



ROSATOM

CODE

**of Ethics and Professional Conduct
of the Employees of ROSATOM**





Dear colleagues and counterparts!

The most important in Rosatom are our people. The activities of our employees determine success and achievements of the State Corporation.

Thus, our success is closely linked to our culture; our objective is to support this culture at the highest level: act honestly, fairly, responsibly and respectfully.

The rules and principles described in the Code promote enhancement of efficiency of each employee, assist to build up relationships with external and internal partners, provide target points for settlement of complex situations associated with culture of business behavior, labor ethics, communication and legal risks.

The culture adopted in Rosatom significantly influences all types of relationships inside the State Corporation and beyond it; this culture governs how our partners and clients assess the results of our works and our achievements.

I am quite positive all employees of Rosatom independently on their professions and ranking of job positions share the provisions stipulated in the Code of Ethics and Professional Conduct.

Sincerely yours,
Director General of
State Corporation Rosatom

S.V. Kirienko

A handwritten signature in dark blue ink, consisting of several overlapping loops and strokes, positioned below the printed name.

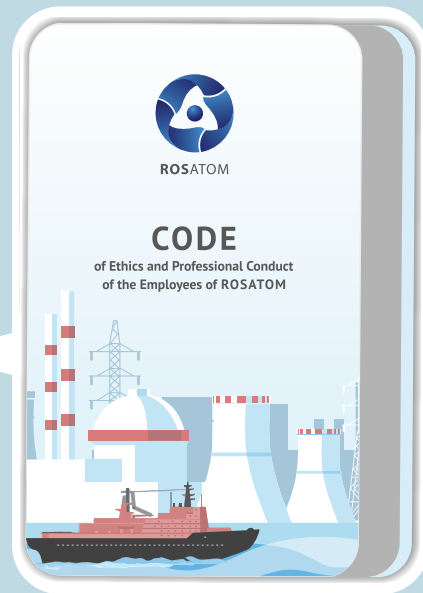
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1.

Introduction

1.1. The Code of Ethics and Professional Conduct of the Employees of ROSATOM is the document that translates values of the Corporation, identifies ethical principles and rules of conduct based thereof, including standards established in the applicable local regulatory acts of the Corporation. The Code is not an exhaustive body of rules.



1.2. The Code is called to facilitate:

- prevention of risks of breaches of the law and ethical principles of conduct adopted in the Corporation;
- strengthening of the business reputation of the Corporation;
- introduction of the Corporation's values in the sector.

1.3. The Code is based on provisions of the following documents:

- Federal Law No. 317-FZ of 01.12.2007 "On the State Atomic Energy Corporation 'Rosatom'",
- Federal Law No. 273-FZ of 25.12.2008 "On Countering Corruption",
- General Principles of Professional Conduct of Civil Servants, as approved by Decree of the President of Russian Federation No. 885 of 12.08.2002,
- Methodological Recommendations for Development and Adoption of Corruption Prevention and Countering Measures (Ministry of Labor of Russia, 08.11.2013),
- IAEA Recommendations "Handbooks of Nuclear Law", 2006, 2010, IAEA Safety Guide No. GS-G-3.5, 2014;
- The Kyoto Protocol to the United Nations Framework Convention on Climate Change, Kyoto, 1992;
- Unified Sectoral Anti-Corruption Policy of the State Atomic Energy Corporation "Rosatom" and its Organizations, as approved by ROSATOM's order No. 1/364-P of 14.04.2015.

2.

Values of the Corporation

The following values are adopted in the Corporation:

One Team

We all are ROSATOM. We have common goals. Working in a team of like-minded fellows allows for unique results. Together we are stronger and can achieve most ambitious goals. The successes of our employees are the successes of the team.

Respect

We always treat our customers, partners and suppliers with respect. We always attentively listen to and hear each other, regardless of positions and places of work. We respect the history and traditions of the nuclear industry. The achievements of the past inspire us for new victories.

Responsibility for the Result

Each of us bears personal responsibility for his/her work result to the State, Sector, colleagues and customers. In our work, we set for ourselves the most stringent requirements. It is not the spent effort that is evaluated, but the achieved results. The successful results are the basis for our new achievements.



Efficiency

We always find the best solutions to problems. We are efficient in all we do; when achieving the set targets, we make efficient use of the company's resources and are continuously improving our working processes. There are no obstacles that can hinder our finding out the most efficient solutions.

