Annex No. 1

Approved by order of Rosatom Central Europe Kft.

dated December 8, 2021 No. 338/HU-01.02/47

**Anti-bribery and Corruption Policy**

1. Designation and Intended Purpose
	1. This Anti-bribery and Corruption Policy in Rosatom Central Europe Kft. is an element of the overall anti-bribery system of Rosatom Central Europe Kft. (hereinafter RCE) in carrying out activities

1.2. The Policy is an integral part of RCE's organizational and administrative documents and is binding on all RCE's employees.

1.3. RCE shall take all necessary steps to familiarize its business partners and contractors with the Policy.

1.4. The Policy is an open, public document. RCE shall provide access to the Policy to all its employees and interested parties.

1.5. RCE's organizational and administrative documents shall not contradict to the provisions of the Policy and, if contradictions are identified, they shall be brought in line with the Policy, unless the Executive Director of RCE adopts a resolution to eliminate contradictions by amending the Policy.

1.6 RCE shall issue other documents on combating bribery and corruption that do not contradict this Policy, in accordance with the established procedure.

1. Abbreviations
	1. In this Policy, the following abbreviations and decryptions are used:

Rosatom Central Europe Kft. - RCE.

 3. Objectives and Principles of the Policy

3.1. This Policy is developed and implemented as one of the main elements of the Anti-bribery and Corruption System in carrying out activities in order to:

- determine the basic principles, terms and conditions for combating Bribery and Corruption in RCE, as well as within the Organization's business activities;

- form the System taking into account international and Hungarian experience;

- create an effective system for monitoring the compliance by all RCE's employees with the requirements of international law, Hungarian legislation, local RCE's regulations in the field of combating Bribery and Corruption;

- create conditions that prevent Bribery and Corruption;

- form an atmosphere of intolerance to Bribery and Corruption in RCE.

3.2. The fundamental principles of RCE are the principles specified in Sub-clauses 3.2.1 - 3.2.10 hereof.

3.2.1. Integrity - RCE has been and continues to be committed to maintaining high standards of business ethics, honesty and openness in all its business operations.

3.2.2. Legality - RCE undertakes to comply with the laws of all countries in which it operates, constantly adhering to high international ethical standards to ensure transparency of entrepreneurial activities, rejection of bribery and other acts of corruption on the part of its employees and managers. For these purposes, a System is established in RCE, which is binding on all RCE's employees.

3.2.3. Demonstration by all RCE's employees of an example of compliance with the rules and norms of ethical behavior, intolerance to bribery and corruption.

3.2.4. The assumption by employees of the obligation to contact an authorized employee in accordance herewith in any case when the signs of Corruption, Bribery or Facilitation Payment are detected (at the same time, for the purposes hereof, it does not matter whether any act of Bribery in the interests of RCE is carried out directly by RCE's employee or contractor or any other person by prior agreement with RCE's employee or contractor in the interests of RCE).

The subjects of Bribery are employees of RCE~~,~~ as well as business partners acting in the interests of RCE, such as agents or consultants.

The signs of Bribery shall include:

providing an Advantage for making a decision in favor of RCE by the Recipient;

making a Facilitation Payment;

violation of the provisions hereof when providing Business courtesies;

provision of RCE's objects or property for free use, provision of property-related services free of charge;

conclusion of an agreement with a company owned by a Public Officer or a person holding a senior position in RCE, RCE's counterparty, or members of their families;

3.2.5. RCE's employees shall be guided by the definition of "Bribery" given herein, common sense and assess any transaction for the presence of signs of Bribery and Corruption in accordance herewith. In case of any doubts about the correctness of their actions, RCE's employees shall apply to an authorized employee for clarification in a particular situation.

3.2.6. RCE's employees shall comply with RCE's local regulations, governing RCE's areas of activity, specified in Clause 5.3 hereof.

3.2.7. All RCE's employees shall act and use RCE's resources only in its interests, clearly differentiate between the interests of RCE and their personal interests and avoid a possible Conflict of Interest.

3.2.8. RCE's employees (personally or through intermediaries) shall not allow Bribery or Corruption or Mediation in bribery.

3.2.9. RCE's employees shall comply with the legislation of Hungary in the field of combating corruption, as well as the provisions hereof.

3.2.10. If RCE's employees detect signs of Bribery (on the part of RCE's employees or contractors), and/or Facilitation Payments and/or manifestations of Corruption (on the part of RTS employees), they shall report them to an authorized employee in accordance herewith.

