pitesti NFP General Manager. The Pitesti NFP Manager declared his commitment to ensuring nuclear safety as a priority, and the Integrated Management System put in place in Pitesti NFP supports and promotes the nuclear safety culture at all execution and management levels of the organisation, by:

- Recognising the nuclear safety as a clear value, that takes decision-making priority;
- Ensuring a consistent understanding of the fundamental aspects of safety culture, to the benefit of the organisation;
- Providing the means whereby the organisation supports the safe and successful completion of individual and team tasks, taking into account the human – machine – organisation interaction;
- Strengthening a questioning and learning attitude across all levels;
- Keeping the risks as low as reasonably achievable, taking into account the technical, economic and social factors;
- Providing the means whereby the organisation continually seeks to develop and improve its safety culture;

Promotion and development of a safety culture in Pitesti NFP is achieved by communicating the policy to all employees, providing initial and continuous personnel training and awareness, establishing responsibilities and duties at all levels, and ensuring supplier qualification and oversight.

The nuclear safety functions applicable to Pitesti NFP are:

- Retention of radioactive materials, including maintenance of physical barriers against their release into the environment;
- Control and monitoring of the conditions of the installation, and provision of the support services as needed to maintain the functions listed at the previous paragraph;

Pitesti NFP provides financial resources and human resources with adequate qualifications and skills, as needed to meet its nuclear safety obligations.

Within Pitesti NFP, the Integrated Management System contains also the process “Nuclear Safety and Safeguards”, which documents how the requirements of the applicable nuclear safety and safeguards standards, as well as specific and relevant domestic and international regulations, are implemented.

Since Pitesti NFP is exposed to a radiological risk, NFP devised and put in place and documented radiological protection programmes, taking into account the radiological risks specific to the activities carried out and compliance with the legal and regulatory requirements issued by CNCAN, as well as the principles set by the relevant international organisations and committees. With a view to keeping the radiological risk as low as possible, Pitesti NFP undertakes the following actions:

- Provision of initial and continuous training by refreshment training of its own staff;
- Delivery of training to the external personnel before they commence rendering any work in Pitesti NFP's

spaces

- Putting in place an integrated system of procedures and work instructions aimed at preventing and reducing the potential radiological risks
- Provision of collective and individual protective equipment
- Provision of the radiological monitoring of workers and the work environment
- Provision supervision for the workers' health state.

#### FPCU Feldioara

As regards the plans and actions of FPCU Feldioara SRL, it has included in its organisation chart the Environmental Protection Service, Environmental and Radiation Protection Laboratory, within which the persons responsible for radiological safety for the activities taking place on the industrial platform have been appointed by order. The Radiological Safety Officer is the holder of a level 2 license issued by CNCAN and must periodically control the way in which the measures regarding the radiological safety of the installations, the protection of the occupationally exposed personnel and the population are applied. The main tasks of the radiation safety officer are:

- To coordinate specific radiation protection activities in the unit;
- To evaluate the radiologic part in close connection with the health of the unit staff;
- To ensure that all necessary measures are taken in order to comply with the legislation in force regarding the radiological safety activity in the unit;
- To ensure the implementation of the NSR and NMR and any other documents elaborated by the



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authorities in the field of radiological safety within the unit;

- Keep the most exposed workplaces under surveillance in order to reduce doses as rationally as possible, in accordance with ALARA principles;
- Ensure that doses are properly assessed and periodically report on the extent of exposures;
- Conducts workplace monitoring activities and any other special monitoring program required by CNCAN;
- Organise annual testing sessions for all occupationally exposed personnel, following which minutes of examination will be drawn up in order to endorse, respectively extend the validity of level 1 licenses, etc.

In 2025, no remedial measures were imposed because there was no real material impact in any of the SNN Group's sites. Also, there were no nuclear safety-related incidents or accidents in the reporting year.

## SNN Group Nuclear safety



**Time – bound and result – oriented targets**  
| *MDR-T*

















As part of the Company's ESG priorities, under the Governance heading, we give priority to the operating and production, and infrastructure and asset protection procedures. Our objective is to permanently ensure the nuclear safety of the nuclear assets, as well digital security, as a safeguard for all processes and activities in the Company.

Regarding the operation of nuclear units in nuclear safe and secure conditions for the staff, population, environment and production assets, we want to ensure:

- Maintaining maximum availability of the engineering and nuclear and radiological safety-related functions.
- Improving/maintaining high professional training of the staff who operate the two nuclear units.
- Maintaining the radioactive releases in water and air below the regulated level.
- Maintaining membership of international nuclear energy organisations and, if necessary, membership of other organisations.
- Ensuring the oversight function.