One step ahead

We strive to be the leader in the global market. We are always one step ahead in technology, knowledge and the professional strength of our employees. We foresee what will be tomorrow and are ready to be it today. We continuously advance and learn. Every day we try to work better than yesterday.

Safety

Safety is the highest priority. In our work, we ensure absolute safety of people and the environment first. There are no minutiae in safety; we know safety rules and follow them, while putting a stop to violations.

Provided unavailability of the corresponding norms set by local corporate acts of the Corporation the decisions are to be made on the basis of the values of the Corporation.

3.

Ethical Principles of Conduct of the Corporation' Employees

3.1

Common Ethical Principles of Conduct of the Corporation' Employees:

- compliance with the law of the Russian Federation and other countries where the Corporation operate;

- intolerance to violations of labor protection and safety requirements in the use of atomic energy;

- inadmissibility of any forms of coercion and harassment;



- zero tolerance to corruption;
- inadmissibility of favoritism and discrimination associated with race, skin color, nationality, ethnic affiliation, gender, age, confession and religion conviction, property, social, official, marital status, political convictions, adherence to non-governmental associations, human physical capacities, and other similar characteristics;
- inadmissibility of humiliation of honor and dignity of other people;
- inadmissibility of circulation of knowingly false information, which tarnish the honor and dignity of employees and partners, and undermine their reputation.

3.2.

Relations with the State

The employees of the Corporation:

- are aware of their special responsibility arising from the participation of the Russian Federation in management of the Corporation and strive to be a pattern to follow in execution of their powers serving the interests of the State;
- in his/her activities are guided by generally recognized principles and norm of the international law and legislation of the Russian Federation;
- build up sustainable and constructive relationships with the State powers and local authorities being guided by the principles of responsibility, good faith and independence;

- do not use their official and occupational status to impact activities of the State bodies, organizations, officials, civil servants and citizens in settling personal matters;
- demonstrate civility and solicitude in treating citizens and officials;
- refrain from public utterance, judgments and assessments on behalf of the Corporation as regards activities of the State body or local authority, its head, if it is beyond job duties of the employees.

3.3.

Relations with Organizations' Founders (Partners) and Investors

The Corporation takes care of enhancement of investment attractiveness and strengthening business reputation in the eyes of investors. Transparency and openness are the foundation for trust in the Corporation.

The Corporation respects rights of all organizations' founders (partners) and investors and guarantee them that their rights, as established by the law of the Russian Federation and local regulatory acts of the Corporation, will be observed.



Employees of the Corporation:

- timely and in full, provide the parties concerned with the material information about the Corporation' activities through public disclosure in accordance with the established procedure, except for the restricted access information and data, which constitute the State secret.



3.4.

Relations with Employees

Professionalism and involvement of the personnel are a valuable resource of the Corporation. The Corporation facilitate enhancement of prestige of work in the nuclear sector and ensure that the employees have safe labor conditions. Leaders of the Corporation strive to create an atmosphere, which facilitate unveiling the employees' potential, in the team.

The Corporation recognize labor rights an integral part of human rights, observe the principles of social partnership, terms and conditions of the existing Industrial Agreements on Atomic Energy, Industry and Science, Collective Employment Agreement, and support nuclear industry veterans as per the provision of social policy of the Corporation.



To develop the career, the Corporation' employees have to:

- follow the corporate values;
- fulfill individual KPI 100% and higher;
- be ready to rotation both inside the Corporation or between its organizations, to additional load and work in conditions of changes;
- be ready to move to other regions.

3.5.

Relations with Society and Non-governmental Organizations

The Corporation' activities affect residents of their host regions. The Corporation are guided by the principle of social responsibility in making decisions dealing with interests of the local population.

For the Corporation, the environment is the prime resource that needs security and protection.



Employees of the Corporation:

- show tolerance and respect for traditions of the peoples in host regions of the Corporation, take account of cultural and other features of different ethnic, social groups and confessions, facilitate inter-national and inter-confessional consent;

- observe neutrality that excludes a possibility of influence of political parties and other non-governmental associations' decisions on their official activities;

- exclude any actions capable to raise doubts in objective performance by the Corporation employees of the job duties and do not allow conflict situations that might damage their reputation or reputation of the Corporation;

- do not favor any professional and social groups and organizations, retain independence from influence of individuals, professional or social groups and organizations;

- contribute to development of regions through participation in solving current objectives and implementation of development projects of the host regions of the Corporation;

3.6.

