

-  MESSAGE FROM THE CEO
-  FUNDAMENTAL VALUES
-  NUCLEAR SAFETY CULTURE
-  CODE OF CONDUCT
-  APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE
-  AVOIDING CONFLICTS OF INTEREST
-  IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY
-  INTERNATIONAL SANCTIONS
-  COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA
-  REPORTING IRREGULARITIES

S.N. Nuclearelectrica S.A.

Code of Business Ethics and Conduct 2025

Dear Colleagues,

The Code of Ethics and Business Conduct reflects the core values of our organization and our shared commitment to excellence, transparency and ethics.

We are committed to building an organizational culture based on solid principles and values to guide us in our daily work. Integrity, professionalism, responsibility, respect and loyalty are essential benchmarks of our conduct, principles that define how we collaborate, make decisions and relate to colleagues, partners and the community.

This document is not just a collection of rules, but an expression of our organizational culture. It sets the standards of behaviour expected of all team members, regardless of their role or hierarchical level. By complying with these principles, we contribute to building a climate of trust, collaboration and mutual respect.

The Code covers a wide range of issues, from interpersonal relations and professional communication to managing conflicts of interest, confidentiality of information and social responsibility. Each section is designed to provide clarity and support for ethical decision-making.

It is important to emphasize that this Code does not replace personal judgment, but complements it. We encourage colleagues to reflect on their own actions and seek support when faced with moral or professional dilemmas.

Compliance with the Code of Ethics is an individual responsibility, but also a collective commitment. Each of us has an essential role in maintaining a fair, safe and inclusive working environment. Therefore, we encourage you to read this document, understand it and apply it in your daily work.

If you have any questions or concerns, we encourage you to discuss them openly with your line managers, compliance officers or the human resources department. Transparency and open communication are essential to prevent and resolve any non-compliant situations.

This Code contributes to strengthening an organizational culture based on trust, respect and accountability and is a commitment to ourselves, our colleagues and our partners.

Cosmin Ghita
CEO

S.N. Nuclearelectrica SA



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES



FUNDAMENTAL VALUES

Regardless of our position in the company, each of us contributes directly to SNN's image, performance and reputation.

How we act, communicate and interact defines organizational culture and sets the standards for a healthy, responsible and inclusive work environment. This Code of Ethics and Business Conduct, applicable to all members of the management, employees, consultants, staff of partners who carry out their activity within SNN, providing clear benchmarks on fundamental values and ethical behaviour that must be undertaken and constantly observed, to promote the adoption of a correct attitude for a prosperous business, based on sound principles, integrity and transparency.

The core values reflect our shared commitments and are the essential pillars underpinning the vision, organizational culture and professional responsibility of each of us:

SAFETY AND SUSTAINABILITY - We are all responsible for nuclear safety - our priority! Team, public and environmental safety, alongside operational safety and sustainability, come first for each of us, irrespective on the position we hold. Our Nuclear Safety Culture relies on WANO PL 2013 – 1 standards.

BUSINESS EXCELLENCE –Together, we are a Nucleus of Excellence! In everything we do, we set ambitious standards and aim to achieve and sustainably maintain the highest performance standards. Our performance and continuous improvement culture complies with the

WANO/INPO standards - Staying on Top, INPO 19-003.

CARE FOR OUR EMPLOYEES – each and every colleague is a valuable member of the team and each colleague brings an important contribution to the success of the organisation. We offer appreciation and recognition for excellence-level results.

We comply with the WANO/INPO standards - Staying on Top, INPO 19-003, including with those relating to Leadership and Talent Development, Continuous Learning, Self-awareness and Self-correction.

EMPATHY AND RESPONSIBILITY – Together, we are a Nucleus of Care! We support the communities in which we operate! We contribute substantially through socially responsible projects targeting the education, healthcare and social/environmental sectors. We comply with the ESG (environmental, social and governance) principles and with the sustainability goals of the United Nations, as Nuclearelectrica has been affiliated to United Nations Global Compact starting with 2021.

SUSTAINABLE DEVELOPMENT – Everything we do today impacts the future. This is precisely why we comply with the WANO/INPO standards - Staying on Top, INPO 19-003, including in terms of setting and promoting strategic directions.



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF INTEREST



IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



REPORTING IRREGULARITIES



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

Mutual respect at work

In Nuclearelectrica, we always show the respect we pay to all the colleagues and the parties we interact with. In our daily activity, we interact with people of different ethnicities, cultures, religions, political beliefs, ages or gender, as well as with people with disabilities or of different sexual orientations. The diversity of our staff is one of our greatest assets as it allows us to benefit from a variety of professional and educational knowledge and points of view. Integration of these differences helps increase our agility and ability to adequately respond to the changes taking place in our business environment and allows us to work more cooperatively.