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# SNN Group Report on the EU Taxonomy for the financial year 2025



## 1. Introduction



This report presents the key performance indicators set out in Article 8 of the EU Taxonomy, EU Regulation 2020/852<sup>20</sup> and related delegated regulations<sup>21</sup> for Societatea Nationala Nuclearelectrica S.A. hereinafter referred to as “SNN” or the “Company”. SNN comprises several branches and subsidiaries operating in Romania, with activities related to the production of electricity from nuclear sources, as follows:

- SNN Headquarters
- Cernavoda NPP
- Pitesti NFP
- EnergoNuclear
- FPCU Feldioara
- NuclearelectricaServ

The EU Taxonomy is a classification system that defines which economic activities can be considered environmentally sustainable. This classification system sets six environmental objectives:

- Climate change mitigation
- Climate change adaptation
- Sustainable use and protection of water and marine resources
- Transition to a circular economy
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

An “**eligible**” economic activity is one that corresponds to the description of one of the activities defined in

Delegated Regulations (EU) 2021/2139, 2022/1214, 2023/2485 and 2023/2486. An “eligible” activity has the potential to be considered environmentally sustainable (i.e. “**aligned**”) if it also meets the additional criteria listed in the (EU) delegated regulations. More precisely, an economic activity is eligible regardless of whether it fulfils one or all of the technical examination criteria laid down in the delegated (EU) Regulations. Therefore, the fact that an economic activity is eligible for the Taxonomy does not provide any indication of the environmental performance and sustainability of that activity.

An “**aligned**” activity must fulfil the following 4 conditions, as laid down in Article 3 of EU Regulation 2020/8521:

- makes a substantial contribution to one or more of the six environmental objectives.
- does not cause significant damage to any of the other five environmental objectives.
- respect minimum social guarantees<sup>22</sup> relating to the duty of due diligence on human rights, the fight against corruption and bribery, fair taxation and fair competition.
- meet the technical examination criteria set by the EU and listed in the delegated acts.

Eligibility and alignment with the EU Taxonomy should be reported financially as a percentage of a Company's total income, total capital expenditure (CapEx) and selected operating expenditure (OpEx).

<sup>20</sup> Regulation (EU) 2020/852 of the European Parliament and of the Council, published in the Official Journal of the European Union of June 22, 2020.

<sup>21</sup> The Delegated Act on Climate Change (Commission Delegated Regulation (EU) 2021/2139 of June 4, 2021 and (EU) 2022.1214 of March 9, 2022) and the Delegated Act on the information on performance indicators to be provided [Commission Delegated Regulation (EU) 2021/2178 of July 6, 2021].

<sup>22</sup> Minimum guarantees are procedures put in place by a company engaging in an economic activity in order to ensure compliance with the OECD Guidelines for multinational organisations and the UN Guiding Principles on business and human rights, including the principles and rights set out



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For FY 2025, SNN reports its contribution in terms of “eligible” and “aligned” activities for at least one of the six environmental objectives, where applicable.

The company carried out its assessment for the financial year 2025 using the EU Taxonomy Regulation and related documentation, additional guidance issued by the European Commission in the form of Frequently Asked Questions (FAQs) and, where the criteria and guidance still leave room for interpretation, its own analysis of the criteria. The EU Taxonomy is itself subject to regular review, and the interpretation of the Taxonomy and its criteria may change over time, which could lead to different results in terms of eligibility and alignment with the EU Taxonomy in future reporting periods.

In accordance with Commission Delegated Regulation (EU) 2026/73 of 4 July 2025, amending Delegated Regulation (EU) 2021/2178 and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486, for the 2025 financial year, the Company has opted to report under the 2025 regulations, with the intention of applying Delegated Regulation (EU) 2026/73 starting from the 2026 financial year.

## SNN Group Report on the EU Taxonomy for the financial year 2025



### 2. Evaluation of eligibility to the EU Taxonomy for the financial year 2025



The assessment of the eligibility of the activities of SNN in relation to the EU Taxonomy consisted in comparing the description of the activity and/or products with the descriptions of the activities in the Taxonomy that contribute to the six environmental objectives as defined in the delegated acts under the Taxonomy Regulations<sup>23</sup>.

This comparison also took into account CAEN codes<sup>24</sup> and the applicable criteria for a substantial contribution.

under the eight fundamental conventions identified in the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the International Charter of Human Rights. Human rights.

<sup>23</sup> Delegated Climate Act 2021/2139, Supplementary Delegated Climate Act 2022/1214, Delegated Environmental Act 2023/2486 and amendments to the Delegated Climate Act 2023/2485.

<sup>24</sup> The EU Taxonomy includes a reference to the CAEN codes for each activity. However, these references are only illustrative and do not replace the specific definition in the text of the Climate Change Delegated Act.



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# SNN Group Report on the EU Taxonomy for the financial year 2025



## 2.1. Turnover



SNN is one of the most important energy producers in Romania, with a significant impact on the national economy. SNN is the only electric power producer based on nuclear technology from Romania. The Company also produces CANDU – type nuclear fuel bundles that are used to keep its own nuclear reactors in use.