Relations with Contractors and Business Partners

The Corporation build up interaction with contractors and business partners on an open and mutually beneficial basis while fulfilling undertaken commitments in the full scope. At the same time, the Corporation set forth strict requirements to quality of provided goods and services, to reliability of contractors and business partners, to observance by them of the business community rules, including anti-corruption rules.



Employees of the Corporation:

- take account of contractor and business partner attitudes to ethical principles of conduct of the Corporation' employees;
- thoroughly consider and timely respond to claims, applications and proposals incoming the Corporation regarding the issues of relationships with counteragents and business partners.

3.7.

Relations with Mass Media

The Corporation continuously interact with mass media and build it up on the principles of openness and transparency. The Corporation and its organization carry out relations with mass media through structural divisions and (or) employees having the corresponding authorities. Only authorized officials of the Corporation can appear before mass media as well as at events with mass media participation.



Employees of the Corporation observe the following rules in relations with mass media:

- avoid any statements and utterance uncoordinated with the authorized structural division of the Corporation or an organization of the Corporation, which may be perceived as an official position of the Corporation and (or) its organizations;
- refrain from passing to mass media information and documents about the Corporation's activities, which has not been agreed upon with the authorized structural division of the Corporation or an organization of the Corporation;
- in the event of speaking as a Corporation or its organizations' employee at a public assembly with participation of the federal and regional mass media, get this speech agreed with the authorized structural division of the Corporation or an organization of the Corporation authorized to interact with mass media;
- without comments and distortions send appeals (information) from mass media representatives to structural divisions and (or) employees of the Corporation or its organizations having authorities to interact with mass media;
- in preparing public presentations aimed at the outside audience, use local regulatory acts of the Corporation on creation and drawing of presentations.

4.

Rules of Conduct of Employees of the Corporation

4.1

Corruption Control

Corruption control in the Corporation is carried out in accordance with the Anti-corruption Policy.

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The leaders of the Corporation are the guarantors that the anti-corruption rules and procedures are fulfilled; they demonstrate the personal example of observance of the anti-corruption rules of conduct and bear personal responsibility for non-observance of principles of the Anti-corruption Policy in the Corporation.

Employees of the Corporation:

- refrain from corruption and other breaches of law in the interests or on behalf of the Corporation;
- strive to avoid the conduct, which may be interpreted by others as readiness to commit or participate in commitment of a corruption-related crime in the interest or on behalf of the Corporation.



4.2.

Security of Recourses and Property

Delicate handling of property, its use only for the intended purpose, and economical spending of resources are an important condition of efficiency and stability of the Corporation of its organizations' activities and care of future generations.

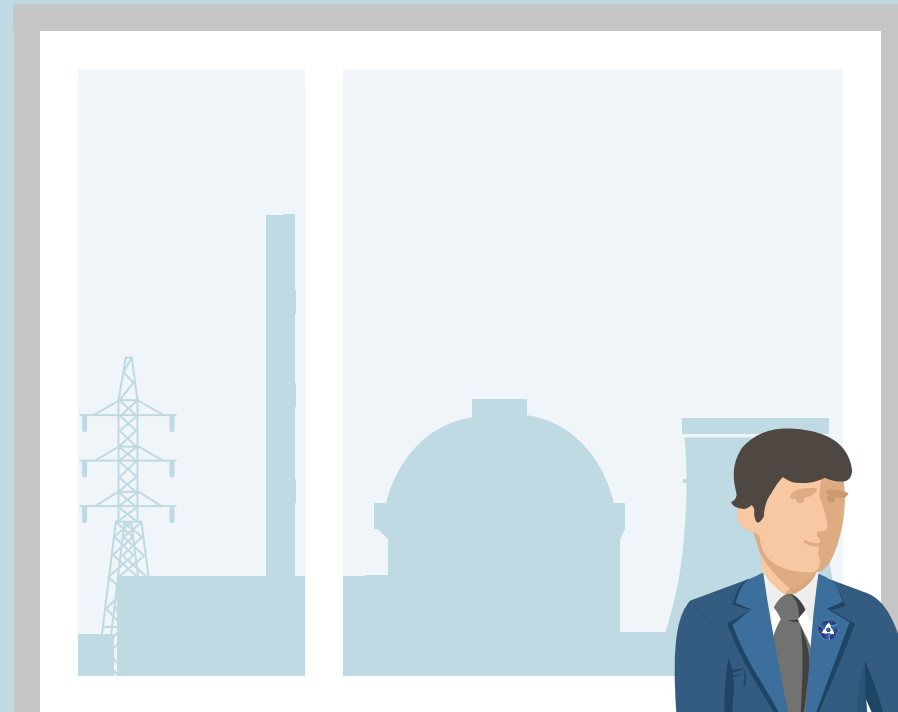
Employees of the Corporation:

