

# CODE OF ETHICS



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# General

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This Code of Ethics establishes the expected behaviour of the employees of Kozloduy NPP EAD describing the major moral and ethical norms, principles and rules, which are complemented by the existing internal documents.

The Code of Ethics is intended to develop a shared value-based organisational culture, which promotes the Company's recognition as a socially responsible enterprise applying the principles of the UN Global Compact.

The Code of Ethics is implemented and followed by the Board of Directors, managers and all employees at Kozloduy NPP EAD. It should also be adhered to by the personnel of the external organisations, contractors, suppliers, subcontractors, etc. working at the site of the Company.

*Reputation is hard to build and easy to destroy. We are all responsible for building and reinforcing the reputation of Kozloduy NPP EAD.*



АЕЦ "КОЗЛОДУЙ"  
KOZLODUY NPP



АЕЦ "КОЗЛОДУЙ"  
KOZLODUY NPP

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# Our values

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## **Safety first**

We, the employees of Kozloduy NPP EAD, embrace and apply high requirements to ensuring nuclear safety, radiation protection, industrial safety, fire safety, environmental protection, and continuous enhancement of safety culture, as they are essential for achieving our long-term objectives and key to our reputation.

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## **Commitment, mutual respect, and recognition**

We, the employees of Kozloduy NPP EAD, believe that the contribution of our colleagues is of vital significance for our joint success and we respect the efforts made by each and everyone of us.

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## **Personal responsibility and integrity at work**

We bear personal responsibility for the work performed by us, for protecting the received information and the property of the Company, for adhering to the rules of conduct and business communication. We work in an environment of mutual trust, encourage different opinions, and communicate openly.

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## **Striving for excellence**

We, the employees of Kozloduy NPP, strive to continuously improve our performance in compliance with the highest standards, conduct self-appraisals, and learn from other people's experience.

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## **Continuous learning**

We, the employees of Kozloduy NPP, strive to acquire new knowledge and recognise the importance of knowledge retention and transfer.

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# 1. Safety first



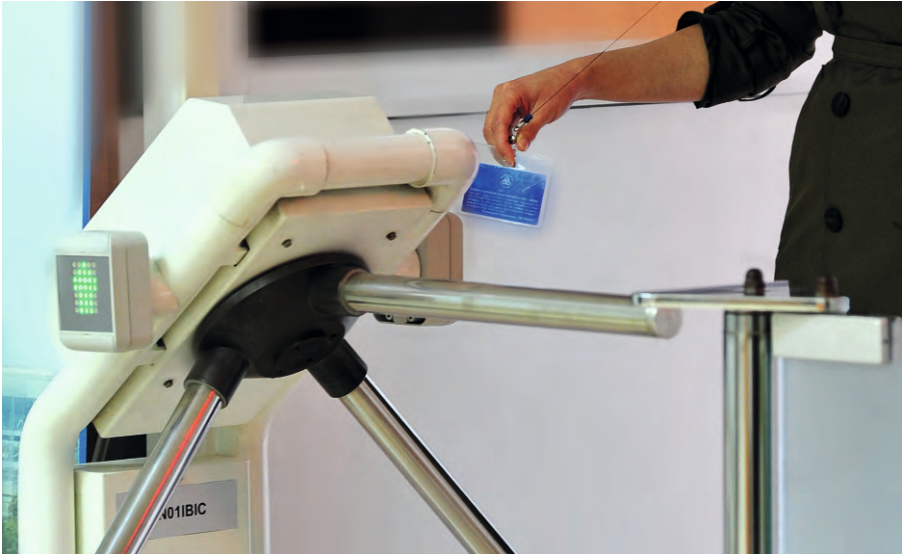
## Safety, health, and environment

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- Safety has an overriding priority at Kozloduy NPP.
- Ensuring safety and health protection of the employees in all activities is the key to reducing the risk of occurrence of events, incidents, accidents, and injuries.
- In safety-related decision-making the conservative approach prevails.
- Sustaining and continuous enhancement of safety culture of the employees is encouraged.
- Resources are provided for the prophylaxis and protection of the staff health.
- A systematic approach to environmental protection is applied and continuous efforts to minimise the environmental impact are made.