Staff diversity

We are all entitled to personal dignity, privacy and respect for our rights and have zero tolerance for behaviour or actions that lead to discrimination, harassment or violence.

Moral and sexual harassment

Both in internal relations and in relations with external partners, we avoid any form of harassment, action, conduct or behaviour that may lead to discrediting, isolating, humiliating, offending, intimidating, threatening a person, deteriorating working conditions, self-respect or respect for life. At the same time, we avoid any situation of sexual harassment manifested by unwanted behaviour with sexual connotation, expressed physically, verbally or nonverbally, having as purpose or effect the

damage of a person's dignity and, in particular, the creation of an intimidating, hostile, degrading, humiliating or offensive environment. Nuclearelectrica will apply a zero-tolerance policy for sexual harassment and for moral harassment in the workplace, will treat all such incidents seriously and promptly and investigates all allegations of harassment.

Non-discrimination and non-stigmatization

We adopt an impartial attitude towards colleagues and other people with whom we come into contact, respecting the interests and beliefs of all, regardless of race, ethnicity, age, disability, religion, culture, gender, political beliefs or any other criteria. At the same time, we avoid that, through contemptuous gestures, offensive or discrediting expressions, rumours, criticism of private life, insults, slander, use of obscene words, reproaches or threats, we damage the dignity of colleagues or external work and dialogue partners.

Objectivity in evaluation

In the exercise of specific management duties, Nuclearelectrica's management staff has the obligation to ensure equal opportunities and equal treatment regarding career development in the company in which they work, for the subordinate staff. The management staff has the obligation to examine and apply objectively the criteria for evaluating the professional competence of the subordinate staff, when proposing or approving promotions, transfers,



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

appointments or dismissals or granting material or moral incentives, excluding any form of favouritism or discrimination. It is forbidden for the management staff to favour or disfavour access or promotion in any position on discriminatory, kinship, affinity or other criteria that are inconsistent with the principles of ethical conduct.



-  MESSAGE FROM THE CEO
-  FUNDAMENTAL VALUES
-  NUCLEAR SAFETY CULTURE
-  CODE OF CONDUCT
-  APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE
-  AVOIDING CONFLICTS OF INTEREST
-  IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY
-  INTERNATIONAL SANCTIONS
-  COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA
-  REPORTING IRREGULARITIES



NUCLEAR SAFETY CULTURE



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

Each employee of Nuclearelectrica is responsible for nuclear safety by: knowing how one's own activity affects the main nuclear safety functions, applying the necessary means and methods to prevent events, as well as those necessary to mitigate their consequences; and reporting abnormal conditions so that they can be corrected.

Nuclearelectrica's commitment to nuclear safety addresses three major directions: personal responsibility, leadership responsibility and management systems.

PERSONAL RESPONSIBILITY

- **Personal responsibility** means that we assume and understand the importance of adhering to nuclear safety standards. All organization levels are responsible for failure to meet these standards. At individual and team level, we all apply processes and communicate, putting nuclear safety first.
- **The interrogative attitude** has a primary role and is declined in the following behaviours. We don't settle for less. We constantly question conditions, assumptions, anomalies and activities to identify discrepancies, errors and inappropriate actions. Each of us is an observer and corrector of conditions that may affect nuclear safety.
- **Communicate safety issues** - Leaders prioritize communicating nuclear safety issues in teams and support communication across all entities in the company.

LEADERSHIP RESPONSIBILITY

- **Promoting nuclear safety** - Leaders demonstrate commitment to nuclear safety through their decisions and behaviour. Leaders are active and

consistent advocates of nuclear safety, and corporate policies reflect this.

- **Decision-making process** - Decisions that support or affect nuclear safety are systematic, rigorous and comprehensive.
- **Respect-based work environment** - Trust and respect within the team are fundamental to the organization and the nuclear safety culture. Leaders establish a high level of trust throughout the company, maintained through a constant communication process, encouraging diverse opinions.

MANAGEMENT SYSTEMS

- **Continuous learning** - Continuous learning opportunities are valued, identified and implemented. Operating experience is highly valued and the ability to learn from experience is well developed. Self-assessments, training and benchmarking are used to stimulate learning and improve performance.
- **Problem identification and resolution** - Problems that may impact nuclear safety are promptly identified, fully assessed and corrected, a process designed to enhance nuclear safety.
- **Maintaining an open environment that encourages raising issues** - Employees should feel free to raise nuclear safety issues without fear of repercussions, intimidation, discrimination.
- **Rigorous compliance with work**



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

processes and approved procedures

involves planning and controlling activities

to maintain a high level of nuclear safety.