- in planning and use of resources, choose the option, where it is possible to minimize expenses if this does not affect safety, quality and terms;
- use resources and property of the Corporation (including tools and equipment, vehicles and different means of communication) for execution of their employment duties only.

4.3.

Information Security

A breach of confidentiality of information or a procedure of handling the documents, which contain such information, can impair the Corporation. The Corporation introduce constraints on handling confidential information as per the law. These constraints help maintain a reasonable balance between openness and observance of the business and economic interests of the Corporation.



Employees of the Corporation:

- observe provisions of the documents, which regulate the handling procedure of confidential information and personal data of employees;
- hand over confidential information to third persons in accordance with the law and local regulatory acts of the Corporation publishes in furtherance of the law.

4.4.

Conflict of Interests

Employees of the Corporation:

- avoid situations, which lead to conflicts of interests or have signs thereof;
- take statutory required measures to prevent a conflict of interest and to settle arising conflicts of interests.



4.5.

Receiving and Giving Gifts, Exercise of Hospitality

Receiving and giving gifts, exercise of hospitality are the sign of politeness and respect, they facilitate building up business relations provided they are of symbolic nature, not called to influence decision-making, and do not give rise to tracing such influence.

Employees of the Corporation:

- are guided by special requirements for receipt of, giving gift and showing hospitality in accordance with the law and local regulatory acts of the Corporation published in its furtherance.



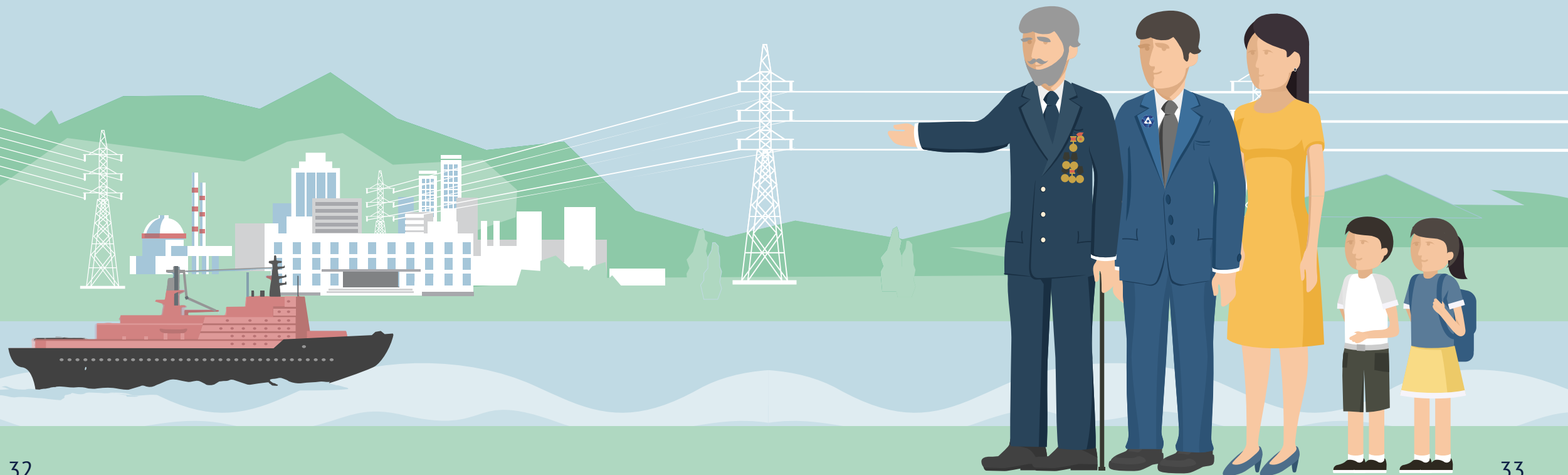
4.6.

