



**AKKUYU
NUCLEAR**

Ankara

20 September 2016

No. 67

ORDER

On approval and enactment of the Anti-Corruption Policy of “AKKUYU NUCLEAR” JSC

In order to implement Rosatom State Corporation Order dated 14.05.2015 no. 1/364-II “On approval of Rosatom State Corporation Unified Industry Anti-Corruption Policy” and to enhance the anticorruption activities at “AKKUYU NUCLEAR” JSC (hereinafter - the Company),

IT IS HEREBY ORDERED:

1. The Company’s Anti-Corruption Policy (hereinafter: the Policy, the Appendix) shall be approved, enacted and followed.
2. Heads of the Company units shall bring this Order to the knowledge of their employees (against signature) and submit the sign-off lists to Security Directorate by 30.09.2016.
3. The Company Order dated 14.04.2016 no. 19 “On approval and enactment of Anti-Corruption Policy at “AKKUYU NUCLEAR” JSC” shall be deemed invalid.
4. The Company’s local policies shall be adjusted and aligned with the Policy provisions.
5. Deputy CEO for Security Mr. Kudinov S.A. shall follow up this Order.

Acting CEO

/signature/

O.V. Titov

A.A. Kataev, tel. 31 -25

Mustafa Kemal Mahallesi, 2159 sokak, No:14 Söğütözü, Çankaya 06510/ Ankara TÜRKİYE Tel: +9031244260006 Fax: +903124426016 www.akkuyu.com info@akkuyu.com

Paveletskaya Sq., h. 2, bld. 2, Moscow, 115054, Tel.: + 74952589900

Appendix
APPROVED by order of
AKKUYU NUCLEAR JSC
as of 20/09/2016 No. 67

ANTICORRUPTION POLICY OF
AKKUYU NUCLEAR JSC

Contents:

| | |
|--|------------|
| 1. Purpose and Scope | 3 |
| 2. Terms and Abbreviations | 3 |
| 2.1. Terms..... | 3 |
| 2.2. Abbreviations | 7 |
| 3. Subject Matter | 7 |
| 3.1. Policy Objectives..... | 7 |
| 3.2. Policy Tasks | 8 |
| 3.3. Policy Principles..... | 8 |
| 3.4. Policy scope and the range of persons to whom it applies | 9 |
| 3.5. Anticorruption activities 9Anticorruption | Activities |
| 9 | |
| 4. Participants and Roles | 9 |
| 4.1. Appointment of Responsible Employees | 9 |
| 4.2. Definition and Allocation of the Participants' Functions and Responsibilities.... | 10 |
| 5. List of Anticorruption Measures, Standards and Procedures..... | 16 |
| 5.1. Corruption Risk Assessment | 16 |
| 5.2. Conflict of Interest Prevention and Management | 17 |
| 5.3. Development and Implementation of Standards and Procedures | 19 |
| 5.4. Investigation and Processing of Corruption Allegations | 20 |
| 5.5. Employee Counselling and Training..... | 21 |
| 5.6. Forming the Fundamentals of the Employees' Law-Abiding Behavior | 21 |
| 5.7. Internal Control and Audit | 22 |
| 5.8. Business Courtesies and Gifts-Giving Procedure | 23 |
| 5.9. Anticorruption Precautions when Interacting with Counterparties | 24 |
| 5.10. Interaction with State Authorities | 25 |
| 5.11. Cooperation with Law-Enforcement Authorities..... | 26 |
| 5.12. Engagement in Corporate Initiatives..... | 27 |
| 6. Liability | 27 |
| 7. Regulatory References | 28 |
| 8. Amendment Procedure..... | 28 |
| 9. Follow-up Responsibility | 28 |

1. Purpose and scope

1.1. Anticorruption policy (hereinafter: Policy) defines uniform principles, regulations, procedures and requirements whereby certain functions and activities intended to prevent and combat corruption at AKKUYU NUCLEAR JSC (hereinafter: Company) shall be set up and implemented.

1.2. The Company's corruption prevention and control activities shall be performed in compliance with the law of the Republic of Turkey and the Russian Federation, as well as the requirements of local policies (hereinafter: LPs) and regulatory and guidance documents (hereinafter: RGD) of Rosatom State Atomic Energy Corporation (hereinafter: Rosatom) and the Company which define and regulate their anticorruption efforts.

1.3. The Company's policies and administrative documents must not conflict with the Policy provisions; in the event of any contradictions, such documents must be adjusted so as to correspond hereto, unless the Company's CEO elects to eliminate such contradictions by amending the Policy.

1.4. Depending on the organizational and staff structure, headcount, specific character of activity, in-house needs and other circumstances that render the Company unable to implement the Policy provisions in full, the Company may, upon prior written agreement with the Company's anticorruption activity coordinator, issue internal anticorruption LPs and RGD that reflect some of the Policy provisions while contradicting none of them.

1.5. In case of any disputes (questions) related to the implementation of anticorruption regulations, principles, procedures and standards, one should be guided by the requirements of this Policy, which is the Company's fundamental regulatory and administrative document for development and implementation of anticorruption activities and which prevails over the rest of LPs and RGD that regulate the Company's anticorruption activity.

2. Terms and abbreviations

2.1. The following terms shall be used herein:

Anticorruption Policy - a unified fundamental document comprising a set of interrelated principles, regulations, procedures, specific functions and actions intended to prevent and combat corruption at the Company.

Anticorruption Law - fundamental legal enactments of the Republic of Turkey and the Russian Federation in the area of anticorruption activities.

Anticorruption Clause - a section in the Company's contracts and agreements declaring the implementation of the Anticorruption policy and prohibiting any corruption offences and other offences.

Anticorruption Obligations - obligations undertaken by bidders that take part in Company-initiated procurement procedures to comply with and to follow the principles, regulations, procedures and requirements of the Anticorruption policy, including the obligation to avoid committing corruption offences and other offences, to provide comprehensive and reliable information on their companies' chain of owners, including beneficiaries and ultimate beneficiaries, and on the members of their companies' executive bodies, with supporting documents attached.

