

Appendix 1 to
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UNIFORM INDUSTRY ANTI-CORRUPTION POLICY
adopted by ROSATOM State Atomic Energy Corporation and its organizations

Table of contents

1. Purpose and scope	3
2. Terms and abbreviations	3
3. Basic principles of anti-corruption activities, approaches to implement actions, and tools used	5
4. Normative references	8

1. Purpose and scope

1.1. The Uniform Industry Anti-corruption Policy of ROSATOM State Atomic Energy Corporation and its organizations (hereinafter referred to as the Anti-Corruption Policy) is developed to establish common principles, methodological approaches, tools to counter corruption and ensure the following:

1) formation of the regulatory, methodological and organizational framework for combating corruption in ROSATOM State Corporation (hereinafter referred to as the State Corporation) and its organizations in accordance with the legislative acts and management's decisions in the field of combating corruption;

2) informing the organizations of the nuclear industry about the legal support in anti-corruption work and responsibility for committing corruption offenses;

3) compliance by employees of the State Corporation and its organizations with anti-corruption standards, standards in the reduction of corruption which are provided for by the legislation of the Russian Federation.

1.2. The Anti-corruption Policy was issued pursuant to Federal Law No. 273-FZ of December 25, 2008 "On Combating Corruption" (hereinafter - Federal Law No. 273-FZ), other normative legal acts on anti-corruption practices [4] and lay the foundation in the development of regulatory documents of any groups of processes specifically pertaining to ensuring the anti-corruption thrust of these documents.

1.3. Compliance with the Anti-Corruption Policy is mandatory for all the employees of the State Corporation and its organizations during all operational business processes containing risks of corruption or other offenses, regardless of the position held and functions performed.

1.4. The Director of Asset Protection Department is responsible for updating the Anti-Corruption Policy and monitoring its implementation in accordance with the ROSATOM's Regulations on the Regulatory Documentation System.

2. Terms and abbreviations

2.1. The Anti-corruption Policy does not introduce any new terms.

2.2. The following abbreviations are used in the Anti-Corruption Policy:

Abbreviation	Definition
Assets	Resources ¹ of the State Corporation and its organizations, including objects of the civil law rights ²
Anti-corruption standards	Restrictions, bans, and obligations imposed by regulatory legal acts as well as internal policies and procedures of the State Corporation and its organizations, on certain categories of their employees in order to counter corruption
Safety	The absence of unacceptable (significant) risk associated with possible damage being the optimal balance of many

¹ Resources - the used and potential sources of meeting the public demands (GOST R 56828.15-2016. National Standard of the Russian Federation. Best Available Technology. Terms and definitions (approved and made effective by Order of Rosstandart on October 26, 2016 No. 1519-st).

² Objects of the civil law rights - property items including cash and security certificates, other property including non-cash money, book-entry securities, property rights; deliverables of work and services; protected intellectual property and related visual identities (intellectual property); intangible benefits.

Abbreviation	Definition
	factors (including human behavior), which reduces the modifiable risk associated with possible damage to public health and safekeeping and integrity of property to an acceptable (insignificant) level
Corporate officials	Persons who perform organizational, managerial, business, and administrative functions in the State Corporation and its organizations permanently, temporarily, or by special authority
Asset protection	Activities aimed at combating corruption and other legal offenses
Other legal offenses	Actions (inaction) and decisions of individuals (including corporate officials) and/or legal entities that impede and/or threaten to exercise the rights and legitimate interests of the State Corporation and/or its organizations in the field of ensuring safety and quality of products, nuclear, radiation, industrial, fire, environmental safety, as well as safety of hydraulic structures and labor protection, compliance with the consolidated legislation and other areas of activities aimed at achieving the statutory goals of ROSATOM State Corporation
Corruption	Official misconduct, bribery, abuse of authority, influence peddling practices or other illegal use by an individual of his official position, contrary to the legitimate public or state interests and in order to obtain benefits in the form of money, valuables, other property or monetized services, other property rights for themselves or third parties, or illegal transfer of such benefits to the specified person by other individuals. Corruption is also the commission of the listed acts on behalf or in the interests of a legal entity (clause 1 of Article 1 of Federal Law No. 273-FZ)
Asset Protection Units	Asset protection units of the managing companies of the divisions/ incubated businesses/ complexes, organizations that are within the State Corporation's control circuit, as well as asset protection units of the organizations in the control circuit of the managing companies of the divisions/ incubated businesses/ complexes
Corruption prevention	Activities aimed at introducing items of the corporate culture, organizational structure, rules and procedures which are regulated by the internal regulations, preventing corruptive legal offenses in the State Corporation and its organizations
Anti-corruption	Activities of federal government bodies, government bodies of the constituent entities of the Russian Federation,

Abbreviation	Definition
	local government authorities, civic institutions, legal entities, and individuals within their powers (clause 2 of Article 1 of Federal Law No. 273-FZ): a) concerning prevention of corruption including the identification and subsequent elimination of the causes of corruption (prevention of corruption); b) activities to identify, prevent, combat, disclose and investigate corruptive legal offenses (fight against corruption); c) activities to minimize and/or eliminate the consequences of corruptive legal offenses

