

# CODE OF ETHICS

our values



**SAFETY FIRST**



**COMMITMENT, MUTUAL RESPECT, AND RECOGNITION**



**PERSONAL ACCOUNTABILITY AND INTEGRITY AT WORK**



**STRIVING FOR EXCELLENCE**



**CONTINUOUS LEARNING**

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We, the employees of Kozloduy NPP EAD,

**AIMING** to comply with the principles of publicity and transparency, free and fair competition,

**PROMOTING** the application of standards of integrity and respect for human rights as part of our policies,

**IN SUPPORT** of the implementation of European and international standards in the field of prevention and counteraction of corruption, good governance, and risk management,

**COMMITTING** to contribute to environmental protection and sustainable development by integrating economic, environmental, and social considerations when making business decisions in our Company,

**ACCEPT** this **CODE OF ETHICS**.





# General

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This Code of Ethics defines the expected behaviour of Kozloduy NPP EAD employees by describing the basic moral and ethical norms, principles and rules complemented by the internal documents in force.

The Code of Ethics aims at developing an organisational culture based on shared values that helps reinforce the Company as a socially responsible entity in the application of the universal principles of the UN Global Compact.

The moral and ethical norms, principles, and rules defined in this Code are a foundation in building and maintaining a supportive work environment for establishing unity in the declared goals and creating conditions for their achievement.

Shared values in the Company are a harmonising model of organisational culture, uniting personal differences in values in all their aspects of diversity - national, ethnic, religious, political, and other inherent beliefs and assumptions about reality - in the name of the highest priority at work, which is safety.

Leadership is a key management approach to reinforce values and expectations about staff behaviour and maintain a high level of safety culture, as well as to prevent/reduce the influence of incentives that could provoke wrongful, unethical actions by management and staff.

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

The management of Kozloduy NPP EAD accepts as valid and strives to comply with the basic requirements of the international standards ISO 37001 Anti-Bribery Management Systems and ISO 37002 Whistleblowing Management Systems.

Reputation is hard to gain but easy to lose.

We are all responsible for building and reinforcing the reputation of Kozloduy NPP EAD.

# Our values

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## **SAFETY FIRST**



We, the employees of Kozloduy NPP EAD, embrace and apply the high requirements for ensuring nuclear safety, radiation protection, industrial safety, fire safety, environmental protection, and continuous enhancement of safety culture as essential for the successful achievement of our long-term goals 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 importance for our shared success and we respect the efforts made by each and every one of us.

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## **PERSONAL ACCOUNTABILITY AND INTEGRITY AT WORK**



We are personally accountable 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, we conduct self-assessments, and learn from the experience of others.

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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.



# SAFETY FIRST



# Safety, health, and environment

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*We, the employees of Kozloduy NPP EAD, embrace and apply the high requirements for ensuring nuclear safety, radiation protection, industrial safety, fire safety, environmental protection, and continuous enhancement of safety culture as essential for the successful achievement of our long-term goals and key to our reputation. Together, we create a secure and safe environment.*

- Safety has an overriding priority at Kozloduy NPP.
- Ensuring safety in all activities is the key to reducing the risk of occurrence of events, incidents, accidents, and injuries, and protecting the health of the employees.
- The requirements of labour legislation and standards for health and safety at work have been integrated, encouraging personal responsibility for observance and compliance with the laws governing the activity performed, as well as the adopted internal rules.
- The conservative approach prevails in safety-related decision-making.
- Sustaining and continuously enhancing safety culture of the employees is encouraged.
- Resources are provided for the preventive healthcare and health protection of the staff.
- A systematic approach to environmental protection is applied and continuous efforts are made to minimise the environmental impact and mitigate climate change consequences.