Anticorruption Monitoring - monitoring of the Company's anticorruption activities carried out in order to assess the efficiency of such activities, assess and forecast corruption factors and reports, evaluate and analyze the data gathered in the course of such monitoring, forecast future developments and trends and design adequate responses thereto.

Bribery - giving a bribe to an official, foreign official or an official of a public international organization personally or through an intermediary (including having a bribe passed to another individual or legal entity by an official's order).

Business Courtesies - merchandise gifts and/or entertainment expenses defined in compliance with the Company's local policy.

Officials - persons who exercise, on a temporary or permanent basis or by special authority, the functions of a public authority or managerial, organizational or administrative functions in government authorities, local self-government authorities, public and municipal institutions, state corporations, as well as military institutions of the Republic of Turkey and the Russian Federation and other armed forces or military formations of the Republic of Turkey and the Russian Federation.

Abuse of Authority - the use by a person performing managerial functions in a business company or another organization of his/her authority contrary to legitimate interests of such organization for the purpose of deriving profit and benefits for oneself or another person or causing harm to another person if such action inflicts substantial damage upon the rights and legitimate interests of any citizens or organizations or to legitimate interests of a community or the state.

Commercial Bribery - unlawful transfer of cash, securities, other property or valuable services to a person performing managerial functions in a business company or another type of organization,

granting other property interests for the performance (omission) of actions in favor of the giver and in connection with the receiver's official position. Illegal receipt of cash, securities, other property by a person performing managerial functions in a business company or another type of organization, as well as illegal use of any valuable services or other property interests for the performance (omission) of actions in favor of the giver and in connection with the receiver's official position.

Counterparty - any Russian or foreign legal entity or individual, with whom the Company enters into contractual relationship with the establishment of various scope of rights and liabilities (except labor relationship) and with whom it has no common goals.

Conflict of Interest - a situation when personal interest (direct or indirect) of a Company employee affects or may affect the proper fulfillment of his/her employment (job) duties and when there develops or may develop a conflict between the personal interest of a Company employee and the Company's rights and legitimate interests that may damage the Company's interests.

Corruption (this definition applies to all entities regardless of their form of ownership) - bribery, abuse of authority, commercial bribe or other illegal use by employees of their position contrary to the company's legitimate interests for the purpose of deriving profit and benefits for oneself or third persons in the form of cash, securities, other property or valuable services or other property interests, or illegitimate granting of such benefits to the said person by other individuals, as well as the performance of the said actions on behalf or in favor of a legal entity.

Corruption Offence – a culpable act (or omission) that includes attributes of corruption and carries criminal, administrative, civil or disciplinary liability under the law.

Personal Interest - interest of a Company employee in receiving non-material values and other intangible benefits. No career promotion or recognition awards may be considered personal benefit.

Personal Benefit - an opportunity for a Company employee to gain income in the form of cash, securities, other property or valuable services or other property interests for him/herself or third persons in connection with the fulfillment of his/her job duties. An employee's personal benefit shall mean only the income that is not deemed by the Company's local policies a remuneration paid to the said employee or an incentive benefit.

Financial Benefit - economic benefit in monetary form

or in kind that may be evaluated and defined as an income according to the tax law of the Republic of Turkey and the Russian Federation.

Illegal Compensation on behalf of a Legal Entity -

Illegal giving, offering or promise of any money, securities or other property to an official performing managerial functions in a commercial or another organization, a foreign official or an official of a public international organization on behalf or for the benefit of a legal entity, rendering of any property-related services to such person, as well as granting any property interests for performance (omission), for the benefit of the said legal entity, of any action by an official, a person performing managerial functions in a commercial entity or another type of organization, a foreign official or an official of a public international organization insofar as such action (omission) is related to such person's official position.

Illegal Employment or Involvement in Work Performance or Service Rendering of a State or Municipal Official or a Former State or Municipal Official - a legal entity entering into an employment agreement with, or involving in work performance or service rendering under a short-term contract, a state or municipal official holding a post included in the list established by legal enactments or a former state or municipal official who has held such post, in contravention of the requirements set forth by the law of the Republic of Turkey or the Russian Federation.

Responsible Employees and Units - employees and business units of the Company appointed responsible for prevention of corruption and other offences in accordance with the local regulatory acts.

Other Offences - offences that affect the Company's competence, i.e. concern the Company's rights and legitimate interests.

Mediation in Bribery - direct passing of a bribe by order of the briber or bribetaker or other assistance to the briber and (or) bribetaker in arranging or implementing an agreement on taking and giving a significant bribe between them. Promise or offer of mediation in bribery.

Preconflict Situation - a situation when the Company employees or procurement process initiator / tendering authority employees or representatives develop a personal interest that may lead to a conflict of interest in the course of performing their official or professional activities.

Corruption Prevention - the Company's operations aiming to

introduce the elements of corporate culture, organizational structure, rules and procedures enshrined in local policies and regulatory and guidance documents so as to ensure prevention of corruption offences.

Corruption Control - the Company's operations within its authority aimed at: a) corruption prevention, including identification and elimination of causes of corruption (corruption avoidance);

b) minimization and (or) mitigation of consequences of corruption offences.

Corruption Avoidance - the Company's operations aiming to identify, prevent and eliminate causes of corruption.

Company Employee - any full-time or seconded employee of the Company, including top management, business unit managers and persons rendering services to the Company under short-term contracts.

Bidder - Any legal entity or several legal entities acting in favor of one Bidder regardless of the business legal form, ownership form of, or any individual or several individuals acting in favor of one Bidder, including a private business owner or several private business owners acting in favor of one Bidder that meet the requirements set forth by the customer in compliance with the Procurement Standard of Rosatom State Atomic Energy Corporation.

2.2. The following abbreviations shall be used in this Policy:

Rosatom - Rosatom State Atomic Energy Corporation.