The Company's eligible activities in terms of the Taxonomy have been identified by examining the economic activities in the Delegated Acts corresponding to the descriptions of the activities of the branches and subsidiaries:

- Activity 4.28. **Electricity generation from nuclear energy in existing installations.** The Cernavoda NPP (Nuclear power plant) subsidiary, located in Cernavoda, ensures the operation of the two operational Nuclear Units, based on the CANDU technology, as well as the management of all SNN

- assets in Cernavoda. This activity generates **98.83%** of SNN's total turnover. The activity is eligible for the environmental objectives Climate change mitigation and Climate change adaptation.
- Activity 4.27. **Construction and safe operation of new nuclear power plants for the production of electricity or heat, including hydrogen production, using best available technologies.** The subsidiary EnergoNuclear, the project company whose mission is to develop the project for the realisation of Units 3 and 4 of Cernavoda NPP (based on CANDU – Canadian Deuterium and Uranium technology), signed in 2021 the first contract for engineering services for the development and updating of the necessary documentation for the start of the CANDU 3 and 4 Units Project.

At this moment, the nuclear units 3 and 4 of the NPP are in various stages of construction, so SNN has not recorded income from this activity, but it will be income – generating after the completion of construction and the start of operation of Units 3 and 4. The activity is eligible for the environmental objectives *Climate change mitigation and Climate change adaptation.*

At the level of all SNN activities, a total percentage of **98.83% meaning RON 5,587,212,177 is considered eligible** for Taxonomy. Detailed information can be found in Table 1 in Section 4 of this report on performance indicators.

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## 2.2. Capital expenditure (CAPEX)



SNN's investments focus on its core activities – nuclear power generation and the construction of new nuclear power plant capacities. Since the Company has relevant activities with turnover eligible for the Taxonomy, eligible CapEx expenditure of type a) have been identified in accordance with Annex I of Delegated Regulation 2021/2178 for all eligible activities listed in section 2.1 of this report.

The eligibility analysis also looked at type c) (according to Delegated Regulation 2021/2178, Annex I, point 1.1.2.2) of CapEx expenditure, which are considered as individual measures and not related to any of the income – generating target activities. Such investments have been identified in the Delegated Regulation to:



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- **7.3. Installation, maintenance and repair of energy efficient equipment** – SNN has ongoing projects for the replacement of some building components and equipment for the operation of buildings and lighting systems with energy efficient ones.
- **7.2 Renovation of existing buildings** – In 2025, a number of major building renovations were completed
- **7.1 Construction of new buildings** - The Company commenced several investment projects aimed at construction of buildings (office spaces and accommodation for its own staff).
- **6.6. Road haulage services** – not associated with an activity identified as eligible, refers to the purchase, leasing or operation of vehicles of categories N1, N2 or N3 minimum EURO VI stage E, for the transportation of goods.

Of the total capital expenditure, a total of **75.28% representing RON 2,429,335,552 is considered eligible** for Taxonomy. Detailed information can be found in Table 2 in Section 4 of this report on performance indicators.

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### 2.3. Operating expenditure (OpEx)















OpEX, as defined in the EU Taxonomy, is limited to *“non-capitalised direct costs related to research and development, building renovation measures, short – term rental, maintenance and repairs and any other direct expenses related to the daily servicing of the assets, properties, plants and equipment by the undertaking or outsourced third party, which are necessary to ensure the continuous and effective operation of those assets”*.

The Company has relevant turnover and CapEx activities eligible for the Taxonomy, therefore, the operational expenditure associated with these activities have been identified as eligible for the Taxonomy. In addition, the analysis of expenditure category c) (in accordance with Delegated Regulation 2021/2178, Annex I, point 1.2.3.2) was carried out, but no such expenditure was identified as material.

Of the total operating expenditure, a total percentage of **97.51% representing RON 144,027,061 is considered eligible** for Taxonomy. Detailed information can be found in Table 3 in Section 4 of this report on performance indicators.



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## 3. Assessment of alignment with the EU Taxonomy for the financial year 2025



An economic activity aligned with the Taxonomy is officially considered environmentally sustainable. The Taxonomy – eligible business activity becomes aligned if additional criteria are met, as mentioned in Article 3

- Criteria for environmentally sustainable economic activities:*
- a. *contributes substantially to one or more of the environmental objectives set out in Article 9 in accordance with Articles 10 to 16;*
  - b. *does not significantly harm any of the environmental objectives set out in Article 9 in accordance with Article 17;*
  - c. *is carried out in accordance with the minimum guarantees provided for in Article 18; and*
  - d. *complies with the technical examination criteria established by the Commission in accordance with Article 10(3), Article 11(3), Article 12(2), Article 13(2), Article 14(2) or Article 15(2) of Delegated Regulation 2020/852.*

The proposed alignment assessment framework consists in assessing each eligible activity in the light of:

1. Compliance with the substantial contribution criteria and, **if compliant,**
2. Compliance with the “do no significant harm” (DNSH) criteria,

all followed by a general assessment of compliance with the minimum social safeguards at Company level.