Employment of Employees' Relatives of the Corporation

The Corporation welcome the wish of relatives of an employee of the Corporation to work in the Sector. With this, all candidates participate in competitions for filling vacant positions on the same basis as everyone else and do not have an advantage or special rights upon entry into employment.

Employees of the Corporation:

- do not affect decisions on promotion of their relatives who work in the Corporation;
- do not use their links to relatives to influence decision-making in fulfilling their official duties.



4.7.

Labor Protection, Environmental Protection, Nuclear, Radiation and Industrial Safety

Protection and safety of environment are the priority environmental objectives of the Corporation.

The Corporation performs reliable environmental policy, which is based on the principles of reasonable nature exploration, preservation of the environment in the regions of industrial activities, enhancement of the radiation monitoring systems;

As a major electricity producer in the Russian Federation the Corporation provides the consumers with environmentally clean energy such making a significant contribution to performance of national commitments by Kyoto protocol (agreement on measure to prevent emissions of greenhouse gases) and other international treaties;

The corporation ensures safe labor conditions for its employees. All injuries, incidents and events without any exception as well as its precursors are the subject for investigations. The investigations shall result in making decisions excluding a repetition of such events.

Violation of requirements of labor protection, environmental protection, nuclear, radiation and industrial safety entails applying to employees the penalties as per norms of the law of the Russian Federation, host countries of the Corporation.

Employees of the Corporation:

- given the responsibility towards future generations, find the balance between economic initiatives and essential environmental issues;
- in addition to the mandatory preventive actions excluding the risks for the general public and environment work on minimization of negative influence caused to the environment by application of their own engineering achievements and world best practices in this area;
- are aware and observe requirements of the law of the Russian Federation, local regulatory acts of the Corporation in the field of labor protection, environmental protection, nuclear, radiation and industrial safety;



4.7.

Labor Protection, Environmental Protection, Nuclear, Radiation and Industrial Safety

- immediately stop any work if it can lead dangerous consequences for their own lives or safety of others;
- start (allow other employees) working only if there are qualifications corresponding to this work, appropriate training and absence of medical contra-indications;
- use personal protection equipment when such equipment is necessary for fulfillment of production objectives;
- provide information, render other assistance in investigation into occupational injuries and prerequisites thereof;
- refrain from being at the working place under the influence of alcohol, drugs or other matter, bringing, storage or distribution of drugs and other substances, which circulation is prohibited by law, in any rooms of the Corporation;

- refrain from smoking on the premises or in facilities of the Corporation, except for specially designated places;
- immediately inform the authorized structural division or official of the Corporation on potential and occurring violations of labor protection, environmental protection, nuclear, radiation and industrial safety;
- have the right of protection of confidentiality of information about the fact and content of such appeals;
- involve non-governmental environmental organizations to participation in discussions of the planned activities in the area of use of atomic energy with respect to the issues of environment protection and ensuring environmental safety;
- promote development of environmental culture, environmental education, training and bring-up of the Corporation employees and general public in the regions hosting nuclear facilities.



Conflicts in the Corporation

The Corporation carries out necessary actions to reduce risks of conflicts and disputes between employees of the Corporation.

The Corporation recognizes the importance of pre-trial settlement of internal conflicts and strives to settle all disputes through negotiations with employees.

Employees of the Corporation:

- when prerequisites of a conflict arise or appear, in the framework of the Corporation, turn to an immediate supervisor or to structural divisions of the Corporation responsible for human resource management.



Corporate Identity

Each employee shall facilitate building up the corporate identity of the Corporation. An appearance and conduct of an employee influence on how external audience perceive nuclear sector.

Employees of the Corporation:

- when interacting with representatives of stakeholders, observe generally accepted rules of politeness and business communication;
- when representing interests of the Corporation, avoid conduct and utterance damaging identity of the Corporation;
- selecting clothes for work, are guided by generally accepted dress code rules based on the principles of modesty, accuracy and cleanness.



5.