Standard - Unified Industry Procurement Standard (Procurement Regulation) of Rosatom State Atomic Energy Corporation.

Collegiate Bodies - Conflict of Interest Committee and the Company Ethics Board.

Company - AKKUYU NUCLEAR JSC.

LPs - local regulatory acts.

RGD - Regulatory and guidance documents.

3. Subject Matter

3.1. Policy Objectives:

- to create an environment that prevents corruption or other offences;
- to promote among the Company employees and counterparties a consistent intolerance towards corruption in any form.

3.2. Policy Tasks:

- to define the Company employees and units responsible for prevention of corruption and other offences and to allocate anticorruption functions and responsibilities;
- to ensure coordination of the Responsible Employees' and Units' activities;
- to summarize and to explain the fundamental requirements of the anticorruption law of the Republic of Turkey and the Russian Federation that may be applied to the Company and Employees;
- to set forth the Company employees' responsibilities for awareness of and compliance with the principles and requirements hereof;
- to create an efficient practical mechanism for implementation of the corruption prevention and control activities stipulated by the anticorruption law of the Republic of Turkey, the Russian Federation, this Policy and other LPs and RGD regulating the Company's anticorruption activities;
- to mitigate the risk of having the Company and its employees, regardless of their position, involved in corrupt practices.

3.3. Policy Principles:

- compliance with the current law of the Republic of Turkey, the Russian Federation and agreed standards;
- observance of legitimate rights and interests, protection of the Company employees' and their partners' and counterparties' business reputation;
- top management's personal example of a culture of intolerance to corruption and creating an in-house system of corruption prevention and control;
- having the Company employees involved through informing them about the anticorruption laws of the Republic of Turkey and the Russian Federation and through their active participation in defining and implementing anticorruption standards and procedures;
- exercising transparency in business relationship with partners and counterparties by keeping them advised on the Company's anticorruption standards and procedures;
- achieving anticorruption procedures' proportionality to the risk of corruption, through development and implementation of a set of actions that reduce the chance of having the Company or its employees involved in corrupt practices;
- achieving efficiency of anticorruption procedures through special activities held to ensure easy implementation and tangible result;
- on-going control and regular monitoring of the efficiency of implemented anticorruption standards and procedures and their follow-up;
- liability and inevitability of penalty for such Company employees

who commit a corruption offence in connection with their employment duties, regardless of their position, service record and other circumstances;

- non-disclosure of commercial and trade secrets when holding anticorruption activities.

3.4. Policy scope and the range of persons to whom it applies:

3.4.1. The Policy is an integral part of the organizational and administrative documents and is binding upon all the Company employees, regardless of the position held and duties performed (subject to terms and conditions stipulated in p. 1.4 hereof).

3.4.2. The Policy applies to the Company's partners and counterparties, as well as other persons by virtue of accrued mutual obligations between them and (or) the Company.

3.4.3. The Policy is a public document that must be made freely accessible by all Company employees, business partners and counterparties.

3.5. Anticorruption activities that may be carried out by the Company include:

1) definition of the units and officials responsible for the corruption and other offence avoidance;

2) the Company's cooperation with the law-enforcement authorities of the Republic of Turkey and the Russian Federation;

3) development and implementation of standards and procedures to ensure that the Company acts in good faith;

4) adoption of a Code of ethics and workplace behavior of the Company employees;

5) prevention and settlement of conflicts of interest;

6) prevention of informal reporting and use of false documents.

4. Participants and Roles

4.1. Appointment of employees, units and Governance Bodies of the Company responsible for prevention of corruption and other offences and for the Policy implementation:

4.1.1. Company employees and units responsible for: corruption and other offences' prevention shall be appointed by a relevant Company order.

4.1.2. Company employees and units responsible for: corruption and other offences' prevention shall be designated and appointed by relevant Company orders (subject to

terms and conditions stipulated in p. 1.4 hereof).

4.1.3. Company employees and units responsible for the Policy implementation shall be appointed from among the Company employees and units responsible for preventing corruption and other offences.

4.1.4. The Company shall set up a Conflict of Interest Committee and an Ethics Board both made up of the Company employees. Organizational and administrative documents regulating the Collegiate Bodies' activity shall be developed on the basis of relevant LPs and RGD adopted by the Company and shall be approved and enforced by the Company's in-house LPs (subject to terms and conditions stipulated in p. 1.4 hereof).

4.1.5. Within their competence, the Collegiate Bodies created in the Company shall determine matters that concern the Company employees regardless of their position and duties.

4.1.6. Matters related to conflict of interest settlement or to compliance with the Code of Ethics and involving the Company's CEO shall be determined by the Company Board of Directors.

4.1.7. At the discretion of the Company CEO, based on materials submitted by Chairmen of the Company's Collegiate Bodies or by responsible Company employees, matters related to conflict of interest settlement or the Company Employees' compliance with the Code of Ethics may be referred to the Company Board of Directors.

4.2. Definition and assignment of the Company participants' roles and responsibilities (employee, business unit, governance body) related to the corruption prevention and control:

Chief Executive Officer of the Company – shall ensure adoption and implementation of anticorruption activities defined by the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy.

Responsible Employees (deputy CEOs) shall:

- ensure the adoption and implementation, by their respective units, of anticorruption activities defined by the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy, subject to the requirements of Rosatom LPs and RGD regulating anticorruption activities;
- ensure the appointment, in their respective units, of persons responsible for preventing corruption and other offences and ensure that personal functions and responsibilities for

prevention of corruption are assigned forthwith.