The 2 eligible activities were analysed:

- Electricity generation from nuclear energy in existing installations (4.28) and
- Construction and safe operation of new nuclear power plants for the production of electricity or heat, including hydrogen production, using best available technologies (4.27)

The alignment analysis found that SNN meets the general criteria for substantial contribution to climate change mitigation, but for FY 2025 the company has not completed the necessary studies to meet the additional criteria for substantial contribution to climate change mitigation.

Thus, it was considered that the 2 activities are eligible under the EU Taxonomy, but not aligned.

Therefore, because the technical criteria mentioned above were not met, the assessment of the alignment of activities did not continue with the analysis of compliance with the criteria of the “no significant harm” principle (DNSH) or with the general assessment of compliance with the minimum social safeguards at Company level.



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### 4. Key Performance Indicators of the EU Taxonomy



By assessing the activity of the SNN against the specific Taxonomy criteria, it was determined that much of this activity is eligible for the objectives Climate Change Mitigation and Climate Change Adaptation.

The calculation of the eligibility ratio for all key indicators was based on the EU Taxonomy specific methodology (EU Delegated Regulation 2021/2139) and the consolidated financial statements prepared under the IFRS reporting system for the financial year 2025.

#### 4.1. Turnover

- **Percentage numerator (turnover) aligned to Taxonomy**
- The numerator accounting for Taxonomy aligned activities is equal to **RON 0.00**.
- The aligned turnover percentage is **0.00%**.
- **Numerator for determining the percentage aligned to the Taxonomy (turnover)**
- The denominator is the total net turnover for the financial year 2025, i.e. RON 5,653,142,332.
- Detailed information can be found in Table 1.1 at the end of Section 4.

#### 4.2. Capital expenditure

- **Taxonomy – aligned percentage numerator (CapEx)**
- The numerator accounting for Taxonomy aligned activities is equal to **RON 0.00**.
- The percentage of aligned activities is **0.00%**.
- **Denominator for determining the percentage aligned to Taxonomy (CapEx)**
- The denominator is composed of the total capital expenditures for FY 2025 – **RON 3,227,080,032**.
- Detailed information can be found in Table 2.1 at the end of Section 4.

#### 4.3. Operating expenditure

- **Taxonomy – aligned percentage numerator (OpEx)**
- The numerator accounting for Taxonomy aligned activities is equal to **RON 0.00**.
- The percentage of aligned activities is **0.00%**.
- **Denominator for determining the percentage aligned to Taxonomy (OpEx)**

In constructing the denominator for operating expenditure in FY 2025, the following categories of expenditure have been included, as defined by OpEx as defined in Commission Delegated Regulation (EU) 2021/2178 of July 6, 2021, section 1.1.3.1:

- Repairs and maintenance
- Expenditure with spare parts
- Research – development and technical support
- NPP nuclear studies and research (research and development)
- Professional training

The denominator thus constructed equals **RON 147,699,732**.

Detailed information can be found in Table 3.1 at the end of Section 4.



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Table 1.1. Share of turnover associated with Taxonomy – aligned business activities in 2025

Financial year 2025	Year 2025			Substantial Contribution Criteria					Criteria related to DNSH (to not cause significant harm) (h)										
	Code (a) (2)	Turnover (3)	Share of turnover, 2025 (4)	Climate change mitigation (5)	Climate change mitigation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Share of taxonomy-aligned (A.1.) or eligible turnover (A.2.), 2024 (18)	Facilitation activity category (19)	Transitional activity category (20)
		RON	%	D; N; N/EL- (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D/N	D/N	D/N	D/N	D/N	D/N	D/N	%	Facilitation-related	Transition-related

**A. ACTIVITIES ELIGIBLE FOR TAXONOMY**

**A.1. Environmentally-sustainable activities (activities aligned to taxonomy)**

Turnover of environmentally-sustainable activities (aligned with taxonomy) [A.1]	0.00	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0.00%		
Of which, facilitation activities	0.00	0.00%								N	N	N	N	N	N	N	0.00%	Facilitation-related	
Of which, transition activities	0.00	0.00%								N	N	N	N	N	N	N	0.00%		Transition-related

**A.2 Taxonomy-eligible, but not environmentally-sustainable activities (activities not aligned to the taxonomy) (g)**

				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
Electricity generation from nuclear energy in existing installations	M 4.28	5,587,212,177	98.83%	EL	EL	N/EL	N/EL	N/EL	N/EL								98.83%		
Turnover of taxonomy-eligible, but not environmentally-sustainable activities (not taxonomy-aligned activities) [A.2]		5,587,212,177	98.83%	98.83%	98.83%	N/EL	N/EL	N/EL	N/EL								98.83%		
A. Turnover from activities eligible for taxonomy [A.1+A.2]		5,587,212,177	98.83%	98.83%	98.83%	N/EL	N/EL	N/EL	N/EL								98.83%		