### **Every employee of Kozloduy NPP is expected to:**

- *adhere to all safety rules related to the work performed;*
- *demonstrate high safety culture at all times;*
- *be responsible for their own health and safety, and not jeopardize the health and safety of others;*
- *use protective clothing, personal and collective protective equipment;*
- *promptly inform about injuries, incidents, and unsafe labour conditions;*
- *demonstrate a questioning attitude, recognise and plan for the possibility of mistakes, latent issues, and inherent risks;*
- *make continuous efforts to protect the environment by using material and energy resources reasonably.*



## General security rules

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- The security rules ensure the security of both the employees of Kozloduy NPP and the general public.
- Maintaining a high level of security culture and its continuous enhancement is fostered at Kozloduy NPP. Nuclear security is the responsibility of everybody, and not only security officers.

### **Every employee of Kozloduy NPP is expected to:**

- *promptly inform the officers of the Ministry of Interior by calling 23-23 (0973 7-23-23) or 112, if they have detected any suspicious persons, objects, or situations;*
- *follow the guidance of the police authorities and security officers in the event of an unusual situation.*



## 2. **Commitment,** mutual respect and recognition





## Commitment to safety

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- The employees of Kozloduy NPP actively seek ways to strengthen their commitment to safety in order to positively contribute to its enhancement.
- The employees look for information regarding safety to ensure they are aware of their responsibilities in terms of providing safety, and have a clear idea about the threats which jeopardize safety.
- When discussing safety, feedback and information are duly provided regardless of difficulties.

### **Every employee of Kozloduy NPP is expected to:**

- *demonstrate through behaviour and actions their earnest attitude to safety;*
- *propose practical solutions for safety enhancement;*
- *intervene whenever they see a peer in an unsafe situation or breaching the safety rules;*
- *provide feedback on the current status of safety according to their experience and responsibilities;*
- *share their concerns when they believe that something is wrong although others may not be on the same opinion.*



## Teamwork

- The need for teamwork skills stems from the common interests of the Company's employees and managers that share the same values. With their personal behaviour and sense of responsibility, they set an example for their peers, and managers - to their subordinates.

### **Kozloduy NPP encourages teamwork involving peers who show mutual respect and support by:**

- *demonstrating readiness for teamwork in order to achieve the set goals, recognising their personal responsibility for the outcomes of their own performance and the teamwork;*
- *supporting, if required, their team members;*
- *openly discussing tasks and informing each other about the decisions taken;*
- *respecting, recognising, and listening to the opinion of their peers.*

## Mutual respect

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- Kozloduy NPP does not tolerate any acts of harassment, violence, or discrimination in the workplace based on nationality, culture, religion, ethnicity, gender, sexual orientation, age, or disability. These acts can take various forms, such as abuse of power, bullying, threats, physical assault, sexual harassment, etc.

### **Every employee of Kozloduy NPP is expected to:**

- *treat everyone with respect, politeness and fairness, and be responsible in exercising their powers;*
- *respect the rights and dignity of the individual and preclude any acts of harassment, violence, and discrimination;*
- *avoid conflict situations, and if any, seek to resolve them by keeping calm and controlling their behaviour;*
- *report in the event that they are a witness and/or a victim of harassment, violence, and discrimination in the workplace according to the procedure set out in the final provisions herein.*

## Equal employment opportunities

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- The Kozloduy NPP employee recruitment decisions are based on educational and qualification requirements, psychological and medical fitness for performing work involving exposure to ionizing radiation, regardless of race, nationality or ethnicity, origin, religion, age, gender, sexual orientation, marital status, and physical disabilities.
- Kozloduy NPP follows an open, fair, unbiased, and transparent recruitment policy, governed by the overriding priority of ensuring the safe operation of the nuclear installations.