Responsible employees and units of the Company's Security Directorate shall:

- set up and run coordination of the Company's anticorruption activities;
- ensure that the Company acts in good faith in compliance with the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy insofar as it concerns the development, implementation and timely updating of the LPs and RGD regulating the anticorruption activities, within the area of their responsibility (competence);
- create an environment suitable for the Company employees' compliance with the conflict of interest prevention and settlement requirements when performing their duties, as set forth by the law of the Republic of Turkey, the Russian Federation and Company policies, within their area of responsibility (competence);
- arrange and carry out activities to identify and eliminate the causes and circumstances that give rise to conflicts of interests, within the area of their responsibility (competence);
- create a list of positions of the Company involving high corruption risk;
- carry out counterparty checks as to such entities' reputation in the business community, industry record, involvement in corruption scandals, etc.;
- ensure timely delivery to Rosatom of personal financial statements, disclosures on property owned and material obligations submitted by the Company employees included in the respective list (a task of the Company's Asset Protection Department);
- summarize and analyze the results of corruption risk assessment performed by Responsible Units in order to minimize corruption risks;
- accept and review reports on attempted employee solicitation to commit corruption offences in favor or on behalf of the Company, as well as actual corruption offences committed by the Company employees, counterparties and other persons;
- arrange interaction between the Company and the governmental and law-enforcement authorities of the Republic of Turkey and the Russian Federation regarding the matters of corruption prevention and control;
- arrange personal advice sessions for the Company employees on matters of corruption prevention and control;
- evaluate the results of anticorruption activities, prepare the required deliverables and develop proposals on the anticorruption activity improvement to be submitted to the Company management;

- participate in the development of rules regulating the matters of exchanging business gifts and entertainment by way of submitting relevant proposals to the departments of Human Resources Directorate and discussing draft rules;
- participate in Russian and international meetings, research and practice seminars and conferences dedicated to corruption prevention and control;
- participate in scheduled and unscheduled checks of compliance with the anticorruption law of the Republic of Turkey, the Russian Federation, this Policy requirements, as well as LPs and RGD regulating the Company's anticorruption activities, within their area of responsibility (competence).

Responsible employees and units of the Company's Human Resources Directorate shall:

- ensure that the Company acts in good faith in compliance with the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy insofar as it concerns the development, implementation and timely updating of the LPs and RGD regulating the anticorruption activities, within the area of their responsibility (competence);
- inform the Company employees, counterparties and partners about the Company's current standards and procedures that ensuring the Company's good faith operation;
- arrange training of the Company employees in the matters of anticorruption activities;
- ensure operation of the Company's Ethics Board and timely updating of the organizational and administrative documents regulating its activities, including compliance with the procedure of submission of personal financial statements, disclosures on property owned and material obligations submitted by the Company employees included in the respective list;
- create an environment suitable for the Company employees' compliance with the conflict of interest prevention and settlement requirements when performing their duties, as set forth by the law of the Republic of Turkey, the Russian Federation and other legal enactments, including by way of developing a Conflict of Interest Policy and a Regulation on the Conflict of Interest Committee, as well as the list of typical conflict of interest situations;
- arrange and carry out activities to identify and eliminate the causes and circumstances that give rise to conflicts of interests, within the area of their responsibility (competence);
- conduct internal investigations in the event there are grounds to believe a breach of the anticorruption law of the Republic of Turkey, the Russian Federation, the Policy, rules and regulations adopted by the Company, or standards and procedures ensuring that the Company acts in good faith has occurred.

- develop and approve rules regulating the matters of exchanging business gifts and entertainment;
- participate in compiling a list of the Company positions involving high corruption risk by way of submitting proposals to the units responsible for the anticorruption activity coordination;
- participate in corruption risk assessment, as per p. 5.1 hereof (within one's area of competence).

Responsible employees and units of the Company's Legal and Corporate Affairs Directorate shall:

- ensure that the Company acts in good faith in compliance with the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy insofar as it concerns the development, implementation and timely updating of the LPs and RGD regulating the anticorruption activities, within the area of their responsibility (competence);
- conduct monitoring of the Turkish, Russian and international anticorruption law to track any introduced changes and the relevant court practice;
- ensure timely informing of the Responsible employees and units of any changes of the law that concern the Company's anticorruption activities;
- create an environment suitable for the Company employees' compliance with the conflict of interest prevention and settlement requirements when performing their duties, as set forth by the law of the Republic of Turkey, the Russian Federation and other legal enactments, within their area of responsibility (competence);
- arrange and carry out activities to identify and eliminate the causes and circumstances that give rise to conflicts of interests, within the area of their responsibility (competence);
- develop and introduce a standard anticorruption clause into contract and agreement templates used by the Company and related to its financial and business operations;
- participate in corruption risk assessment, as per p. 5.1 hereof (within one's area of competence);
- participate in the development of rules regulating the matters of exchanging business gifts and entertainment by way of submitting relevant proposals to the departments of Human Resources Directorate and discussing draft rules;
- participate in scheduled and unscheduled checks of compliance with the anticorruption law of the Republic of Turkey, the Russian Federation, this Policy requirements, as well as LPs and RGD regulating the Company's anticorruption activities, within their area of responsibility (competence).

Responsible employees and Departments of the Company's Methodology, Procurement and Business Administration shall:

- ensure that the Company acts in good faith in compliance with the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy insofar as it concerns the development, implementation and timely updating of the LPs and RGD regulating the anticorruption activities, within the area of their responsibility (competence);

- create an environment suitable for the Company employees' compliance with the conflict of interest prevention and settlement requirements when performing their duties, as set forth by the law of the Republic of Turkey, the Russian Federation and other legal enactments, within their area of responsibility (competence);

- arrange and carry out activities to identify and eliminate the causes and circumstances that give rise to conflicts of interests, within the area of their responsibility (competence);

- participate in corruption risk assessment, as per p. 5.1 hereof (within one's area of competence);

- participate in the development of rules regulating the matters of exchanging business gifts and entertainment by way of submitting relevant proposals to the departments of Human Resources Directorate and discussing draft rules;

- participate in scheduled and unscheduled checks of compliance with the anticorruption law of the Republic of Turkey, the Russian Federation, this Policy requirements, as well as LPs and RGD regulating the Company's anticorruption activities, within their area of responsibility (competence).