-  MESSAGE FROM THE CEO
-  FUNDAMENTAL VALUES
-  NUCLEAR SAFETY CULTURE
-  CODE OF CONDUCT
-  APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE
-  AVOIDING CONFLICTS OF INTEREST
-  IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY
-  INTERNATIONAL SANCTIONS
-  COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA
-  REPORTING IRREGULARITIES



CODE OF CONDUCT

-  MESSAGE FROM THE CEO
-  FUNDAMENTAL VALUES
-  NUCLEAR SAFETY CULTURE
-  CODE OF CONDUCT
-  APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE
-  AVOIDING CONFLICTS OF INTEREST
-  IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY
-  INTERNATIONAL SANCTIONS
-  COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA
-  REPORTING IRREGULARITIES

The nuclear employee's Code of Conduct provides advice on ethics and professional conduct for all persons employed in the company on the basis of an individual employment contract, as well as for employees of companies that have contractual relations with Nuclearelectrica, during the performance of activities in the company's units.

The basic principle of the Code of Conduct is that employees must act towards Nuclearelectrica with loyalty, honesty, independence, impartiality, discretion and must not put their own interests above the interests of the company, must respect the standards of professional ethics and avoid any situation that could generate a conflict of interest.

The main rules to be observed by the company's staff and its partners concern:

Equal treatment/non-discrimination

Employees must avoid any form of discrimination on grounds of sex, age, physical disability, race, ethnic or social origin, language, political affiliation, property or religious beliefs. Employees have the right to free choice of profession, eliminating all forms of forced and compulsory labour.

Combating moral and sexual harassment

Both in internal relations and in relations with external partners, any form of moral harassment that may lead to discrediting, isolating, humiliating, slandering, intimidating, threatening a person, deteriorating working conditions, self-respect or respect for life, is prohibited. At the same time, any situation of sexual harassment manifested by unwanted behaviour with sexual connotation, expressed physically, verbally or nonverbally, having as purpose or effect the damage of a person's dignity and, in particular, the creation of an

intimidating, hostile, degrading, humiliating or offensive environment, is prohibited.

Nuclearelectrica will apply a zero-tolerance policy for sexual harassment and for moral harassment in the workplace, will treat all such incidents seriously and promptly and investigates all allegations of harassment. Within Nuclearelectrica, disciplinary action will be taken against any person found to have harassed another person, up to and including termination.

Kindness and respect

Employees must be polite and respectful towards colleagues, subordinates, line managers and third parties outside the company. At work, they must avoid behaviour that could create an atmosphere of hostility or intimidation. The quality of information exchange and communication between employees is a central element of social dialog within the company.

Freedom of expression

Employees have the right to express themselves freely, in particular for the improvement of their working environment, with the obligation to report potential violations of labour law and occupational health and safety legislation or potential labour conflicts.

Nuclearelectrica recognizes the right of employees to form trade union organizations



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF INTEREST



IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



REPORTING IRREGULARITIES



according to their choice and/or other forms of representation, according to the laws and regulations in force. Nuclearelectrica undertakes not to exercise any form of discrimination against union members and leaders.

Professionalism

Employees have the obligation to fulfil their duties with responsibility, competence, efficiency, promptness, correctness. They are also responsible for the fulfilment of their work duties to the immediate supervisor and to the hierarchical superior.

Taking into account the specificity of its activities and the need to capitalize on know-how in order to ensure the fulfilment of the company's programs, Nuclearelectrica encourages all employees to be actively involved in the design of their professional development and is committed to ensuring equal opportunities for professional development and mobility. Also, Nuclearelectrica is committed to allow each employee to have access, throughout his/her career, to the necessary training actions to exercise his/her profession in good conditions and to realize the individual career plan.

Integrity

Each employee of Nuclearelectrica will avoid situations likely to create doubts about his/her integrity, primarily conflict of interest.

Integrity involves:

- consistent alignment and respect for common values, principles and ethical norms to support and prioritize Nuclearelectrica's interest over private interests;
- results, ethical behaviour and fairness towards colleagues and superiors;
- contribution to improving the company's image, internally and externally;
- independence and objectivity in formulating and implementing Nuclearelectrica's policies;
- compliance with established tasks/commitments;
- respect for professional secrecy;
- respecting the economic and financial interests of Nuclearelectrica, in internal and external relations;
- performing duties with honesty, good faith and moral integrity.

LAWFULNESS

The employees shall comply with the legislation in force, the Internal Regulations, the Collective Bargaining Agreement of Nuclearelectrica, as well as other normative acts and regulations regarding their own activity and the company's company.