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

- adhere to all safety rules related to the work performed;
- demonstrate a high level of safety culture everywhere and in everything;
- be responsible for their own health and safety, and to not jeopardize the health and safety of others;
- use working clothing, personal protective equipment, and safeguards for collective protection;



# Safety, health, and environment

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- promptly inform about injuries, incidents, and unsafe labour conditions, and fully cooperate in investigating such injuries, incidents, and conditions;
- demonstrate a questioning attitude, admit mistakes and assume the possibility of mistakes, latent issues, and existing risks;
- make continuous efforts to protect the environment by using material and energy resources reasonably;
- comply with the rules for separate collection of waste;
- avoid polluting the environmental components – water, soils, air, etc., with their actions.



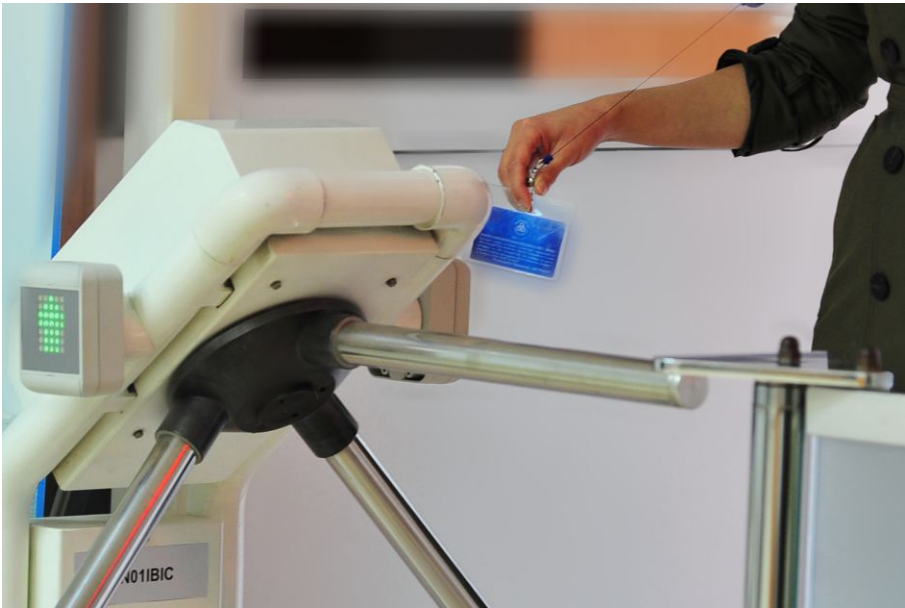
# General security rules

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- The security rules ensure the security of both the employees of Kozloduy NPP and the general public.
- Kozloduy NPP fosters maintaining a high level of security culture and its continuous enhancement. Nuclear security is the responsibility of everyone, 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.





# COMMITMENT, MUTUAL RESPECT, AND RECOGNITION



# Commitment to safety

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*We, the employees of Kozloduy NPP, have a major role for maintaining and improving safety, we believe that the contribution of our colleagues is of vital importance for our shared success, and we respect the efforts made by each and every one of us.*

- The employees of Kozloduy NPP actively commit themselves to ensure and enhance safety as an overriding priority in the performance of all activities.
- The employees of Kozloduy NPP demonstrate their personal responsibility for safety by providing conscious support through a conscientious and responsible attitude to work.
- When discussing safety issues, accurate feedback and reliable information are duly provided even when this is difficult.

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

- demonstrate through their 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 safety status 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

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- The need for teamwork skills stems from the common interests of the Company's employees and managers who share the same values. With their personal behaviour and sense of responsibility, they set an example for their peers, and managers – for 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;
- providing assistance, if required, to 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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- No direct or indirect discrimination is allowed at Kozloduy NPP in employment relations and in the everyday life at the workplace. Workers and employees are not treated differently on the basis of their sex, race, nationality, ethnicity, genetic information, citizenship, origin, religion or faith, education, beliefs, political affiliation, personal or social status, disability, age, sexual orientation, property status, membership in trade unions or other social organisations and movements, as well as differences in the duration of contracts and the length of working hours.
- Kozloduy NPP promotes the pursuit of gender balance in the Company by stimulating the representation of women and increasing their contribution.