Responsible employees and units of the Company's Economics and Finance Directorate shall:

- ensure that the Company acts in good faith in compliance with the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy insofar as it concerns the development, implementation and timely updating of the LPs and RGD regulating the anticorruption activities, within the area of their responsibility (competence);

- ensure prevention of informal financial (accounting) reporting by the Company employees and the use of false documents, within their area of responsibility (competence);

- participate in corruption risk assessment, as per p. 5.1 hereof (within one's area of competence);

- participate in the development of rules regulating the matters of exchanging business gifts and entertainment by way of submitting relevant proposals to the departments of Human Resources Directorate and discussing draft rules;

- participate in scheduled and unscheduled checks of compliance with the anticorruption law of the Republic of Turkey, the Russian Federation, this Policy requirements, as well as LPs and RGD regulating the Company's anticorruption activities, within their area of responsibility (competence).

Responsible employees and units of the Company's Construction Division shall:

- ensure that the Company acts in good faith in compliance with the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy insofar as it concerns the development, implementation and timely updating of the LPs and RGD regulating the anticorruption activities, within the area of their responsibility (competence);

- participate in corruption risk assessment, as per p. 5.1 hereof (within one's area of competence);

- participate in the development of rules regulating the matters of exchanging business gifts and entertainment by way of submitting relevant proposals to the departments of Human Resources Directorate and discussing draft rules;

- participate in scheduled and unscheduled checks of compliance with the anticorruption law of the Republic of Turkey, the Russian Federation, this Policy requirements, as well as LPs and RGD regulating the Company's anticorruption activities, within their area of responsibility (competence).

Responsible employees and units of the Company's Internal Control and Audit Directorate shall:

- ensure that the Company acts in good faith in compliance with the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy insofar as it concerns the development, implementation and timely updating of the LPs and RGD regulating the anticorruption activities, within the area of their responsibility (competence);

- create an environment suitable for the Company employees' compliance with the conflict of interest prevention and settlement requirements when performing their duties, as set forth by the law of the Republic of Turkey, the Russian Federation and other legal enactments, within their area of responsibility (competence);

- arrange and carry out activities to identify and eliminate the causes and circumstances that give rise to conflicts of interests, within the area of their responsibility (competence);

- exercise controls to prevent informal financial (accounting) reporting by the Company employees and the use of false documents, within their area of responsibility (competence);

- exercise controls and check

the economic advisability of transactions related to business gifts exchange, hospitality expenses, charitable donations, external consultants' fee and other areas involving high corruption risk;

- arrange interaction between the Company and law-enforcement authorities regarding corruption prevention and control, within their area of responsibility (competence);

- participate in corruption risk assessment, as per p. 5.1 hereof (within one's area of competence).

The Company's Conflict of Interest Committee shall:

- determine matters related to conflicts of interests in the Company;
- set up procedures for submission and review of conflict of interest declarations.

The Company's Ethics Board shall consider the issues related to compliance with the rules and regulations set forth by the Company's Code of Ethics.

Company employees not appointed by relevant LPs as Responsible Employees shall:

- ensure that the Company acts in good faith in compliance with the anticorruption law of the Republic of Turkey, the Russian Federation and the Policy insofar as it concerns the development, implementation and timely updating of the LPs and RGD regulating the anticorruption activities;

- refrain from committing and (or) participating in corruption offences in favor or on behalf of the Company, as well as from behavior that may be interpreted by other people as one's readiness to commit or participate in a corruption offence in favor or on behalf of the Company;

- immediately inform one's direct supervisor and the anticorruption activity coordinator about any attempted employee solicitation to commit a corruption offence about actual corruption offences committed by other Company employees, counterparties or other persons and about any potential pre-conflict situation or arising conflict of interest.

5. Anticorruption Activities, standards and procedures and the order of their implementation (application).

5.1. Corruption Risk Assessment:

5.1.1. Corruption risks shall be assessed in order to define specific business processes and operations within the Company's activity, which imply high probability of a corruption offence committed by an employee, whether for their personal benefit or that of the Company.

5.1.2. Corruption risk assessment shall be performed both at the stage of the Policy development and regularly after its approval.

5.1.3. Corruption risk assessment procedure shall follow this pattern:

- presentation of the Company's activities as separate business processes;
- highlighting critical points, i.e. for each business process the elements (sub-processes) shall be defined, which implies the highest probability of corruption or another offence;
- description of potential corruption offences, including:
 - the nature of benefit or advantage that may be gained by the Company or any of its employees upon committing a corruption offence;
 - "key" positions in the Company that are instrumental for committing corruption offences; a list of the company officials whose participation is crucial for committing a corruption offence;
 - possible forms of corruption benefits;
- preparation of the Company's "corruption risk map" (a summary of critical points and possible corruption offences);
- creating a list of positions involving high corruption risk;
- establishment of special anticorruption procedures and requirements including regular submission of conflict of interest declarations;
- development of a set of actions seeking to eliminate and to mitigate corruption risks.

5.2. Conflict of interest prevention and settlement:

5.2.1. A Conflict of Interest Regulation shall be developed and enforced by Responsible employees of the Company in order to prevent and manage conflict of interest in the Company employees' activities. The standards and principles set forth by the Company's Code of Ethics should be taken into account.

5.2.2. The Conflict of Interest Regulation covers all Company employees, including the individuals who cooperate with the Company under short-term contracts.

5.2.3. Principles of conflict of interest management:

- mandatory disclosure of information on real and potential conflict of interest;
- individual consideration and assessment of reputation risks for the Company when each conflict of interest is recognized and settled;
- confidentiality of any disclosed information about a conflict of interest and confidentiality of the settlement procedure;
- balance between the Company's and the Employee's interests at conflict settlement;
- non-retaliation policy in respect of an Employee who reports a conflict of interest that was timely disclosed by such Employee and settled (prevented) by the Company.

5.2.4. Responsibilities of the Company Employees related to conflict of interest disclosure and settlement:

- be guided by the Company's interests regardless of one's personal interests or the interests of one's relatives and friends when taking business decisions and performing one's job duties;
- avoid (when possible) the situations and circumstances that may entail a conflict of interest;
- disclose any emerging (real) or potential conflict of interest;
- encourage the settlement of an emerging conflict of interest.