Loyalty

Employees have the obligation to be loyal to Nuclearelectrica, defending its interests in all



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF INTEREST



IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



REPORTING IRREGULARITIES



aspects related to the fulfilment of their professional duties, both inside and outside the company. Employees are required to refrain from any act or deed that may harm the image or legal interests of Nuclearelectrica.

Additional aspects can be found in the Code of Conduct of nuclear employees, which lists the rules of conduct and behaviour during and outside working hours, the obligations and responsibilities of the personnel, including with regard to the security of handled information, the framework in which the internal and external relations of the company are carried out, the way of reporting and examining the violation of the provisions of the code and implementing corrective actions.



-  MESSAGE FROM THE CEO
-  FUNDAMENTAL VALUES
-  NUCLEAR SAFETY CULTURE
-  CODE OF CONDUCT
-  APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE
-  AVOIDING CONFLICTS OF INTEREST
-  IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY
-  INTERNATIONAL SANCTIONS
-  COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA
-  REPORTING IRREGULARITIES

APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE

-  MESSAGE FROM THE CEO
-  FUNDAMENTAL VALUES
-  NUCLEAR SAFETY CULTURE
-  CODE OF CONDUCT
-  APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE
-  AVOIDING CONFLICTS OF INTEREST
-  IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY
-  INTERNATIONAL SANCTIONS
-  COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA
-  REPORTING IRREGULARITIES

The activity we carry out must be in full compliance with the law, by prohibiting any behaviour that deviates from it, from the principles and rules established by Nuclearelectrica or to which the company has adhered.

Nuclearelectrica complies with good business practices and anti-competitive practices, and hidden agreements with third parties for arbitrary fixing of prices, terms or conditions, limiting competition or dividing customers, directing tenders to different bidders by setting arbitrary or restrictive criteria are strictly forbidden.

1. ANTI-FRAUD POLICY AND ETHICS AND COMPLIANCE PROGRAM

Nuclearelectrica is committed to creating and maintaining an honest and open working environment, where people have the confidence to express their ideas without fear of repercussions. All company personnel, including management structures, are required to unconditionally comply with internal procedures, the legal rules in force and to have an impeccable moral conduct.

Fraud is defined as the unlawful action (act, omission, inaccurate statement, misrepresentation), whether committed knowingly or by negligence, characterised by deception, forgery or breach of partners' trust, involving the participation of persons from within and/or from outside the Company, with the intent to exploit the organisational

deficiencies and obtain money, products, services, personal business advantages, to evade obligations or to cause damage or financial loss to the Company.

Fraud may include any infringement of the provisions relating to the capital market, of the legislation or of internal instructions, by bodies, employees or third parties, to the extent such infringement may have financial consequences for Nuclearelectrica.

In certain cases, fraud may be also accompanied by other forbidden practices, such as hidden, prior covenants between the parties or pressures exerted via different channels (inside or outside the Company) in view of accepting unfavourable clauses/terms, including corruption.

Nuclearelectrica is committed to carry out its activity with integrity and prohibits corruption and bribery in any form. We must not directly or indirectly accept, solicit, offer, promise, grant or authorize, directly or indirectly, a bribe, reward, payment or any other attempt to offer an inducement (gifts, banquets, employment, contracts or advantages/benefits of any kind) from or to third parties to influence or appear to influence certain actions, lack of actions or decisions, for the purpose of improperly obtaining an advantage, maintaining a business interest or obtaining undue influence over the actions of that third party.



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

All contracts signed by Nuclearelectrica with business partners include clauses that require compliance by business partners with the anti-corruption commitments undertaken by Nuclearelectrica and that allow the termination of the business relationship, in whole or in part, when it is known or there are reasonable suspicions that the partner is involved in acts of corruption. Nuclearelectrica's business partners are subject to a risk assessment of the anti-corruption compliance system in order to minimize the risks generated by the transactions performed.

The Anti-Fraud Office is responsible for investigating suspicions of fraud, and the Ethics and Integrity Service is responsible for investigating suspicions of violation of the Anti-Corruption Policy, which may cooperate with other directorates/departments/services within Nuclearelectrica.

Nuclearelectrica values the integrity of its employees and recognizes their key role in preventing, detecting and reporting fraud. Consequently, employees are asked to be vigilant at all times and to report any problems as quickly as possible to the following e-mail addresses **sesizari@nuclearelectrica.ro** or **conformitate@nuclearelectrica.ro**.