### 3. Personal responsibility and integrity at work



## Personal responsibility for safety

- The employees of Kozloduy NPP recognise their personal responsibility for their own and others' safety when performing their daily activities.

### Every employee of Kozloduy NPP is expected to:

- *be responsible for ensuring their own safety and understand their role and responsibility for the safety of others;*
- *adhere to the requirements of the procedures and require the same from their peers and/or subordinates;*
- *take responsibility for their actions or failure to act, and in the event of a negative outcome to inform the affected parties.*





## Protection of documentation, property, and information

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- The Company property, documents, and information shall be used for the performance of official duties only. The staff of Kozloduy NPP is accountable for the adequate protection of the Company's property.
- The information is used and provided according to the Classified Information Protection Act (CIPA) and the Personal Data Protection Act (PDPA), strictly following the need-to-know principle; the same applies for information considered a trade secret which is provided "as formally requested", and for the intended purpose only.
- The staff do not use information, which is property of Kozloduy NPP, for personal or third party's interests in breach of the internal rules of the Company and the current legislation.
- Only individuals duly authorised by a CEO order may take photos and record videos in the areas within Kozloduy NPP.

### **The good reputation of Kozloduy NPP is a priceless asset, therefore every employee is expected to refrain from:**

- *expressing personal opinion in a manner which may be interpreted as the official position of the Company;*
- *revealing, publishing, or disclosing any facts and information that have become known to them during or in relation to the performance of official duties, except in the cases explicitly provided in the law;*
- *making personal statements and comments, including in media and social networks which could damage the Company's prestige and good reputation.*



## Office e-mail and Internet

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- The e-mail account, access to the Internet and files on Kozloduy NPP computer network storage devices are used to perform official duties only.
- Any use of the computer systems at Kozloduy NPP that does not comply with the requirements, including use which interferes with the work processes in the Company is unacceptable.
- The information systems of the Company shall not be used to share, create, disseminate, or store personal files regardless of whether texts or photos; the above is valid also for information that could insult and/or defame employees or partners of the Company.
- Direct users are responsible for the security of the computer information systems and the information that is property of Kozloduy NPP.

### **Every employee of Kozloduy NPP is expected to:**

- *be responsible for and protect the information they work with;*
- *regularly check their office e-mail;*
- *not reveal their access password to others;*
- *not share private files in the Company's information system.*

## Corruption, conflict of interests, gifts, and benefits

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- The Kozloduy NPP EAD employees counteract corruption and/or corrupt practices and other illegal actions in the Company.
- In the performance of their official duties, the employees are not influenced in their judgement by family ties, closeness, friendship, membership, and other types of relations with organisations or individuals that could result in conflict of interest, influence their work, decisions, or violate their professional approach.
- Acceptance of gifts from third parties for the purpose of motivating to perform or not perform official duties is not tolerated in Kozloduy NPP. Acceptance or giving of monetary gifts is forbidden.

### **Every employee of Kozloduy NPP is expected to:**

- *report any evidence on actual corrupt practices and/or breaches through the following e-mail address: [signal@npp.bg](mailto:signal@npp.bg), hotline: 62-62 (0973 7 6262), or anti-corruption reporting box placed at the entry of the Administrative Building;*
- *not use their position for their own private gain;*
- *not accept gifts unless they are advertising information materials;*
- *promptly notify their managers in case of suspicion of conflict of interests between their personal relations and business and their participation in the activities of the Company.*



## Conduct and communication in the workplace

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- Every employee of Kozloduy NPP is aware of and adheres to the Plant Work Regulations.
- Managers promptly inform the employees of Kozloduy NPP on issues of their concern.
- The employees maintain collegial relations with their co-workers and observe the level of authority in their business relationships.
- Operational decision-making meetings and work meetings are promptly announced, and the purpose for the meeting is clearly defined. In order to be effective, work meetings should not exceed 90 minutes.
- Being late, not turning off the cell phones, and talking during a work meeting is considered a lack of respect for others. Making negative personal comments and unfriendly behaviour are not tolerated in communication within the Company. Criticism, disagreements and disputes are resolved in an open dialogue.