**B. ACTIVITIES NON-ELIGIBLE FOR TAXONOMY**

Turnover of taxonomy non-eligible activities	65,930,155	1.17%																	
<b>TOTAL</b>	<b>5,653,142,332</b>	<b>100.00%</b>																	

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Table 2.1. CapEx share of Taxonomy – aligned business activities in 2025

Financial year 2025	Year 2025			Substantial Contribution Criteria						Criteria related to DNSH (to not cause significant harm) (h)						Minimum safeguards (17)	Share of taxonomy-aligned (A.1.) or eligible turnover (A.2.), 2024 (18)	Facilitation activity category (19)	Transitional activity category (20)
	Code (a) (2)	CapEx (3)	CapEx share, year 2025 (4)	Climate change mitigation (5)	Climate change mitigation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)				
		RON	%	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D/N	D/N	D/N	D/N	D/N	D/N	D/N	%	Facilitation-related	Transition-related
<b>A. ACTIVITIES ELIGIBLE FOR TAXONOMY</b>																			
<b>A.1. Environmentally-sustainable activities (activities aligned to taxonomy)</b>																			
CapEx of environmentally sustainable activities (aligned to		0.00	0.00%	0.00%	0.00%	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0.00%		
Of which, facilitation activities		0.00	0.00%							N	N	N	N	N	N	N	0.00%	Facilitation-related	
Of which, transition activities		0.00	0.00%							N	N	N	N	N	N	N	0.00%		Transition-related
<b>A.2 Taxonomy-eligible, but not environmentally-sustainable activities (activities not aligned to the taxonomy) (g)</b>																			
				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
Electricity generation from nuclear energy in existing installations	CCM 4.28	1,576,107,262	48.84%	EL	EL	N/EL	N/EL	N/EL	N/EL								84.87%		
Construction and safe operation of new nuclear power plants for the production of electricity or heat, including hydrogen production, using best available technologies	CCM 4.27	850,276,741	26.35%	EL	EL	N/EL	N/EL	N/EL	N/EL								7.06%		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	870,094	0.03%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.11%		
Renovation of existing buildings	CCM 7.2	592,247	0.02%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.00%		
Construction of new buildings	CCM 7.1	1,014,508	0.03%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.00%		
Services of freight transport by road	CCM 6.6	474,700	0.01%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.16%		
<b>CapEx for taxonomy-eligible, but not environmentally-sustainable activities (activities not aligned to the taxonomy) (A.2)</b>		<b>2,429,335,552</b>	<b>75.28%</b>	<b>75.28%</b>	<b>75.28%</b>	<b>N/EL</b>	<b>N/EL</b>	<b>N/EL</b>	<b>N/EL</b>								<b>92.29%</b>		
<b>A. CapEx of activities eligible for taxonomy (A.1+A.2)</b>		<b>2,429,335,552</b>	<b>75.28%</b>	<b>75.28%</b>	<b>75.28%</b>	<b>N/EL</b>	<b>N/EL</b>	<b>N/EL</b>	<b>N/EL</b>								<b>92.29%</b>		
<b>B. ACTIVITIES NON-ELIGIBLE FOR TAXONOMY</b>																			
Taxonomy CapEx - non-eligible activities		797,744,480	24.72%																
TOTAL		3,227,080,032	100.00%																

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Table 3.1. OpEx share of Taxonomy – aligned business activities in 2025

Financial year 2025	Year 2025			Substantial Contribution Criteria						Criteria related to DNSH (to not cause significant harm) (h)						Minimum safeguards (17)	Share of taxonomy-aligned (A.1.) or eligible turnover (A.2.), 2024 (18)	Facilitation activity category (19)	Transitional activity category (20)
	Code (a) (2)	OpEx (3)	Share of OpEx, year 2025 (4)	Climate change mitigation (5)	Climate change mitigation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)				
Economic activities (1)		RON	%	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D; N; N/EL; (b) (c)	D/N	D/N	D/N	D/N	D/N	D/N	D/N	%	Facilitation-related	Transition-related
<b>A. ACTIVITIES ELIGIBLE FOR TAXONOMY</b>																			
<b>A.1. Environmentally-sustainable activities (activities aligned to taxonomy)</b>																			
Turnover of environmentally-sustainable activities (aligned with taxonomy) (A.1)		0.00	0.00%	0.00%	0.00%	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0.00%		
Of which, facilitation activities		0.00	0.00%							N	N	N	N	N	N	N	0.00%	Facilitation-related	
Of which, transition activities		0.00	0.00%							N	N	N	N	N	N	N	0.00%		Transition-related
<b>A.2 Taxonomy-eligible, but not environmentally-sustainable activities (activities not aligned to the taxonomy) (g)</b>																			
				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
Electricity generation from nuclear energy in existing installations	CCM 4.2B	144,027,061	97.51%	EL	EL	N/EL	N/EL	N/EL	N/EL								94.76%		
OpEx for taxonomy-eligible, but not environmentally-sustainable activities (activities not aligned to the taxonomy) (A.2)		144,027,061	97.51%	97.51%	97.51%	N/EL	N/EL	N/EL	N/EL								94.76%		
A. OpEx of activities eligible for taxonomy (A.1+A.2)		144,027,061	97.51%	97.51%	97.51%	N/EL	N/EL	N/EL	N/EL								94.76%		
<b>B. ACTIVITIES NON-ELIGIBLE FOR TAXONOMY</b>																			
Taxonomy OpEx - non-eligible activities		3,672,672	2.49%																
TOTAL		147,699,732	100.00%																