## Every employee of KOZLODUY NPP is expected to:

- treat everyone with respect and politeness;
- 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 management of Kozloduy NPP makes its employment decisions on the basis of educational and qualification requirements, psycho-physiological testimonials, medical indications for work in an environment with ionising radiation, regardless of race, nationality or ethnicity, origin, religion, age, gender, sexual orientation, marital status, and physical disabilities.
- Kozloduy NPP maintains an open, impartial, and accessible recruitment policy which is subordinated to the main priority of ensuring the safe operation of nuclear facilities.
- The Company's relationship with suppliers is based on legal, efficient, upright, and honest behaviour.
- The Company encourages its partners to apply the values and principles set out in this Code, and when the Code's provisions are of an imperative nature, to make sure that they are complied with.





# PERSONAL ACCOUNTABILITY AND INTEGRITY AT WORK



# Personal responsibility for safety

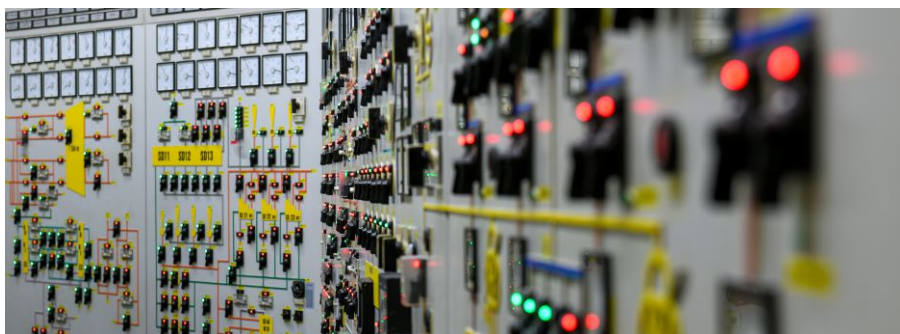
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*We are personally accountable for ensuring safety in our work, for protecting the received information and the property of the Company, for adhering to the rules of conduct and business communication. We work in an environment of mutual trust, encourage different opinions, and communicate openly.*

- The employees of Kozloduy NPP recognise their personal responsibility for ensuring 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 non-compliance, inform the affected parties;
- openly and honestly present to the management and/or their line managers the issues they face in the work process or in the performance of their assigned tasks, consulting with them in order to resolve these issues.



# Protection of documentation, property, and information

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- The Company's property, documents, and information are used for the performance of official duties only. The employees of Kozloduy NPP are accountable for the adequate protection of the Company's property.
- The information is used and provided according to the Classified Information Protection Act (CIPA), Regulation (EU) 2016/679, the Trade Secret Protection Act, and the Personal Data Protection Act (PDPA), strictly following the internal rules and procedures and the "need-to-know" principle. Information identified as trade secret is processed and provided "as formally requested", and for the specifically assigned task or activity only.
- The Company guarantees confidentiality in the use and storage of the provided personal information, in accordance with the Personal Data Protection Act. Employees are forbidden to use the information for purposes other than those for which the data was collected.
- The Company observes full confidentiality regarding the company information and any information that poses a threat to the Company's interests, its competitiveness, or reputation.
- 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.
- Taking photos and recording videos in the designated areas on the territory of Kozloduy NPP is carried out in compliance with internal rules and procedures.
- Interaction and communications with stakeholders and contractors are carried out on the basis of integrity, transparency, and mutual respect.
- The Company values its relations with the public and the media and communicates openly, proactively, and responsibly to ensure timely, accurate, and objective information.
- Information relating to the Company is provided to the public and the media (including through social networks) only by authorised persons.
- The Kozloduy NPP logo is used only for the purposes of the Company after the permission of the Chief Executive Officer.



# Protection of documentation, property, and information

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**The good reputation of KOZLODUY NPP is an invaluable asset, therefore every employee is expected to refrain from:**

- expressing a personal opinion in a way that could be interpreted as the official position of the Company;
- revealing, publishing, or disclosing facts and information that became known to them during or on the occasion of the performance of official duties, including information relating to labour remuneration, except in the cases expressly mentioned by the law;
- making personal statements and comments, including in the media and social networks, and publishing in their personal profiles photos that could damage the Company's prestige and good reputation, as well as content that contains confidential, internal, financial, business information, trade secrets or other secrets protected by law.