## Dress code

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- The employees' appearance is part of the Company's organisational culture. The employees of Kozloduy NPP shall opt for conservative and modest patterns in their attire.
- Protective clothing and safety shoes shall be worn in industrial areas labelled with a blue solid line and while performing works under a work permit or instruction.
- The recommended everyday dress code at work is business casual or smart casual - trousers/jeans, a knee-length skirt/dress, shirt/blouse, blazer, jacket, or sweater.
- The formal business attire includes a suit, shirt, tie for men, and a suit jacket, trousers or knee-length skirt/dress for women, business closed-toed shoes and is required from everyone:
  - when participating in official events;
  - during representative or business meetings;
  - when communicating with or meeting business partners, representatives of state authorities, international organisations and institutions, etc., while performing professional/business duties;
  - when they represent the Company while performing their official duties.
- Extravagant accessories and clothes, transparent fabrics, deep necklines, bare backs, short skirts and shorts, sports wear, slippers, flip-flops, thin straps, bustier tops, tank tops, etc. are inadmissible to wear at work.



### **Every employee of Kozloduy NPP is expected to:**

- *be neat, clean and tidy at work;*
- *dress in compliance with the relevant requirements, consistent with the work environment and situation, and their attire shall not frustrate their effective work;*
- *not enter the administrative buildings and places to eat in dirty protective clothing and safety shoes.*

### **Political, public, and trade union activities**

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- Kozloduy NPP is a socially responsible Company and provides an opportunity for its employees to take part in public or trade union activities, if they wish, provided that this activity does not interfere with the work they perform in the Company.

### **Every employee of Kozloduy NPP is expected to:**

- *perform any public or trade union activity they might be involved in, outside their working hours and not bind in any way the Company's name with this activity;*
- *act so that these obligations shall not prevent them from performing their official duties;*
- *not carry out any political agitation or other similar activities in order to disseminate their political beliefs during working hours and within the Company.*

## 4. Striving for Excellence



## Striving for excellence

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- Every task in Kozloduy NPP is carefully planned to ensure that all required resources are provided.
- Striving for optimisation of processes and improvement of human performance is encouraged. Innovations, creative ideas and solutions are promoted.
- Issues are discussed freely and reporting of errors and problems at work is encouraged.
- Periodic self-assessments of the applied work practices are conducted.
- Internal and external operating experience is systematically collected and evaluated, and lessons learned are applied to improve our work.

### **Every employee of Kozloduy NPP is expected to:**

- *strive to improve the performance of their assigned work;*
- *perform their obligations in a competent, diligent, and responsible manner;*
- *give opinions and suggestions for improvement of the work performance;*
- *report in a timely manner for identified deviations, errors, damages and failures related to safety;*
- *cooperate in the performing of internal and external assessments.*

# 5. Continuous learning





## **Continuous learning - a mindset of transferring knowledge and experience**

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- Striving for continuous learning and acquiring the skills needed to ensure safe work performance are cultivated at Kozloduy NPP.
- The managers at all management levels require and are responsible for maintaining a high level of competence of their personnel, recognise the necessity for retention and transfer of nuclear knowledge, and encourage the sharing of the experience gained.
- All managers establish and encourage an atmosphere of sharing experience and knowledge among the employees at the workplace, as well as provide conditions for improvement of the workers' qualification.
- Every worker recognises the key importance of high competence and personal motivation for the reliable and safe operation of nuclear installations. Every employee strives to both maintain and improve their qualification level, and transfer knowledge to their peers.
- In Kozloduy NPP, opportunities for continuous learning are sought for, assessed, and implemented.