5.2.5. For the purpose of the Company Employees' compliance with their conflict of interest prevention and settlement obligations pursuant to the law of the Republic of Turkey and the Russian Federation and for the purpose of implementation of corruption prevention activities, the Company shall set up a Conflict of Interest Committee, appoint its members and enforce a relevant Statute on Conflict of Interest Committee.

5.2.6. The Company may take the following actions in order to prevent and settle conflicts of interests:

- develop and adopt in-house documents stating the procedure of prevention and settlement of conflict of interest or pre-conflict situations faced by the Company Employees while performing their job duties;
- inform all Company Employees about the adoption of the said documents and the bindingness of requirements contained therein;
- set several time points for conflict of interest disclosure: at commencement of employment, at appointment to a new position, as a conflict of interest arises, etc.;
- ensure obligatory filing of conflict of interest declarations by a predefined range of persons (the range of Employees is defined by Conflict of Interest Committee Chairman based on reasons to suspect a conflict of interests and

the need to examine the existing suspicions);

- designate Employees and units responsible for acceptance of information about emerging conflicts of interest;
- ban the execution of any contracts with persons found to have been involved in a conflict of interest, an affiliation, an interested party transaction or other abuses;
- define typical conflict of interest situations;
- ensure operation of the Company's Collegiate Bodies;
- establish the ways of conflict of interest resolution to be used by the Company management and the Employees affected by conflict of interest prevention and settlement procedures;
 - restrict the Employees' access to specific information which may concern their personal interests;
 - ensure an Employee's voluntary abandonment or ban (permanent or temporary) from participating in the discussion and decision-making process regarding issues that are or may be affected by conflict of interest;
 - review and modify the Employee's functional duties;
 - suspend an Employee from office if his/her personal interests contradict his/her functional duties;
 - transfer an Employee to a position in which their functional duties are unrelated to a conflict of interest;
 - an Employee's waiver of his/her personal interests that clash with the Company's interests;
 - an Employee's voluntary resignation;
 - an employer-initiated termination for committing a disciplinary offence, i.e. for the Employee's non-fulfillment or improper fulfillment of their assigned job duties through their fault.

5.2.7. The Company shall maintain confidentiality both in respect of individual Employees and in respect of submitted information when handling conflict of interest issues.

5.3. Development and implementation of standards and procedures to ensure that the Company acts in good faith.

The Company shall ensure introduction of anticorruption standards of Employee behavior into the Company's corporate culture, and to that end the Company shall:

5.3.1. Develop and adopt Code of Ethics and Code of Corporate Behavior of the Company Employees, which define:

- the Company's common values and principles;
- specific rules and standards of the employees' behavior related to common ethics of business relations and intended to foster an ethical and honest behavior.

5.3.2. In order to carry out ongoing conflict of interest monitoring and uncover the instances of affiliation, interested party transactions and other abuses, ensure collection and proper timely delivery to Rosatom of personal financial statements, disclosures on property owned and material obligations submitted by the Company employees at certain positions and individuals seeking appointment to Company posts, which include similar data on their spouses and minor children.

5.3.3. Be guided by principles of honesty and objectivity when appointing candidates to positions (including senior staff):

- employees shall be appointed and promoted solely on the basis of their business qualities;
- a ban shall be imposed on hiring relatives if their positions involve direct subordination of one to another;
- Employees must submit information stated in p. 5.3.2. hereof.

5.3.4. Consider exchanging gifts with business partners an integral part of business ethics if such actions are transparent and meet the provisions of law of the Republic of Turkey, the Russian Federation and the Company's LPs.

5.3.5. Require that the Company Employees report to their direct supervisor and the anticorruption activity coordinator if they accept any gift whose value exceeds a strict limit set by the anticorruption law of the Republic of Turkey and the Russian Federation in connection with their official position or performance of their employment (job) duties.

5.3.6. Be involved in charitable activity or sponsorship independently or via its Employees basing on the principle of transparency without pursuing the aim of getting or maintaining an advantage in the Company's business.

5.3.7. Take action to combat unlawful use of insider information and market rigging in the Company.

5.4. Investigation and Processing of Corruption Allegations:

5.4.1. The Company shall involve its concerned units in arranging investigations of allegations received through Rosatom specialized hot line communication channels and investigations of reports about corruption and other

offences. The findings of such inquiries shall be forwarded to Rosatom Asset Protection Department.

5.4.2. According to the procedure stipulated by the law of the Republic of Turkey and the Russian Federation, the Company accepts and reviews corruption allegations submitted by employees, partners, counterparties and other persons (individuals or legal entities) to the Company management and Responsible Employees by post, e-mail and personally.

5.4.3. The Company shall endeavor to set up an efficient system of examining corruption allegations and, if found true, the Company shall endeavor to mitigate (minimize) the consequences and the causes of such actions, also by way of forwarding materials to law-enforcement authorities of the Republic of Turkey and the Russian Federation (when appropriate).

5.5. Employee advising and training.

The Company shall exercise various forms of employee training on matters of corruption avoidance and control:

5.5.1. The Company shall hold educational activities (briefings, courses at educational institutions, workshops, conferences, training sessions, polling and testing of Employees, etc.) and shall explain:

- the notion of corruption in the state and private sectors;
- liability for committing corruption offences;
- requirements of the anticorruption law of the Republic of Turkey, the Russian Federation, the Policy, the Company's LPs and RGD on corruption prevention and control and the procedure of their implementation;
- procedure of identification and settlement of conflicts of interests arising in connection with one's job duties;
- behavior in situations involving risk of corruption, notably, in the event a public or municipal officer of the Republic of Turkey or the Russian Federation insists on a bribe;
- procedure of interaction with law-enforcement authorities of the Republic of Turkey and the Russian Federation on matters of corruption prevention and control;

5.5.2. The Company shall offer individual and confidential advice to employees on matters of corruption prevention and control.