# Computer security

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- The information created and stored in the Company's computer network is the property of Kozloduy NPP. The information systems and everything stored and transmitted through them are used only for the approved purposes and in the authorised ways.
- The password for access to the information system or to a separate database is personal and is not shared or reassigned. Attempts to circumvent or overcome the information security measures in place are not permitted.



# 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 Kozloduy NPP computer systems that does not comply with the requirements, including use which interferes with the work processes in the Company, is not permitted.
- The information systems of the Company are not used to share, create, disseminate, or store personal files regardless of whether texts or multimedia; 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;
- use the mandatory Company template when composing and signing business e-mails.



# Whistleblowing on wrongdoing, corruption, conflict of interests

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- Kozloduy NPP EAD employees counteract corruption and/or corrupt practices and other illegal actions in the Company.
- Employees adhere to the moral and ethical principles set out in this Code and Bulgarian legislation, both in their contacts with clients and partners, and with all institutions in the country in their individual official relationships;
- 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 disrupt 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. Kozloduy NPP employees do not accept or offer gifts and benefits or the promise of benefits to influence decision-making in connection with the performance of their official duties.

## Every employee of KOZLODUY NPP is expected to:

- report any evidence on actual corruption practices and/or wrongdoings through the following e-mail address: **signal@npp.bg**, and the hotline: **62-62 (0973 7 6262)**, or alert boxes;
- not use their position for their own private gain;
- not accept gifts unless they are advertising and 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 and promptly report circumstances that may lead to a potential conflict of interest;
- not use their official position for their own personal interests, the interest of their family or the interest of third parties;
- not allow themselves to be placed in financial or other dependence in relation to third parties which may affect the performance of their official duties or disrupt their professional approach concerning certain issues.



# Behaviour 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.
- Employees maintain healthy collegial relations with their co-workers and observe the level of authority in their business relationships.
- Operational meetings and work meetings are promptly announced, and the purpose for the meeting is clearly defined. For the purpose of efficiency, the duration of work meetings is limited to 90 minutes.
- Being late, not keeping the cell phones silent, and talking during a work meeting are considered disrespectful to others.
- Making negative personal comments and unfriendly behaviour are not tolerated in communication within the Company. Criticism, disagreements, and disputes are resolved in a civilized manner through an open dialogue.

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

- treat their colleagues with respect;
- comply with the rules for business communication;
- introduce themselves with their surname and/or position when answering an office call;
- set their mobile phone to silent mode during official and work meetings, and if there is an urgent need to make or take a phone call to do it outside the meeting room;
- communicate with their colleagues in the workplace without disturbing others;
- fill their working time with job tasks and duties;
- come to work in good health and not be under the influence of alcohol or other intoxicating substances.

# Corporate identity

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- Every worker and employee contributes to building the corporate identity of the Company. The appearance and behaviour of employees are factors in effective public communication.
- The appearance of employees is part of the organisational culture of the Company. The employees at Kozloduy NPP shall opt for conservative and modest patterns in their attire.
- Protective clothing and safety shoes shall be worn in industrial areas marked with a blue solid line and while performing works under a permit-to-work or instruction.
- On the plant site, the automated access control system pass is worn in a visible place on the upper body, except for certain activities when it is worn in accordance with occupational safety requirements.
- The recommended everyday dress code at work is business casual or smart casual – trousers/jeans, knee-length skirt/dress, shirt/blouse, blazer, jacket, or sweater.
- The formal business attire includes suit, shirt, tie for men, and 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.



# Corporate identity

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## **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;
- observe decency and a business like appearance in clothing, in keeping with the work performed;
- 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 do not prevent them from performing their official duties;
- not carry out any political advertising or other similar activities in order to disseminate their political beliefs during working hours and within the Company.