### **Every employee of Kozloduy NPP is expected to:**

- *take part into training sessions organised by the employer;*
- *maintain and improve their own qualification;*
- *transfer knowledge and experience gained to their peers;*
- *train a potential successors for their position.*



# Expectations to managers for leadership in ensuring the safe operation of Kozloduy NPP

## **Every manager within Kozloduy NPP is expected to:**

- *establish, advocate, and adhere to an organisational approach, whereby safety related issues are an overriding priority, and due attention is paid to them commensurate with their significance;*
- *acknowledge that safety is a matter of interaction between people, technology, and organisation;*
- *demonstrate and require behaviours of established high safety culture;*
- *take personal responsibility for the decisions made and for issues related to ensuring safety in the day-to-day activities;*
- *encourage and support all employees to perform their duties in a safe manner;*
- *pay routine visits to workplaces to observe the conditions and methods of work performance;*
- *meet on a regular basis with the staff to receive feedback, and encourage personal responsibility, including by sharing personal experience and response to critical situations;*
- *plan tasks in their structural unit, provide resources for their implementation, anticipate issues, and handle unexpected events;*
- *create a blame-free environment for reporting and discussing errors in their structural unit;*

- *focus the issue analysis on the causes for their occurrence, in order to avoid recurrence, rather than on who is to blame;*
- *promote a work environment that stimulates continuous improvement and development of the employees;*
- *establish an environment supporting the capture, retention, and transfer of nuclear knowledge and experience gained;*
- *be a role model.*





# Principles of the UN Global Compact

Kozloduy NPP EAD is a member of the UN Global Compact Network Bulgaria and in its activity applies the UNGC universal principles aimed at achieving a more sustainable and inclusive economy, namely:



## HUMAN RIGHTS

**Principle 1.** Respect and support the protection of human rights.

**Principle 2.** Make sure the Company is not complicit in human rights abuses.



## LABOUR STANDARDS

**Principle 3.** Uphold the freedom of association and the effective recognition of the right to collective bargaining.

**Principle 4.** Elimination of all forms of forced and compulsory labour.

**Principle 5.** Effective abolition of child labour.

**Principle 6.** Eliminate discrimination in respect of employment and occupation.



## ENVIRONMENT

**Principle 7.** Support a precautionary approach to environmental challenges.

**Principle 8.** Undertake initiatives to promote greater environmental responsibility.

**Principle 9.** Encourage the development and diffusion of environmentally friendly technologies.



## ANTI-CORRUPTION:

**Principle 10.** Support anti-corruption initiatives and policy of transparency.

# Final provisions

- The Code of Ethics was developed in compliance with IAEA Nuclear Energy Series, No. NG-T-1.2 Establishing a Code of Ethics for Nuclear Operating Organizations.
- The requirements of the WANO Principles, Leadership Fundamentals to Achieve and Sustain Excellent Station Performance, and IAEA GSR Part 2, Leadership and Management for Safety have been considered while developing this document.
- The Code of Ethics was discussed with the representatives of the trade union organisations and the employees of Kozloduy NPP EAD.
- The Code of Ethics is published on the corporate web site ([www.kznpp.org](http://www.kznpp.org)) and in the internal information system Intranet.
- The Code of Ethics is observed by the staff of Kozloduy NPP EAD and is distributed and explained to the Company's contractors who work on site.
- Upon employment by the Company, the line manager is obliged to introduce the new employee to the expectations set out in this Code.
- If case of any identified deviation or factors leading to breaching the ethical rules and principles, a concern may be communicated through:
  - reporting to the line manager and in case the occurring issues are not properly addressed, escalate the matter to the senior manager;
  - e-mail address: [signal@npp.bg](mailto:signal@npp.bg);
  - hotline: +359 973 76262;
  - ethical issues reporting boxes.
- All concerns reported are carefully investigated in full confidentiality.
- A breach of the Code of Ethics is subject to sanctions under the procedure set out in the Plant Work Regulations.
- The Code of Ethics comes into force on the date of its signing and is valid until it is explicitly cancelled.
- Any amendments or supplements to this document shall be made upon suggestions by the Employer, employees and workers, or trade union organisations in line with the procedure for its approval.





# OUR CORE VALUES