3. Basic principles of anti-corruption activities, the approaches to implement and the tools used

3.1. Anti-corruption within the State Corporation and its organizations is based on the following principles stipulated by Federal Law No. 273-FZ:

1) promoting human and civil rights and freedoms (clause 1 of Article 3 of Federal Law No. 273-FZ) - any operational business process including combatting corruption are regulated and carried out in the State Corporation and/or its organizations with respect for the rights of its participants;

2) commitment to law (clause 2 of Article 3 of Federal Law No. 273-FZ) - constant and precise compliance with the requirements of the legislation, as well as those issued on the basis of and in pursuance of the relevant provisions of the law of the internal normative acts;

3) public exposure and transparency of the activities performed by the State Corporation and its organizations - the availability to citizens, organizations, the media, civic institutions of information about the activities performed by the State Corporation and its organizations, as well as their management in the sectors within their competence, not related to compliance with restrictions imposed by the legislation regarding the protection of the state and/or commercial secrets, other legally protected information;

4) inevitable liability for committing corruptive legal offenses (clause 4 of Article 3 of Federal Law No. 273-FZ) - in event of any corruptive violation (subject to proven guilt as prescribed by law), adequate punishment should be imposed and measures taken to compensate for the losses;

5) integrated implementation of organizational, information and promotional, socio-economic, legal, and other measures to combat corruption (clause 5 of Article 3 of Federal Law No. 273-FZ) - consistent, coordinated, and systematic implementation of the interrelated anti-corruption measures during all ongoing business processes;

6) priority application of preventive measures
 corruption (clause 6 of Article 3 of Federal Law No. 273-FZ) - the implementation of any operational business process is unacceptable, in the course of its

regulatory activity, without an assessment of corruption risks³, ensuring anti-corruption training to the participants, as well as taking other measures to identify and subsequently eliminate the causes of corruption and prevent corruptive legal offenses;

7) cooperation of the State Corporation and its organizations with civic institutions, international organizations, and individuals in the field of combating corruption - attracting, on mutually acceptable terms, representatives of civic institutions, international organizations, and individuals to participate in anti-corruption work in the forms that do not interfere with the achievement of the goals of the State Corporation and/or its organizations stipulated by the legislation of the Russian Federation, as well as providing feedback (communications, review of appeals, participation in surveys, etc.) on the effectiveness of anti-corruption measures applied.

3.2. When carrying out the anti-corruption activities in the State Corporation and its organizations, the following methodological approaches shall be applied:

1) the contingency/situational approach - anti-corruption is ensured in the course of all types of financial and economic activities with the participation, in the prescribed manner, of the structural units and/or employees whose powers refer to combatting corruption and other legal offenses;

2) the role-based approach - each participant, each event, an object of managerial, financial, economic and other activities carried out in the State Corporation, as well as its counterparties are in an equal manner considered a subject and object of security, a source and an object of the threat of corruptive and other legal offenses;

3) the risk-oriented approach - planning and implementation of the activities of the structural units and/or employees whose powers refer to combatting corruption and other legal offenses based on the analysis and assessment of the identified risks inherent in the operational business processes implemented in the State Corporation, as well as the concentration of anti-corruption efforts at the facilities previously exposed to corruption;

3.3. The State Corporation and its organizations use the following standard tools to combat corruption:

1) simulating threats, their development scenarios, vulnerabilities used by the sources of threats, possible losses, and the scale of potential damage;

2) automation of anti-corruption management processes;

3) controlling (planning, accounting, analysis of the state and/or vulnerability) of the assets of the State Corporation and/or its organization, as well as the exposure of employees to corruption-related factors (impacts), continuous assessment of the acceptability of the identified risks, the likelihood, directions and scale of risk occurrence based on the collected, analyzed and summarized relevant information;

4) informing in the form of the developed proposals and drafted decisions based on the results of the controlling, regarding application of the controlling and/or corrective actions;

³ An assessment of corruption risks in business processes is carried out in accordance with the Uniform Industry Methodological Guidelines for the Assessment of Corruption Risks in ROSATOM State Atomic Energy Corporation and its organizations as per Appendix 2 to the Order of ROSATOM State Corporation regarding the Approval of the Anti-Corruption Policy.

5) methodology as the organizational, advisory, and methodological support on the following issues (including but not limited to):

observance by the employees of the State Corporation and its organizations of restrictions and bans, requirements for the prevention or settlement of conflicts of interest, the performance of other duties established by the legislation of the Russian Federation (hereinafter referred to as the business conduct requirements);

advisory assistance regarding the practical application of the business conduct requirements;

legal education of employees;

performance of internal checks;

verification of the reliability and completeness of the information on income, expenses, property and property-related obligations submitted by the employees and citizens applying for positions in the State Corporation in accordance with the regulatory legal acts of the Russian Federation;

preparation, including anti-corruption expertise, of draft local regulations and legal acts including those on anti-corruption;

communications with law enforcement in the related field of activity;

6) monitoring of the anti-corruption work - observation carried out in the State Corporation and its organizations (collecting, claiming, analyzing and summarizing information) over the compliance with the anti-corruption legislation requirements of the anti-corruption local regulations of the State Corporation's organizations and their application in order to assess the status and improve the management of anti-corruption work;

7) hotline - a communication channel specially equipped to provide confidential information to the State Corporation and its organizations about legal offenses and to protect personal data of applicants.