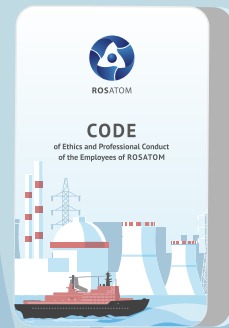
Application of the Code

This Code covers all spheres of activity of the Corporation. All internal regulatory documents are produced taking into account the Code provisions.



Observance of the Code's provisions does not replace the necessity of observing requirements of law of the Russian Federation and other countries where the Corporation operate. Should any contradictions arise between the provisions of the Code and requirements of the law, it is necessary to be guided by requirements of the law.

The responsible person for updating of this Code of ethics and surveillance over compliance with its provisions is the director for personnel management of State Corporation Rosatom. All amendments are to be introduced in accordance with the procedure established in the Corporation.



Most important tool of enforcement of observance of the Code provisions is the employee's inherent self-assessment and his/her moral appraisal by superiors and colleagues.

5.

Application of the Code

When formulating appeals regarding violations of the Code provisions, the employees should follow the following procedure:

1 to indicate the violator that it is impermissible to violate the Code procedures and to require stop these actions;



2 in case there is no a positive result, to notify the immediate superior on the violation;

3 if the immediate superior is involved in the violation or does not take measures to stop the violation, to notify Council of ethics.



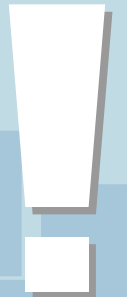
4 The Council activities are governed by the Provisions approved by the order of the Director General of the Corporation.



5 In the Corporation, pursuit or punishment of employees for appeals related to potential and occurring violations of this Code by other employees is prohibited.



6 Incompliance with the provisions of this Code for the Corporation employees might lead to disciplinary and other types of disciplinary liability in the cases of violations of the corporate acts adopted in pursuit of this Code.



7 An employee might address any issues associated with application of this Code to the Directorate for personnel management of the Corporation.

6.

Basic Terms and Abbreviations

For the purposes of this Code the following terms and abbreviations are used:

Anti-corruption Policy is a local regulatory document of the Corporation or an organization of the Corporation, which main purpose is to define principles of combating corruption.

Confidentiality of information is the requirement for a person received specific information not to transmit such information to third persons without consent of its holder.

Conflict of interests is the situation where vested interest (direct or indirect) of the Corporation employee, who holds the position, which assumes the responsibility of taking measures to prevent or settle the conflict of interests, affects or can affect the proper, objective and impartial execution by him/her the duty of office (exercise of powers).

Corporation is the State Atomic Energy Corporation “Rosatom”.

KPI is the key performance indicator.

Vested interest, in the context of the term “vested interest”, is understood as a possibility of receiving incomes as money, other property, including property rights, monetized services, results of executed works or any other benefits (advantages) by an employee of the Corporation or its organizations, who holds the position, which assumes the responsibility of taking measures to prevent or settle the conflict of interests, and (or) persons being his/her close relatives or connections by marriage (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and children’s spouses), citizens or organizations, with which the said employee, and (or) persons being his/her close relatives or connections by marriage, is bound by property, corporate or other close relations.

6.

Basic Terms and Abbreviations

Organizations of the Corporation are the federal state unitary enterprises, with respect to which the Corporation executes powers of the property owner on behalf of the Russian Federation, joint stock companies, which shares are owned by the Russian Federation and with respect to which the Corporation executes powers of the shareholders, their affiliated companies and business companies, which shares (interests) are owned by the Corporation and above said organizations.

Rotation is constant or temporal change of the employee's labor function upon continuation of employment with the same employer as well as transient of the employer for employment with a different employer. Performed as temporal transition in the form of assignment.

Mass media are the mass media agencies and corporations.

Council on ethics is the continuously acting structure of the Corporation, which main purpose of activities is the assessment of the actions of the Corporation's employees for compliance with the provisions of this Code of ethics.

Ethics is the system of moral principles, norms and values that determine the behavior of a human being and allow giving positive or negative assessment of his/her actions, ideas and attitudes.

Ethical assessment is the interpretation of actions/withstanding from actions of the Corporation employees from the point of view of compliance of their behavior to the norms and rules stipulated by this Code of ethics.

Ethical principles are the principles and norms of business ethics and rules of business attitude and behavior stipulated by this Code of ethics.