Additional aspects can be found in the Policy on Anti-Fraud Activity within Societatea Nationala Nuclearelectrica SA, code: AF-00-01, respectively

in the Anti-Corruption Policy of N.S. Nuclearelectrica S.A., code: AC-00-01, Procedure Compliance with the Anti-Corruption Policy, code: AC-00-02, Procedure Implementation of Anti-Corruption, Financial and Non-Financial Controls within the S.N. Nuclearelectrica SA, code: AC-00-03 and Procedure Evaluation of Business Partners of S.N. Nuclearelectrica S.A. from the perspective of the risks associated with the anti-corruption compliance system, code: AC-00-04.

2. GIFTS AND HOSPITALITY

Accepting or giving benefits in a broad sense (gifts, meals, invitations to events, etc.) are allowed within Nuclearelectrica, but are strictly regulated, so that these actions are not illegal, indecent, offensive. Acceptance and granting of benefits is subject

to rules designed to protect the Company against ethical infringements and any other non-compliance that could cause reputational, business, or financial damage or give rise to legal sanctions, adversely affecting the organisation's reputation and profitability, on short- and also on long-term.

Irrespective of the nature and value of the benefit, the forbidden practices are:

- Employees must never explicitly request any benefit from a business partner in close connection with their official duties, or give the impression to a business partner that they expect to be granted a benefit;
- Benefits should not be accepted if delivered by a business partner to the personal address of an employee. Such benefits must be immediately returned;
- No benefits must be accepted where the employee knows or anticipates that the business partner, via de offer or promise to offer a benefit, expects or hopes for a preferential treatment in close connection with business decision-making or official action;
- Benefits must not be accepted if, in the unbiased opinion of a third party, the nature and value of the benefit and the time it is granted or promised might raise suspicion of a business decision or official action having been influenced.



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF INTEREST



IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



REPORTING IRREGULARITIES

As to the granting of benefits, such benefits must fall within the ordinary business limits and comply with the requirements listed below:

- Business partners must not be promised, offered or granted any benefits of any kind in relation to their function if they have previously explicitly requested benefits or have implied that they expect to be granted benefits,
- The benefits shall be delivered to the recipient's company address (in the case of business partners operating in the private or public sector),
- Business partners must not be offered, promised or granted benefits for the purpose of influencing a business decision or an official action in Nuclearelectrica's favour, nor with the expectation or hope for such influence,
- Business partners must not be promised, offered or granted benefits in violation of the business partner's internal regulations / rules / policies. In case of doubt, the Nuclearelectrica's employee must conduct adequate checks prior to launching an invitation. This requirement shall be valid specifically when benefits are granted to public sector employees.
- Business partners must not be offered, promised or granted benefits if their nature, value and planning could be interpreted by an impartial third party as a non-legitimate influence onto a business

decision or an official action.

In conclusion, benefits may be received/granted if these activities are carried out in an honest and transparent manner, their frequency does not create suspicions of conflicts of interest and do not represent cases of breach of professional ethics, are of reasonable value and are not the result of expectations of influencing business decisions. Employees are required to notify the line manager immediately and without delay of any attempt by business partners to illegitimately influence business decisions by promising or granting illegitimate benefits. Also, if an employee wishes to report an incident of improper influence in relation to his/her colleague or line manager, then he/she should report the incident to the Ethics and Integrity Service. In all these cases, one can also use the communication channel **sesizari@nuclearelectrica.ro** or **conformitate@nuclearelectrica.ro**.

The conditions under which benefits can be received/granted by Nuclearelectrica's staff are regulated in the Procedure regarding the granting and acceptance of benefits within Societatea Nationala Nuclearelectrica S.A., code: AF - 00 - 03.

3. INFORMATION SECURITY

The information to which we have access by virtue of our job duties must be protected and treated responsibly, especially in the context in which its unauthorized or accidental disclosure can generate major negative effects at company level, both legally and reputationally.

Certain categories of information, especially confidential, privileged or secret information within the company must not be compromised in any way and must be protected responsibly by all personnel against damage and unauthorized access.

These categories of information concern, but are not limited to, financial results, business plans, technical information and design results, intellectual property and



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

personal information. It is mandatory to:

- protect the personal information, confidential information, privileged information and intellectual property of Nuclearelectrica;
- protect company's assets as if they were your own;
- ensure that assets are maintained to an appropriate standard and are not misused.

You must never:

- disclose confidential information and privileged information of the company to other persons outside the company;
- use or access confidential information, privileged information or intellectual property belonging to customers, competitors, business partners or former employees, without their written approval or to obtain an unfair advantage;
- access or store inappropriate information, data or images using company equipment;
- fail to report theft, damage or misuse of information.

The Company provides its employees with the electronic resources necessary to carry out their work, including e-mail addresses, information systems and electronic equipment, software programs, Internet and network access.