3.4. The powers to ensure adherence to the principles, application of approaches and tools of the Anti-Corruption Policy in the State Corporation and its organizations are distributed between divisions and/or officials involved in asset protection, work with personnel, legal work coordinated by structural divisions and/or officials responsible for asset protection.

3.5. The senior management of the State Corporation and its organizations are responsible for compliance by subordinate employees with the requirements of anti-corruption norms of international treaties of the Russian Federation, the legislation of the Russian Federation and anti-corruption standards including for the timely adoption of effective measures aimed at preventing and settling conflicts of interest.

4. Normative references

4.1. Constitution of the Russian Federation.

4.2. Civil Code of the Russian Federation.

4.3. Labor Code of the Russian Federation.

4.4. Federal Law No. 230-FZ dated December 25, 2008 "On Monitoring the Conformity of Expenses of Persons Holding Public Office and Other Persons with their Income".

4.5. Federal Law dated December 25, 2008 No. 273-FZ "On Combating Corruption".

4.6. Federal Law dated July 17, 2009 No. 172-FZ "On Anti-corruption Expertise of the Regulatory Legal Acts and Drafts of the Regulatory Legal Acts".

4.7. Decree of the President of the Russian Federation dated April 02, 2013 No. 309 "On Measures to Implement Certain Provisions of the Federal Law "On Combating Corruption".

4.8. Decree of the President of the Russian Federation dated April 02, 2013 No. 310 "On Measures to Implement Certain Provisions of the Federal Law "On Control Over the Compliance of Expenses of Persons Holding Public Office and Other Persons with their Income".

4.9. Decree of the President of the Russian Federation dated July 08, 2013 No. 613 "Anti-corruption Issues".

4.10. Decree of the President of the Russian Federation of June 29, 2018 No. 378 "On the National Anti-Corruption Plan for 2018/2020".

4.11. Decree of the Government of the Russian Federation dated February 26, 2010 No. 96 "On Anti-corruption Expertise of Regulatory Legal Acts and Draft Regulatory Legal Acts."

4.12. Decree of the Government of the Russian Federation dated August 21, 2012, No. 841 "On Compliance by Employees of the State Corporations and State-owned Companies with the Provisions of Article 349¹ of the Labor Code of the Russian Federation."

4.13. Decree of the Government of the Russian Federation dated July 22, 2013, No. 613 "On the Submission by Citizens Applying for Positions in Organizations Created to Fulfill the Tasks Assigned to the Government of the Russian Federation, and by Employees Filling Positions in these Organizations, Information on Income, Expenses, Property and Property-Related Obligations, Verification of the Accuracy and Completeness of the Information Provided and Compliance By Employees with the Business Conduct Requirements".

4.14. Decree of the Government of the Russian Federation dated January 09, 2014, No. 10 "On the Procedure to Report to the Certain Categories of Persons about the Receipt of a Gift in Connection with the Official Post or the Performance of the Official (Business) Duties, the Delivery and Appraisal of the Gift, Selling (Repurchasing) and Crediting of Funds Received from Sales".

4.15. Guidelines for the development and adoption by the organizations of measures to prevent and combat corruption, published by the Ministry of Labor of Russia on November 08, 2013.

4.16. Rosstandart Order dated October 26, 2016, No.1519-st "On Approval of the National Standard of the Russian Federation" (GOST R 56828.15-2016. National Standard of the Russian Federation "Best Available Technologies. Terms and definitions").

4.17. Order No.1/24-P of ROSATOM State Corporation dated January 20, 2015 "On Anti-corruption Work in Organizations Conducting Foreign Economic Activities."

4.18. Order No.1/1176-P of ROSATOM State Corporation dated December 04, 2015 "On Approval of the Regulations on Regulatory Documentation System in ROSATOM State Corporation".

4.19. Order No.1/78-P of ROSATOM State Corporation dated February 03, 2016 "On Approval of the Uniform Industry Guidelines on Monitoring of Enforcement and Compliance of the Anti-Corruption Internal Regulations of ROSATOM Organizations with the Anti-Corruption Legislation and the Roadmap for Monitoring of Enforcement and Compliance of the Anti-Corruption Internal Regulations of ROSATOM Organizations with the Anti-corruption Legislation".

4.20. Order No. 1/917-P of ROSATOM State Corporation dated September 30, 2016 "On Approval of the Uniform Industry Guidelines on the Disclosure by Organizations of ROSATOM State Corporation of the Information Regarding Detected Corruption and Other Legal Offenses, the Anti-Corruption Actions Taken including Actions to Identify and Mitigate a Conflict of interests".

4.21. Order No.1/186-P of ROSATOM State Corporation dated February 20, 2018 "On Approval of the Uniform Industry Procedure for Working with Hotline Messages in ROSATOM State Corporation and its Organizations".