4. Combating Bribery and Corruption in RCE

4.1. Combating Bribery and Corruption in RCE is one of the key components of its normal functioning, in this regard, RCE shall establish a total ban on Corruption, Bribery and Facilitation Payments.

4.2. The ban on Bribery and Facilitation Payments shall apply to all RCE's commercial activities in all countries of its operation, except for the cases provided for by Clause 5.2. hereof.

4.3. If actions containing signs of Bribery or Facilitation Payments are permitted under the applicable written law of the country in which it is planned to perform these actions, such actions may be carried out only by agreement with RCE's manager and authorized employee, otherwise such actions shall be prohibited.

4.4. RCE's areas of activity susceptible to the possibility of committing Bribery, Corruption, as well as Facilitation Payments:

contractual activities;

procurement activities;

interaction with public authorities;

charitable activities;

provision of Business Courtesies.

4.4.1. When dealing with RCE's contractors, carrying out contractual activities, RCE's employees shall act exclusively in the interests of RCE, prevent cases of Bribery or Corruption, be guided by and strictly comply with the provisions of RCE's local regulations governing business processes and contractual activities.

4.4.1.1. RCE's employees, in particular, when interacting with contractors shall:

familiarize a contractor with the Code of Corporate Ethics of RCE;

pay remuneration and reimburse the contractor for expenses under the agreement/contract (unless the agreement/contract with the contractor expressly provides otherwise);

document the relationship between the parties in the form of a written agreement.

4.4.1.2. Prevention of Bribery or Corruption in the course of contractual activities shall consist in identifying signs of Bribery on the part of RCE's contractors, as well as Corruption on the part of other RCE's employees involved in contractual activities.

4.4.2. When preparing procurement documentation and carrying out procurement activities, RCE's employees shall be guided by and comply with the UIPS requirements, the requirements of RCE's local regulations governing the procedure for approval of procurements from a single supplier (counterparty, contractor) when placing orders, as well as the procedure for preparing and conducting open competitive procurement procedures, refrain from actions based on Personal Interest, which can affect the efficiency of procurement activities and the proper performance of duties by RCE's employees.

4.4.2.1. RCE's employees who are members of the procurement commission shall be objective in making decisions, act exclusively in the interests of RCE, prevent cases of Corruption, and also comply with requirements of the Regulation on the activities of RCE's procurement commission.

4.4.3. When interacting with public authorities, RCE's employees shall refrain from committing Bribery, as well as making any Facilitation Payments.

4.4.4. RCE shall not provide financial or other assistance to political parties (RCE), nor participate in the financing of election campaigns of candidates for elective office, as such assistance can be considered as an attempt to obtain an undue commercial advantage for RCE.

4.4.4.1. RCE's employees can exercise their personal rights to participate in political movements in accordance with Hungarian law, including making donations to political parties at their own discretion. However, in this case, RCE's employees shall:

ensure that this is made using their own time and resources;

exclude any possibility of misinterpretation of their views and actions on the part of any persons as related to the official position of RCE, and not as their personal views and actions;

ensure that such actions do not conflict with their functional duties in RCE.

4.4.4.2. RCE's charitable activities shall be carried out exclusively on the basis of general industry limits for charitable activities approved by State Corporation Rosatom.

4.4.4.3. Any RCE's unscheduled activities of a charitable nature or charitable donations at the request of non-profit organizations shall be carried out only based on a resolution of RCE's governing body, determined in accordance with RCE's local regulations.

4.4.5. The provision of Business Courtesies that do not violate the provisions hereof may contribute to creating a positive business reputation and maintaining friendly working relations.

4.4.5.1. The provision of Business Courtesies shall not violate the ethical principles of RCE's activities established by the Code of Corporate Ethics of RCE.

4.4.5.2. The provision of Business Courtesies shall be performed in strict accordance with the limits established in RCE's budget for the relevant types of expenses and be subject to control in accordance with the budget control procedures established in RCE.

4.4.5.3. When providing Business Courtesies to RCE's employees, it shall be prohibited to:

give cash or its equivalent (gift certificates, loans, shares or share options, etc.) regardless of value;

hold a hospitality event without the accompaniment and/or participation of RCE's employees;

provide Business Courtesies to family members of an employee of a contractor, partner or other person, except for special events, business etiquette (custom) of which provides for the participation of spouses.

4.4.5.4. RCE's employees shall be prohibited from providing Business Courtesies to Public Officers, except for souvenirs.

4.4.5.5. RCE's employees shall be prohibited from providing Business Courtesies to third parties on behalf of actual or potential counterparties or other business partners of RCE.

4.4.5.6. The procedure for using, reporting on production costs using a corporate card, the rights and responsibilities of corporate card holders shall be determined in accordance with the rules of use of corporate cards in RCE.