# STRIVING FOR EXCELLENCE



# Striving for excellence

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*We, the employees of Kozloduy NPP, strive to continuously improve our performance in compliance with the highest standards, conduct self-assessments, and learn from the experience of others.*

- Every task at 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. Innovation, initiative, the search and offering of ideas and solutions are tolerated.
- 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 conducting internal and external assessments.

# CONTINUOUS LEARNING



# Continuous learning – a proclivity for transferring knowledge and experience

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

- 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 create and encourage an environment for sharing experience and knowledge among employees in their units, as well as provide conditions for improving the qualifications of employees.
- Every worker or employee recognises the key importance of high competence and personal motivation for the reliable and safe operation of nuclear installations. Every worker or 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, assessed, and implemented.

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

- take part in 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.



# Leadership and personal responsibility for safety for high organisational performance

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*At our plant, safety is a shared value that is built on leadership behaviour and personal example at every level. Leadership for safety is not a function of the job position, but an expression of professionalism and care, insofar as every employee can inspire through personal example, coach and model the behaviour of their colleagues in the pursuit of excellence. We apply a Leadership Competency Framework (LEADER) through which we communicate expected behaviour, value and encourage its manifestation in every team member, however it is mandatory for the management team.*

*We, the managers at Kozloduy NPP EAD, set a personal example, ensure an environment of impartial treatment to employees, promote a working environment of openness, and maintain a high standard of professionalism, we are responsible for maintaining honest, ethical, and professional relationships between employees.*

**To demonstrate the leadership role of the management team in Kozloduy NPP in ensuring safe operation and creating a working environment based on openness, integrity, and accountability, each manager is expected to:**

- establish a vision and goals for continuous improvement of activity performance and communicate their expectations to employees in relation to this;
- exercise and develop skills necessary to improve their leadership abilities;
- promotes ownership and personal accountability for nuclear safety among staff;
- set a personal example and model the desired behaviour of nuclear professionals among staff;
- communicate openly, honestly, act with integrity, and explain the reasons for their actions and decisions;
- seek and listen to diverse ideas, concerns, questions, and opinions, and be receptive to them;
- detect, encourage, and reward individual and team achievements;
- stimulate teamwork, encouraging communication and cooperation between persons with different functions and at different levels;



- actively support the development of their employees and coach them by sharing their knowledge, professional and leadership experience, ensuring continuity in the organisation;
- be proactive in identifying individuals with leadership potential, support them, and provide them with opportunities for development;
- establish, advocate, and adhere to an organisational approach to safety that stipulates that, as an overriding priority, issues relating to safety receive the attention warranted by their significance;
- acknowledge that safety encompasses interactions between people, technology, and the organisation;
- demonstrate and require behaviour of a strong safety culture;
- take personal responsibility for the decisions taken and for matters related to ensuring safety in daily activities;
- take timely action to address any signs of deviations, even if they are minor;
- encourage and foster all employees to perform their tasks safely;
- ensure an environment where employees are treated fairly;
- 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 accountability, including by sharing their personal experience and response to difficulties in work performance and critical situations;
- require, apply, and encourage the use of human error prevention techniques;
- plan tasks in their organisational unit, provide resources for their implementation, anticipate issues, and handle unexpected events;
- foster culture that encourages detection, registering, and remedying of non-conformances;
- create an atmosphere within their team where errors and issues are reported and discussed in accordance with the 'no blame' principle;
- recognise the nature of human errors and seek to understand their causes before drawing conclusions or blaming;

- focus the issue analysis on the causes for their occurrence in order to avoid recurrence rather than on who is to blame;
- create a work environment that encourages continuous personnel improvement and development;
- create an ambience that supports accumulation, retention, and transfer of nuclear knowledge and experience;
- create an environment that supports communication regarding the significance, scope, and measures to prevent and combat corruption and wrongdoings;
- be a role model.



# Leadership competency framework

Development of leadership for safety at Kozloduy NPP is based on an established framework of leadership competencies, aligned with regulatory requirements, safety standards set by international organisations, and the Company's long-term strategic goals. The leadership competency framework is a tool for communicating what behaviour is required, valued, recognised, and rewarded regarding specific job positions. It ensures that staff have a common understanding of the Company's values and expected behaviour at work.