5.6. Fostering law-abiding behavior among the Employees:

5.6.1. As part of its anticorruption activities, the Company shall hold awareness events for Company Employees by way of:

- starting and updating an "Anticorruption Activity"

section on the Company's official website;

- posting information about events related to the implementation of this Policy in open corporate media;
- arranging anticorruption events and campaigns;
- rewarding Employees for reporting corruption and other offences actually committed at the Company;
- offering a guarantee of no career-related or financial consequences for Employees who give up corrupt practices even if such abandonment entails extra costs for the Company;
- declaring the necessity of developing the procedure of taking corporate action against persons involved in corruption and other offences.

5.6.2. The Company Employees' compliance with the principles and requirements hereof shall be taken into account when considering promotion.

5.7. Internal control and audit:

5.7.1. The system of internal control and audit shall carry out the following tasks related to corruption prevention and detection:

- ensure reliability and accuracy of the Company's financial (accounting) statements;
- ensure that the Company complies with the requirements of the anticorruption law of the Republic of Turkey, the Russian Federation, the Policy and the Company's LPs.

5.7.2. As part of control activities, the Company shall monitor the following:

- compliance with various organizational procedures and guidelines that bear significance in terms of prevention and combating corruption;
- control over the Company's transaction documenting insofar as it concerns prevention of the following actions: preparation of informal reporting, use of false documents, recording bogus expenses, lack of source documents, alterations made in documents and statements, destruction of documents and statements before the expiration of set terms, etc.;
- checkup of economic feasibility of transactions made in the areas involving corruption risk, such as business gift exchange, hospitality expenses, charitable donations, external consultants' fees and other areas.

5.7.3. The Company shall engage independent external auditors and require them to report any signs of corruption identified in the course of audits.

5.7.4. The Company shall carry out activities to prevent money laundering; these shall include the following:

- identifying instances of acquisition, possession or use of property if such property is known to be proceeds of crime;
- identifying instances of concealing or covering-up any property's true nature, source, location, mode of control, transfer of title or ownership if such property is known to be proceeds of crime.

5.8. Business courtesies and gifts giving/receiving procedure:

5.8.1. Business courtesies must not contravene the ethical principles of the Company's activity set forth by the Company's Code of Ethics.

5.8.2. Business courtesies must be accorded in strict compliance with the budget for such expenses and shall be subject to control pursuant to the Company's budget control procedures.

5.8.3. When according Business Courtesies, the Employees cannot:

- give any cash or its equivalent as a gift (gift certificates, loans, shares and share options, etc.) regardless of their value;
- hold any entertainment events unless other Company employees are present and/or participate therein;
- accord Business Courtesies to family members of an Employee, a counterparty, a partner or other person, except such special events in which participation of a spouse is a business custom.

5.8.4. Company Employees are prohibited to accord business courtesies to public officers of the Republic of Turkey and the Russian Federation, except gifts of Company merchandise.

5.8.5. Company Employees are prohibited to accord business courtesies to third parties on behalf of the Company's actual or potential counterparties or other business partners.

5.8.6. The procedure for using funds held on Corporate Representation Cards (hereinafter CRC) and for reporting such expenses, the rights and responsibilities of CRC holders shall be defined by the Company's CRC rules.

5.8.7. If necessary, the Company may provide exit visa procurement, hotel booking, transfer, airplane and railway tickets, medical insurance etc. for its business partners for a fee, i.e. against a complete subsequent compensation by business partners of the expenses incurred by the Company.

The above mentioned actions shall be performed by the Company only:

- if the Company's business partner submits a letter of guarantee

and the company CEO personally accepts and approves it;

- if such business partner is not in arrears on any payment due to the Company.

5.8.8. It is forbidden to arrange exit visa procurement, hotel booking, transfer, airplane or railway tickets, medical insurance and etc. for the Company's business partners on a free-of-charge basis (without a complete subsequent compensation by business partners of the expenses incurred by the Company).

5.8.9. Accounting for the Company merchandise distributed as gifts and for hospitality expenses provided by the Company must be performed in accordance with the Company's LPs.

5.8.10. Gifts given by the Employees to other persons and companies on behalf of the Company and gifts received by the Employees from other persons and companies in connection with their job duties, as well as hospitality expenses including entertainment expenses and Company promotion incurred by the Company Employees from time to time, must match the following criteria:

- they must be directly related to the legitimate objectives of the Company's activity, for example, to a presentation, a business project completion or a national holiday (New Year, International Women's Day, Armed Forces Day, commemoration dates, anniversaries, etc.);

- they must be reasonable, well-proportioned and cannot constitute luxury goods. Acceptable gift value is strictly limited by the anticorruption law of the Republic of Turkey and the Russian Federation;

- such expenses must be approved by an authorized Company manager;

- they cannot constitute a hidden compensation for a service, action (omission), connivance, patronage, granting of rights, taking a predefined decision on a transaction, agreement, permit, etc. or an attempt to influence the receiver for other illegal or unethical purposes;

- they must not create a reputation risk for the Company, the Employees and other persons in the event the information on such gifts and hospitality expenses is disclosed;

- they must not conflict with the principles and requirements of the Policy, Code of Ethics, other LPs and RGD of the Company relating to corruption prevention and control.

5.8.11. Gifts in the form of Company merchandise (low cost) bearing the Company symbols that are distributed at open presentations, forums, congresses and other entertainment and official events shall be permissible and shall be deemed image-building costs.

5.8.12. No cash gift, whether physical cash or otherwise, may be given to anyone on behalf of the Company, its Employees and representatives,

regardless of the currency type.

5.9. Anticorruption Precautions when Interacting with Partners and Counterparties.

5.9.1. The Company endeavors to establish and maintain business relations with its partners and counterparties who:

- follow the Policy principles and requirements;
- maintain fair and honest business relations;
- take care of their own business reputation;
- demonstrate support of high ethical standards;
- implement their own anticorruption activities;
- participate in collective anticorruption initiatives.