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## 5. Information and key performance indicators on specific nuclear energy activities



Within SNN S.A., activities were identified of production, construction or operation of facilities producing electricity or heat from nuclear sources. In accordance with the Commission Delegated Regulation (EU) 2022/1214 amending Delegated Regulation (EU) 2021/2139 and Delegated Regulation (EU) 2021/2178, specific information need to be disclosed in relation to the Company's business activities, according to Annex XII to this regulation.

### 5.1. Nuclear and fossil gas-related activities

Table 4. Nuclear activities and activities related to fossil gas (Template 1 according to Delegated Regulation (EU) 2022/1214 – Annex XII)

Table Nuclear activities and activities related to fossil gas (Template 1 according to Delegated Regulation (EU) 2022/1214– Annex XII)		
Row	Nuclear and fossil gas related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	<b>The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies</b>	<b>YES</b>
3	<b>The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.</b>	<b>YES</b>
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO



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## 5.2. Taxonomy – aligned business activities

Table 5. KPI Turnover – Taxonomy – aligned business activities (denominator)

KPI – Turnover – Taxonomy-aligned business activities (denominator) (Template 2 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (– CCM)		Climate change adaptation (– CCA)	
		Value	%	Value	%	Value	%
2	Amount and proportion of the taxonomy-aligned economic activity under section 4.27 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
3	Amount and proportion of the taxonomy-aligned economic activity under section 4.28 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>
8	<b>Total applicable KPI – to the total turnover of aligned activities</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>



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Table 6. KPI Turnover – Taxonomy – aligned business activities (numerator)

KPI Turnover – Taxonomy – aligned business activities (numerator) (Template 3 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaptation	
		Value	%	Value	%	Value	%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the numerator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the numerator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>

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Table 7. KPI – CAPEX – Taxonomy – aligned business activities (denominator)

KPI – CAPEX – Taxonomy – aligned business activities (denominator) (Template 2 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + ACC		Climate change mitigation (– CCM)		Climate change adaptation (– CCA)	
		Value	%	Value	%	Value	%
2	Amount and proportion of the taxonomy-aligned economic activity under section 4.27 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
3	Amount and proportion of the taxonomy-aligned economic activity under section 4.28 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>
8	<b>Total applicable KPI – to the total turnover of aligned activities</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>



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Table 8. KPI CAPEX – Taxonomy – aligned business activities (numerator)

KPI CAPEX – Taxonomy – aligned business activities (numerator) (Template 3 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaptation	
		Value	%	Value	%	Value	%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the numerator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the numerator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>

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Table 9. KPI – OPEX – Taxonomy – aligned business activities (denominator)

KPI – OPEX – Taxonomy – aligned business activities (denominator) (Template 2 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + ACC		Climate change mitigation (– CCM)		Climate change adaptation (– CCA)	
		Value	%	Value	%	Value	%
2	Amount and proportion of the taxonomy-aligned economic activity under section 4.27 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
3	Amount and proportion of the taxonomy-aligned economic activity under section 4.28 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>
8	<b>Total applicable KPI – to the total turnover of aligned activities</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>

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Table 10. KPI – OPEX – Taxonomy – aligned business activities (denominator)

KPI OPEX – Taxonomy – aligned business activities (numerator) (Template 3 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaptation	
		Value	%	Value	%	Value	%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the numerator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the numerator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>



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


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### 5.3. Eligible but not aligned business activities

Table 11. Turnover KPI – Taxonomy-eligible, but non-taxonomy-aligned economic activities

Turnover KPI – Taxonomy-eligible, but non-taxonomy-aligned economic activities (Template 4 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaptation	
		Value	%	Value	%	Value	%
2	Amount and proportion of the taxonomy-eligible, but non-taxonomy-aligned economic activity under section 4.27 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
3	Amount and proportion of the taxonomy-eligible, but non-taxonomy-aligned economic activity under section 4.28 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	5,587,212,177	100.00%	5,587,212,177	100.00%	0.00	100.00%
7	<b>Amount and proportion of other taxonomy-eligible, but non-taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	0.00	0.00%	0.00	0.00%	0.00	0.00%
8	<b>Total amount and proportion of taxonomy-eligible, but non-taxonomy-aligned economic activities in the denominator of the applicable key performance indicator</b>	5,587,212,177	100.00%	5,587,212,177	100.00%	0.00	100.00%