All electronic communications related to professional activities must be made through the work e-mail addresses, and the use of

personal e-mail addresses for this purpose is forbidden.

Any documents containing at least one piece of confidential information are considered confidential. Privileged information is defined by specific capital market legislation (e.g.: Law no. 24/2017 regarding issuers of financial instruments and market operations).

4.
**INVOLVEMENT IN
SUPPORTING THE
COMMUNITY,
DONATIONS AND
SPONSORSHIPS**

These activities are aimed at increasing the prestige and promoting the company's image, improving living conditions in the communities supported, establishing and using objective criteria and transparent rules in the evaluation and selection of eligible projects.

Nuclearelectrica SA has developed a social

responsibility platform, which follows the company's strategic directions and vision to build a sustainable future for the next generation, through the major investment projects it carries out, which will significantly increase the positive impact of the company in Romania and regionally, through the team working to the highest standards of professional excellence, nuclear safety and security, through care for employees, responsibility towards the environment and empathy towards communities in need of support.

In accordance with the company's corporate social responsibility policy, SNN will grant sponsorships/donations in the following areas:

- Actions dedicated to students in the nuclear, energy and technical field, in particular and to young people in general, such as participation in contests and knowledge Olympics, exhibitions of creations and inventions, etc.;
- Actions aimed at supporting development of local communities, in particular from the Cernavoda, Pitesti, Feldioara and Doicești areas, and at improving the living conditions therein, smoothing the access to quality medical care, helping the disadvantaged categories of population, providing opportunities for youth education and acquisition of skills, increasing the number and the quality of



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

- green areas, etc.;
- Active participation in organizations that promote sustainable public policies in the economic, energetic, social, cultural fields, such as professional associations, institutes, resource centres, etc.;
- Cultural and educational actions aimed at facilitating public access to culture and personal development, supporting artistic works and performances, etc.;
- Humanitarian actions intended to help segments of the population affected by natural disasters or individual cases of people with disabilities through relevant associations, actions intended in particular for elderly and children.

Sponsorship/donations are prohibited in the following situations:

- mutual sponsorships between natural or legal persons;
- sponsorships made to relatives up to and including the fourth degree of the members of the Board of Directors and executive management of Nuclearelectrica;
- sponsorship to non-profit legal persons by another legal person that directly manages or controls the sponsored legal person;
- political parties or organizations whose activity is assimilated to a political party.

The sponsorship contracts include a clause that allows SNN to verify the implementation of the project by the sponsorship beneficiary, with

prior notice to the beneficiary, as well as anti-bribery/anti-corruption clauses, and the refusal to sign these clauses leads to non-renewal of the sponsorship contract.

The conditions under which sponsorship/donations can be made by Nuclearelectrica are regulated in the Procedure on granting sponsorships by Societatea Nationala Nuclearelectrica SA, code: RC - 00 - 05.



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF INTEREST



IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



REPORTING IRREGULARITIES

AVOIDING CONFLICTS OF INTEREST



Employees must perform their duties in a manner that best reflects the company's interests. In any situation where the employees' ability to fulfil their responsibilities can be affected by their personal interests or personal considerations, there is the possibility of conflicts of interest.

In this respect, the main situations to avoid are:

- satisfying the interest of a member of the employee's family, a close member of his/her family or of a business firm with which the family is associated or from which he/she has benefits to the detriment of Nuclearelectrica's interest or of the applicable general rules;
- the use, for personal gain, of information, data or documents which are declared solely for the use of Nuclearelectrica and which: are not intended for the public, have been obtained during the period of employment or collaboration with Nuclearelectrica, are confidential or are the intellectual property of Nuclearelectrica or of a third-party supplier of Nuclearelectrica.
- the use of the position, confidential information, working time or facilities for personal gain.

Additional aspects can be found in both the



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES



Code of Conduct for Nuclear Employees and
the *Procedure of Identifying, Assessing and
Preventing Conflicts of Interest*, code: AC-00-05.



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY

Nuclearelectrica has also adhered to the fundamental values, principles, objectives and monitoring mechanism of the 2021-2025 National Anti-Corruption Strategy and, to this effect, it firmly expressed its decision

to:

- condemn corruption in all its forms and to express its commitment to fight this phenomenon by all legal means available to it;
- undertake corruption prevention measures as elements of management plans and to evaluate them periodically as an integral part of administrative performance in order to enhance institutional integrity;



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF INTEREST



IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



REPORTING IRREGULARITIES

- support and promote the implementation of the anti-corruption legislative framework which aims mainly at preventing corruption, increasing anti-corruption education, fighting corruption through administrative measures, approving integrity plans and developing their monitoring and evaluation system;
- strengthen the operational autonomy of the internal control and audit structures and to intensify the implementation of

- internal/managerial control systems;
- periodically self-assess the degree of implementation of mandatory preventive measures;
- adopt all necessary measures to avoid situations of conflict of interest and incompatibilities, as well as to consider the public interest above any other interest, in accordance with the principle of transparency of the decision-making process and unrestricted access to

information of public interest.