Leadership competencies are assessed and developed at three levels:	
<b>Competency level</b>	<b>Employees</b>
<b>Level 1 – Leads</b> <i>Demonstrates the highest standards. Responsible for decisions. Takes on the role of leader and innovator.</i>	<b>First and second level managers</b>
<b>Level 2 – Inspires</b> <i>Motivates, models, and influences behavioural patterns. Executes and manages processes.</i>	<b>Third and fourth level managers</b>
<b>Level 3 – Performs</b> <i>Confidently and independently applies behavioural models. Responsible for individual performance and contribution to the team.</i>	<b>Employees with high potential</b> for development (performance rating above 4.49, talents, deputies in key positions)

The leadership competencies that should be demonstrated by the Company's staff are organised as a matrix, including a general description (characteristics) of the competency and assessment indicators for each level:

<b>L</b>	<b>Leadership accountability and commitment to safety.</b> The ability of leaders to take responsibility for their own actions and decisions and those of their subordinates, to act consistently and ethically, and to demonstrate commitment to the goals of the Company and the teams.
<b>E</b>	<b>Embracing innovation and openness to change.</b> The ability to generate new ideas, solutions, and approaches, as well as the willingness to adapt quickly and effectively to a changing environment.
<b>A</b>	<b>Articulating long-term vision and strategic direction.</b> The ability to anticipate future trends and needs, to formulate a long-term direction for development, and to build strategies that ensure the Company's sustainability and success and guarantee safe and reliable operation.
<b>D</b>	<b>Driving effective communication.</b> The ability to clearly and convincingly convey and receive information, to ensure understanding between different parties, and to use communication as a tool for cooperation and achieving goals.
<b>E</b>	<b>Empowering and engaging people.</b> The ability to support the professional growth of team members, to stimulate their commitment and productivity.
<b>R</b>	<b>Recognising and motivating staff.</b> The ability to build a positive and motivating team and organisational culture by acknowledging, appreciating, and rewarding employees for their contributions, skills, and hard work.

# Final provisions

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- 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 in the development of this document.
- The OECD Guidelines on Corporate Governance of State-Owned Enterprises have been considered in the document update.
- 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' staff 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.
- In case of any identified deviations or factors leading to breaching the ethical rules and principles, an alert may be communicated through:
  - reporting to the line manager and in case the occurring issues are not properly addressed, escalate the matter to the higher-ranking manager;
  - e-mail address: [signal@npp.bg](mailto:signal@npp.bg);
  - hotline: +359 973 76262;
  - boxes for alerts on corruption, conflict of interest, as well as under the Protection of Persons Who Report or Publicly Disclose Information on Breaches Act.
- All the alerts are carefully investigated in full confidentiality by the Corruption Prevention Department and the best solution is sought.
- 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 proposals by the Employer, employees and workers, or trade union organisations in line with the procedure for its approval.

# THE TEN PRINCIPLES of the UN Global Compact

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In its activities, Kozloduy NPP EAD applies the universal principles of the Bulgarian Network of the UN Global Compact aimed at achieving a more sustainable and inclusive world economy, namely:



## HUMAN RIGHTS:

**Principle 1.** Businesses should support and respect the protection of internationally proclaimed human rights.

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



## LABOUR STANDARDS:

**Principle 3.** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

**Principle 4.** The elimination of all forms of forced and compulsory labour.

**Principle 5.** The effective abolition of child labour.

**Principle 6.** The elimination of discrimination in respect of employment and occupation.



## ENVIRONMENT:

**Principle 7.** Businesses should 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.** Businesses should work against corruption in all its forms, including extortion and bribery.



# UN 2030 Sustainable Development Goals

In 2015, with unanimous agreement, the UN adopted the Development Agenda “Transforming our world: the 2030 Agenda for Sustainable Development”. Through its activities, the Company contributes directly to achieving the goals of ensuring affordable and clean energy, protecting the environment, sustainable economic development and consumption, respect for human rights, gender equality, and others.