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Table 12. CAPEX KPI – Taxonomy-eligible, but non-taxonomy-aligned economic activities

CAPEX KPI – Taxonomy-eligible, but non-taxonomy-aligned economic activities (Template 4 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaptation	
		Value	%	Value	%	Value	%
2	Amount and proportion of the taxonomy-eligible, but non-taxonomy-aligned economic activity under section 4.27 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	850,276,741	35.00%	850,276,741	35.00%	0.00	0.00%
3	Amount and proportion of the taxonomy-eligible, but non-taxonomy-aligned economic activity under section 4.28 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	1,576,107,262	64.88%	1,576,107,262	64.88%	0.00	0.00%
7	Amount and proportion of other taxonomy-eligible, but non-taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator	2,951,549	0.12%	2,951,549	0.12%	0.00	0.00%
8	Total amount and proportion of taxonomy-eligible, but non-taxonomy-aligned economic activities in the denominator of the applicable key performance indicator	2,429,335,552	100.00%	2,429,335,552	100.00%	0.00	0.00%



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Table 13. OPEX KPI – Taxonomy-eligible, but non-taxonomy-aligned economic activities

OPEX KPI – Taxonomy-eligible, but non-taxonomy-aligned economic activities (Template 4 according to Delegated Regulation (EU) 2022/1214 – Annex XII)							
Row	Economic activities	Value and proportion (information is shown as monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation		Climate change adaptation	
		Value	%	Value	%	Value	%
2	Amount and proportion of the taxonomy-eligible, but non-taxonomy-aligned economic activity under section 4.27 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00%	0.00	0.00%	0.00	0.00%
3	Amount and proportion of the taxonomy-eligible, but non-taxonomy-aligned economic activity under section 4.28 of Annexes I and II to the Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	144,027,061	100.00%	144,027,061	100.00%	0.00	0.00%
7	<b>Amount and proportion of other taxonomy-eligible, but non-taxonomy-aligned economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>	<b>0.00</b>	<b>0.00%</b>
8	<b>Total amount and proportion of taxonomy-eligible, but non-taxonomy-aligned economic activities in the denominator of the applicable key performance indicator</b>	<b>144,027,061</b>	<b>100.00%</b>	<b>144,027,061</b>	<b>100.00%</b>	<b>0.00</b>	<b>0.00%</b>



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## 5.4. Taxonomy non-eligible business activities

Table 14

<b>KPI Turnover – Taxonomy-non-eligible business activities</b> (Template 5 according to Delegated Regulation (EU) 2022/1214 – Annex XII)			
Row	Economic activities	Value	Percentage
2	Amount and proportion of the economic activity on <b>row 2 of template 1 that is taxonomy-ineligible under section 4.27</b> of Annexes I and II to the Delegated Regulation 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00
3	Amount and proportion of the economic activity on <b>row 3 of template 1 that is taxonomy-ineligible under section 4.28</b> of Annexes I and II to the Delegated Regulation 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00
7	<b>Amount and proportion of other taxonomy-ineligible economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	65,930,155	1.17%
8	<b>Total amount and proportion of taxonomy-ineligible economic activities in the denominator of the applicable key performance indicator"</b>	65,930,155	1.17%

Table 15.

<b>KPI CAPEX – Taxonomy-non-eligible business activities</b> (Template 5 according to Delegated Regulation (EU) 2022/1214 – Annex XII)			
Row	Economic activities	Value	Percentage
2	Amount and proportion of the economic activity on <b>row 2 of template 1 that is taxonomy-ineligible under section 4.27</b> of Annexes I and II to the Delegated Regulation 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00
3	Amount and proportion of the economic activity on <b>row 3 of template 1 that is taxonomy-ineligible under section 4.28</b> of Annexes I and II to the Delegated Regulation 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00
7	<b>Amount and proportion of other taxonomy-ineligible economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	797,744,480	24.72%
8	<b>Total amount and proportion of taxonomy-ineligible economic activities in the denominator of the applicable key performance indicator"</b>	797,744,480	24.72%

Table 16.

<b>KPI OPEX – Taxonomy-non-eligible business activities</b> (Template 5 according to Delegated Regulation (EU) 2022/1214 – Annex XII)			
Row	Economic activities	Value	Percentage
2	Amount and proportion of the economic activity on <b>row 2 of template 1 that is taxonomy-ineligible under section 4.27</b> of Annexes I and II to the Delegated Regulation 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00
3	Amount and proportion of the economic activity on <b>row 3 of template 1 that is taxonomy-ineligible under section 4.28</b> of Annexes I and II to the Delegated Regulation 2021/2139 in the denominator of the applicable key performance indicator	0.00	0.00
7	<b>Amount and proportion of other taxonomy-ineligible economic activities not listed at rows 1 to 6 above in the denominator of the applicable key performance indicator</b>	3,672,672	2.49%
8	<b>Total amount and proportion of taxonomy-ineligible economic activities in the denominator of the applicable key performance indicator"</b>	3,672,672	2.49%