Nuclearelectrica has implemented the ISO 37001 anti-bribery management system, being certified in this regard since 2020 and in 2021, it joined the PACI (Partnering Against Corruption Initiative) platform of the World Economic Forum, thus supporting the firm commitment to fight corruption in all its forms.



-  MESSAGE FROM THE CEO
-  FUNDAMENTAL VALUES
-  NUCLEAR SAFETY CULTURE
-  CODE OF CONDUCT
-  APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE
-  AVOIDING CONFLICTS OF INTEREST
-  IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY
-  INTERNATIONAL SANCTIONS
-  COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA
-  REPORTING IRREGULARITIES



INTERNATIONAL SANCTIONS

Nuclearelectrica complies with all legal requirements regarding international sanctions (restrictive measures) applicable to its operations.

SNN has implemented and maintains internal procedural mechanisms to ensure compliance with the legislation on mandatory international sanctions by developing and maintaining an internal operational flow for managing the verification and investigation of the presence in the lists of mandatory international sanctions when entering into relationships/transactions with third party entities, including in the process of qualification of suppliers, periodic verification of presence in the lists of international sanctions, inclusion of contractual clauses on compliance with the legal framework applicable to international sanctions.



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

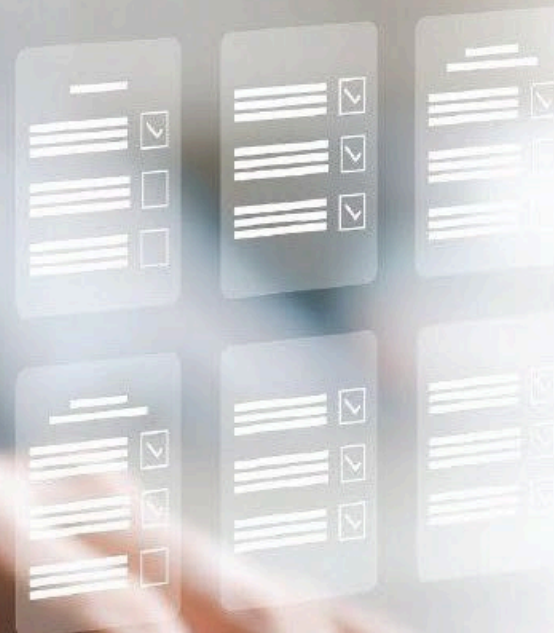


Username

Password

Remember me

Login



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

In accordance with the principles established by the European Regulation 2016/679 regarding the processing of personal data, Nuclearelectrica implements the following principles regarding personal data. Thus, your personal data:

- are processed lawfully, fairly and transparently in relation to you ("lawfulness, fairness and transparency");
- are collected for specified, explicit and legitimate purposes and are not further processed in a way incompatible with those purposes;
- further processing for purposes of public interest archiving, for scientific or historical research purposes or for statistical purposes is not considered incompatible with the original purposes ("purpose limitation").

Personal data may be processed only for the purpose for which it was originally collected. Further changes to the purpose are only possible to a limited extent. Such changes may take place on the basis of a contractual agreement with you, collective agreements, your consent or national law.

How are your rights protected?

Nuclearelectrica, in carrying out its business, must collect and use certain information about natural/legal persons such as customers, suppliers, business contacts, employees, their relatives, visitors, staff of authorities or professional organizations and other persons

with whom the organization has a relationship or may need to contact.

By defining and implementing appropriate technical and organizational measures, Nuclearelectrica ensures:

- Compliance with the Data Protection Regulation and best practices,
- The security of personal data throughout their management by Nuclearelectrica,
- That personal data is not transferred outside the country and/or the European Union without the existence of adequate safeguards, compliance with mandatory corporate rules and/or the existence of legitimate interests,
- Protection of the rights of staff, customers, shareholders and partners,
- Protect against the risks associated with a Data Breach.

The rules apply whether the data is stored electronically, in paper format or on other media. Personal information is processed lawfully.

Who has access to your personal data?

The only persons able to access the data covered by this policy are those who need it for their professional activity. Data is not distributed informally, either internally or outside the organization. When access to personal data is necessary, employees may request it from their hierarchical superiors.

Nuclearelectrica provides training to all employees to help them understand their responsibilities when managing personal data. Employees will keep all data secure, taking technical and/or organizational protection measures.