4.4.5.7. If necessary, RCE may arrange for its business partners an entry visa, hotel reservations, transfers, purchase of air and railway tickets, medical insurance, etc. for on a reimbursable basis, with the subsequent full reimbursement by the relevant business partners for the costs incurred by the Organization.

The actions specified in the previous paragraph shall be carried out by the Organization only:

if there is a letter of guarantee from RCE's business partner with a positive resolution of the Director General of RCE;

in the absence of overdue debts of the business partner to the Organization.

Issuing entry visas, booking hotels, transfers, purchasing air and railway tickets, medical insurance, etc. for RCE's business partners free of charge (without subsequent full reimbursement of expenses incurred by the Organization from relevant business partners) shall be prohibited.

4.4.5.8. Accounting for souvenirs and printed products provided by the Organization, as well as hospitality expenses shall be carried out in accordance with RCE's local regulations.

5. Functions of officials and structural units of Organizations in the field of combating Bribery and Corruption

5.1. RCE's Managing Director shall:

5.1.1. Make final decisions on all issues related to the functioning of the System. Exercise control over the organization and implementation of the System as a whole.

5.1.2. Demonstrate to RCE's employees by personal example compliance with the rules and norms of ethical business conduct, rejection of Bribery and Corruption.

5.1.3. Supervise the development and implementation of measures in the field of combating Bribery and Corruption in RCE and participate in the investigation of the reasons for non-compliance with the requirements of RCE's local regulations in the field of combating Bribery and Corruption within their competence.

6. Sending information on suspicion of committing Bribery,

Corruption or other violations hereof

6.1. Sending information on signs of Bribery, Corruption or other violations hereof shall be carried out by an RCE's employee or any interested person in the form of provision of an authorized employee with information related to the alleged violation or illegal actions of both RCE's employees and counterparties, partners, consultants of other persons.

6.2. Reporting suspected Bribery, Corruption, or other violations hereof may include the information regarding:

non-compliance by RCE's employees with local regulations of State Corporation Rosatom and RCE governing the areas of activity of RCE, specified in Clause 4.4 hereof;

actual Conflicts of Interest or signs of their occurrence;

improper actions of business partners and counterparties of RCE;

violations of ethical conduct of business, violations of the Code of Corporate Ethics of RCE;

acts and omissions of RCE's employees, which can damage the business reputation of RCE;

intentional errors, misstatements or material omissions of information for the purposes of accounting and tax accounting and reporting, internal control and audit, submission of information to public authorities or document falsifications;

intentional (deliberate) concealment of information about the commission of unlawful actions by an employee of RCE.

6.3. If RCE's employees detect signs of illegal activity on the part of other RCE's employees or reveals an already accomplished fact of illegal activity, they shall report such circumstances to an authorized employee.

6.4. An employee of the Company shall immediately inform an authorized employee of the Company about cases that cause suspicion of Bribery, Corruption or other violations hereof.

6.5. Reports of suspected Bribery, Corruption, or other violations hereof shall be true, free from false motivation, malicious intent or personal advantage.

6.6. Upon receipt of information on suspicion of Bribery, Corruption or other violations hereof, an authorized employee shall take all necessary measures to ensure confidentiality in relation to the employee of RCE who reported suspicions.

6.7. In order to conduct a comprehensive investigation, clarify all the circumstances that have caused suspicions of Bribery, Corruption or other violations hereof, anonymous reports shall not be allowed.

6.8. Upon receipt of information about suspicion of Bribery, Corruption or other violations hereof, an authorized employee shall conduct an official investigation of such information in accordance with the procedure established by the local regulation of RCE, governing the procedure for conducting an internal investigation in RCE.

6.9. If it is established that an employee of RCE has sent deliberately false information about suspicion of Bribery, Corruption or other violations hereof, such employee shall be subject to disciplinary measures.

7. References to the legislation of Hungarian Act CLXIII of 2009 "On Combating Corruption"*.*

* 1. Act C/2012 on the Hungarian Criminal Code, Article XXVII "On Corruption"
	2. Order of State Corporation Rosatom No. 1/24-П dated January 20, 2015 "On ensuring anti-corruption work in RCE's companies engaged in foreign economic activity".
1. Liability of RCE's employees

8.1. Each employee of RCE shall be personally liable for compliance with this Policy.

8.2. Employees who have violated the requirements hereof may be subject to disciplinary measures up to dismissal in accordance with the labor legislation of Hungary, and may also be subject to administrative or criminal liability under the law of Hungary.