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Abbreviation	Description
GMS	General Meeting of Shareholders
IAEA	International Atomic Energy Agency
ALARA	“As low as reasonably achievable” – the principle of avoiding exposure to radiation that has no direct benefit to you, even if the dose is low.
AMCI	Management of Conflicts of Interests
ASF	The Financial Supervisory Authority
IEB	Income and expenditure budget
CANDU	“CANada Deuterium Uranium” – the registered trademark for the power reactor developed for several nuclear power plants in Canada.
CapEx	Operating expenditure
CCW	Condenser cooling water
EC	European Commission
CECA	Classification Committee
CFP	Preventive Financial Control
CLU	Liquid fuel for combustion chambers
CNCAN	National Commission for Nuclear Activities Control
(Cernavoda) NPP	Nuclear power plant
CO2	Carbon dioxide
VOC	Volatile Organic Compounds
CSRD	Directive on sustainability reporting by enterprises
OHSC	Occupational Health and Safety Committee
CTRF	Cernavoda Tritium Removal Facility
DAMR	Audit and Risk Management Directorate
DBA	Licensing Design Base Documents
DC	Data Center
DICA	Spent Fuel Storage Facility
EEON	Extreme events of natural origin
EMAS	The EU Eco Management and Audit Scheme
ENSREG	European Nuclear Safety Regulators Group
EOOS	EOOS Risk Monitor



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Abbreviation	Description
EPSN	Probabilistic nuclear safety assessments
EPSN	Emergency Power Supply
ESG	Environment, Social, Governance Areas
ESRS	European Sustainability Reporting Standards
(Pitesti) NFP	Nuclear Fuel Plant
FNTP	Final Notice to Proceed
FPCU (Feldioara)	Fabrica de Prelucrare a Concentratelor de Uraniu
FSAR	Final Safety Analysis Report
GHG	Greenhouse Gas
HTTPS	Hypertext Transfer Protocol Secure – is a protocol that secures communication and data transfer between a user's web browser and a website.
ICN	Institute for Nuclear Research
IRO	Impacts, Risks and Opportunities
ISO	International Organisation for Standardisation
ISU	General Inspectorate for Emergency Situations
IT	Information Technology
IT&C	Information and Communication Technology
kWh	kilo – watt hour
LED	Economical luminaires
LNTP	Limited Notice to Proceed
m <sup>3</sup>	Cubic meter
MACEE	Centralised Electricity Purchase Mechanism
MID	Measuring Instruments Directive
MWh	Mega – watt hour
NCR	Nonconformity Reports
NMR	Radioactive Mining Standards
NRCD	Acceptance and discrepancy note
NSR	Radiological Safety Standards
ODD	Sustainable Development Goals
OECD	Organisation for Economic Co – operation and Development



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Abbreviation	Description
ILO	International Labour Organisation
OP&P	Operating principles and policies
OPCOM	The Romanian Electricity and Gas Market Operator
OpEx	Operational expenditure
OPEX (Process)	Operational expenditure process
OT	Automation technology
GEO	Government Emergency Ordinance
PACI	Partnering Against Corruption Initiative
PC	Computer staff
CM – OTC, CMBC – EA – flex and CMBC – CN	OPCOM organised electricity futures markets
IDM	Intraday market
PSA	Probabilistic Safety Analysis
PSOC	Plant Safety Operating Committee
PV PIF	Commissioning Protocol
PVR	Taking – Over Protocol
PVR MF	Fixed Asset Taking – Over Protocol
DAM	Day – Ahead Market
RATEN	Technologies for Nuclear Energy State Owned Company
RCA	Abnormal conditions reports
RT	Refurbishment
S.A.	Joint – stock company
SCPA	Central Aerosol Sampling System
SDG	Stand – by Diesel Generator
SEN	National Energy System
SIEM	Security event and information management
SMR	Small modular reactors
SNA	National Anti – corruption Policy
SNN	Societatea Nationala Nuclearelectrica SA
SPD	Direct Payments Service



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Abbreviation	Description
SPFIC	The physical and cyber protection system
SPV	Virtual Private Space
OHS	Occupational Health and Safety
T	Quarter
t	tonnes
tCO2e	Tonnes of carbon dioxide equivalent
U1, U2, U3 or U4	Units 1, 2, 3 or 4 (of Cernavoda NPP)
EU	European Union
UN	United Nations
URL	Web address (Uniform Resource Location)
WBCSD	World Business Council for Sustainable Development
WENRA	Association of Western European Nuclear Regulators
WGB	OECD Anti-Bribery Working Group
WRI	World Resources Institute



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 We generate clean energy at standards of excellence

**SNNVISION**  
 We build a sustainable future for tomorrow's generation

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- PROFESSIONAL EXCELLENCE
- CARE FOR EMPLOYEES
- EMPATHY AND RESPONSIBILITY
- SUSTAINABLE DEVELOPMENT

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