The data will be reviewed and updated periodically, if it is found to be out of date. If they are no longer needed, they are deleted and discarded.

Personal data storage

Whether the data is stored on paper or electronically, it is stored in a secure place where unauthorized persons cannot see and/or access it and is protected against unauthorized access or accidental deletion.

Any clarifications or queries on this subject can be obtained by correspondence at dpo@nuclearelectrica.ro, and the detailed regulations regarding the protection of personal data can be consulted in the *General Procedure for the protection of personal data in S.N. Nuclearelectrica SA, code: GDPR-00-01 rev. 0 Procedure for Response to Personal Data Security Breaches, code: GDPR-00-02 rev.0, Procedure of Processing the Personal Data of SNN Staff, code: GDPR-00-03 rev.0.*



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF INTEREST



IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



REPORTING IRREGULARITIES



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES



REPORTING IRREGULARITIES AND PROTECTION OF WHISTLEBLOWERS IN THE PUBLIC INTEREST



NUCLEARELECTRICA



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF
INTEREST



IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA



REPORTING IRREGULARITIES

Nuclearelectrica treats seriously reports concerning all issues that may constitute irregularities. Without this description being limitative, the main irregularities which should be prompted reported refer to: non-compliance with the Code of 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 company assumes that all issues and reports submitted are made in good faith and are real/legitimate, in the sense in which it 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 victimization.

Recognizing the essential importance of a clear and up-to-date process for both internal reporting and protection of people who submit reports. Nuclearelectrica has put in place different communication channels that can be used by employees and third parties to voice their complaints, as follows:

- on the home page at **www.nuclearelectrica.ro** under the heading "Integrity Whistleblower", where the Irregularity Reporting Form is available;
- intranet portal section "Integrity Whistleblower";
- the e-mail addresses **sesizari@nuclearelectrica.ro** and **conformitate@nuclearelectrica.ro** managed by the Ethics and Integrity Service;
- Nuclearelectrica's postal address in Bulevardul Iancu de Hunedoara, Nr. 48, sector 1, Bucharest;
- designated compliance representatives from Nuclearelectrica.

All reports received are carefully investigated, in full secrecy and confidentiality, and Nuclearelectrica will take all necessary measures to ensure that persons who have provided information in good faith will not be subject to any personal, professional or financial disadvantage.

When irregularities are reported, any person

can assume that only the employees investigating the complaint 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.

All disclosures are treated similarly to the confidential and sensitive information. 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.

The people who make the complaints can remain anonymous, but they are encouraged to identify themselves (name and contact details), particularly if an additional investigation is needed.

Where, having conducted investigations, elements are identified which could constitute criminal offence, Nuclearelectrica is required by law to refer the matter to the governmental authorities (such as the criminal investigation and prosecution bodies).

Additional aspects regarding the reporting of irregularities can be consulted in the *Procedure on Reporting Irregularities and Protection of Whistleblowers in the Public Interest within Societatea Nationala „Nuclearelectrica” S.A. S.A., code: AF-00-02.*



MESSAGE FROM THE CEO



FUNDAMENTAL VALUES



NUCLEAR SAFETY CULTURE



CODE OF CONDUCT



APPLICATION OF APPROPRIATE BUSINESS PRACTICES AND COMPLIANCE



AVOIDING CONFLICTS OF INTEREST



IMPLEMENTING THE MEASURES OF THE NATIONAL ANTI-CORRUPTION STRATEGY



INTERNATIONAL SANCTIONS



COMPLIANCE WITH THE CONFIDENTIALITY OF PERSONAL DATA



REPORTING IRREGULARITIES

MISSION OF SNN
We generate clean
energy at standards
of excellence

VISION OF SNN
We are building a
sustainable future
for tomorrow's
generation

PROFESSIONAL EXCELLENCE
CARE FOR EMPLOYEES
SAFETY AND SUSTAINABILITY
EMPATHY AND RESPONSIBILITY
SUSTAINABLE DEVELOPMENT

-  MESSAGE FROM THE CEO
-  FUNDAMENTAL VALUES
-  NUCLEAR SAFETY CULTURE
-  CODE OF CONDUCT
-  APPLICATION OF
APPROPRIATE BUSINESS
PRACTICES AND COMPLIANCE
-  AVOIDING CONFLICTS OF
INTEREST
-  IMPLEMENTING THE
MEASURES OF THE NATIONAL
ANTI-CORRUPTION STRATEGY
-  INTERNATIONAL SANCTIONS
-  COMPLIANCE WITH THE
CONFIDENTIALITY OF
PERSONAL DATA
-  REPORTING IRREGULARITIES