5.9.2. In its procurement and contractual activities with the counterparties the Company shall pursue solely the Company's own benefit and shall act in strict adherence to the Standard, other LPs and RGD regulating procurement and contractual activities. Moreover, the Company Employees must prevent corruption or other offences.

5.9.3. Company Employees who are members of the Executive Committee, Tendering Committee and other governance bodies that determine the Company's financial and physical resource allocation must be unprejudiced in their decisions, must pursue solely the Company's benefit, prevent corruption and other offences and comply with the requirements of Regulations on relevant governance bodies' operation.

5.9.4. The Company shall inform its partners and counterparties about the Policy requirements, standards of behavior, rules and procedures intended to implement corruption control and prevention.

5.9.5. To mitigate the risk of the Company involvement in corrupt and other unfair practices, the Company shall implement special procedures of checking potential counterparties for reliability, business reputation, market record, involvement in corruption scandals, etc.

5.9.6. When concluding a contract with Bidders, the latter are required to provide complete and reliable information relating to the entire chain of owners and beneficiaries (including ultimate beneficiaries).

5.9.7. The Company shall provide no benefits whatsoever to its counterparties' employees, whether in the form of cash or gifts, free services (works) or otherwise, and shall not make such counterparty's employees indebted or bound to perform certain actions in the Company's favor.

5.10. Interaction with the supervising government bodies:

The Company shall:

5.10.1. Require the Company Employees to refrain from making any offers that may cause a conflict of interests to arise for such public official.

5.10.2. Implement activities to prevent the Company from being held administratively liable, and thus the Company shall ban:

- any handover, offer or promise made on behalf and to the benefit of the Company to a public officer or civil employee in respect of any cash, securities, other property, valuable services or property interests for the performance of an action (omission) in connection with such employee's position;

- any offers and attempts to give public and civil inspectors any gifts whose value exceeds a strict limit set by the anticorruption law of the Republic of Turkey and the Russian Federation.

5.10.3. Establish the procedure of reporting to law-enforcement authorities any facts of violation of the code or public officers' and civil employees' behavior when performing their supervisory functions in the Company and establish a procedure of pre-court appeal against such persons' actions.

5.10.4. Not provide financial or other assistance to political parties (organizations) nor take part in the sponsorship of anyone's election campaigns, since such assistance may be deemed an attempt to obtain an illegal market advantage for the Company.

5.10.5. The Company Employees may exercise their personal rights to participate in political movements in compliance with the law of the Republic of Turkey and the Russian Federation, including making cash contributions to political parties at their option. However, the Employees must:

- ensure that they use their own time and resources for the above purposes;
- make sure that such actions do not conflict with their functional duties at the Company.

5.10.6. The Company's charity activities are based solely upon Rosatom's common industry charity programs.

5.10.7. Any out-of-plan charitable activities of the Company and any charitable donations made to non-profit institutions may take place solely by resolution of a Company's governance body defined according to the Company's LPs.

5.11. Cooperation with the law-enforcement authorities in the area of corruption control:

5.11.1. The Company assumes a public obligation to:

- report to the law-enforcement authorities about any instances of corruption and other offences that become known to the Company, if there are reasons to believe that such offenses have actually taken place;

- refrain from any retaliation to its Employees who report to the law-enforcement authorities about a planned or actually perpetrated corruption or other offence they came to know about in the course of performing their employment (job) duties;

- prevent the Company Employees' unlawful interference with law-enforcement authorities' activities when carrying out anticorruption activities.

5.11.2. The Company shall provide support to law-enforcement authorities in identification and investigation of corruption allegations and shall take adequate action to preserve and to deliver to the law-enforcement authorities documents and information containing evidence of corruption; the Company shall maintain cooperation with the law-enforcement authorities by rendering assistance to authorized representatives of the said authorities:

- during the audits of the Company's activities in the area of corruption prevention and control;

- during the activities on controlling or investigating corruption offences, including police operations.

5.12. Participation in collective corruption prevention and control initiatives:

5.12.1. In addition to implementing the Company's own anticorruption activities, the Company shall take part in collective anticorruption initiatives.

5.12.2. The Company shall take part in:

- the use of standard Anticorruption Clauses in joint contracts;
- public ban of any cooperation with companies involved in corruption offences;

- arranging joint trainings in the matters of corruption prevention and control;

- the Company experts' involvement in international and other anticorruption events.

6. Liability

6.1. Liability for corruption and other

offences in the Company shall include: disciplinary, civil, administrative action and criminal prosecution taken (carried out) in accordance with the law of the Republic of Turkey and Russian Federation, as well as corporate action as per the Company's LPs.

6.2. To the extent permitted under the law of the Republic of Turkey and the Russian Federation, the Company shall examine any reasonable allegation or established fact of corruption.

7. Regulatory References

Laws of the Republic of Turkey, the Russian Federation, Rosatom State Corporation's and the Company's local policies.

8. Amendment Procedure

8.1. The Company's Economic Security Department shall be in charge of updating this Policy.

8.2. If updates are not initiated by the Company's Economic Security Department, the initiator of such amendments must submit a rationale for such amendments to the Economic Security Department.

8.3. Amendments may be introduced into this Policy by resolution of the Company's anticorruption activity coordinator (Deputy CEO for Security) as advised by the Economic Security Department.

8.4. Upon assessment of their practicability, amendments of this Policy shall undergo the procedure of approval as per the Company's policies.

9. Follow-up Responsibility

9.1. Policy compliance control.

All employees involved in the process groups described herein shall be held disciplinary liable for any breach of the requirements hereof.

Follow-up of the Policy shall be carried out by the Company's anticorruption activity coordinator (Deputy CEO for Security).

9.2. Employees' liability.

Disciplinary action shall be taken by the Company in accordance with the law of the Republic of Turkey, the Russian Federation, Rosatom State Corporation's and the Company's local policies.