

ORDER

Ankara

14 April 2016

No. 24

On approval of the Procedure of AKKUYU NUCLEAR JOINT STOCK COMPANY employees reporting to the employer about attempted solicitation to commit corruption offenses, arrangements to file and to investigate such reports

In accordance with the Order of the State Corporation “Rosatom” dated 18.10.2013 No. 1/8-НПА

IT IS HEREBY ORDERED:

1. The Procedure of AKKUYU NUCLEAR JOINT STOCK COMPANY employees reporting to the employer about attempted solicitation to commit corruption offenses, arrangements to file and to investigate such reports (Appendix 1) shall be approved;
2. Human Resources Directorate shall bring this Procedure to the attention of heads of structural units and Company employees against signature;
3. Deputy CEO for Safety and Compliance Mr. A.K. Antropov shall be assigned to follow up this Order.

Acting CEO

/signature/

O.V. Titov

A.K. Antropov
Tel. 31-86

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Procedure
of AKKUYU NUCLEAR JOINT STOCK COMPANY
employees reporting to the employer about attempted solicitation to commit
corruption offenses, arrangements to file and to investigate such reports

1. General Provisions

1.1. This Procedure establishes the manner and the timeframe for AKKUYU NUCLEAR JOINT STOCK COMPANY (hereinafter - Company) employees to report to the employer about solicitation to commit corruption offenses (hereinafter - Reports), the data to be provided in a Report, and the process of filing the Reports.

1.2. Company employees must notify the employer, pursuant to the Procedure, about solicitations attempted by any persons in order to induce them to commit corruption offenses (hereinafter - Solicitations).

Company employees may notify public authorities about such Solicitation in which case they must mention this in the relevant Report addressed to the employer.

1.3. Company Employees who become aware of an actual Solicitation attempt made towards other employees in connection with performance of their official duties in order to induce them to commit corruption offenses may notify the employer about this in accordance with the Procedure.

1.4. Reporting facts of Solicitation to the Company is a duty of each Company employee; failure to follow it shall entail disciplinary action.

II. Reporting to the Employer

2.1. Once a Company employee faces a Solicitation to commit a corruption offense, he/she must immediately (not later than the day following the day of Solicitation) or, if the said Solicitation is made outside the working hours and/or outside the workplace, not later than one working day upon arrival to the workplace, submit a written Report to the Company Directorate of Human Resources in duplicate; the said Report is to be made in a free form or according to the recommended template provided in Appendix 1 hereto.

The Report is to be marked "trade secret", "for official use" if its contents do so require.

2.2. The Report is to be submitted by the Company employee personally or, if it contains no limited access information, it is to be sent by post with acknowledgment of receipt.

III. List of Data to be included in the Report

3.1. The Company employee must specify in the Report their surname, initials, position and contact phone numbers. The Report is to be personally signed by the Company employee and contain the date thereof.

3.2. The Report is to specify all known details about the soliciting entity, the nature of the proposed offense for which the Company employee was solicited, the manner in which the Company employee was solicited (bribery, blackmail, threats, etc.), time, date, venue and other details pertaining to the Solicitation attempt.

3.3. All available materials to confirm the details of such Solicitation attempt are to be enclosed with the Report.

IV. Report filing

4.1. On the day of Report submission, an authorized representative of the Employer shall file the incoming Report and, if necessary, shall follow the requirements of confidentiality and security of data received from the Company employee who faced a solicitation attempt; pursuant to the law of the host country, the said representative shall be held liable for disclosure of such data.

No incoming Report may be denied filing.

4.2. Incoming Reports are to be registered on the day of their submission in the Logbook of AKKUYU NUCLEAR JOINT STOCK COMPANY Employee Reports about Solicitation attempts to commit corruption offenses (hereinafter – the Logbook) (Appendix 2 hereto), which shall be kept by such authorized representative securely protected against unauthorized access.

The Logbook:

shall be part of the Company's system of records; the Logbook's pages are to be numbered, bound and sealed with the Company's corporate seal;

shall be kept safe (together with copies of Notices submitted at the Employer's discretion to the public prosecution offices of the Russian Federation and (or) other competent public authorities, and with the documents referred to in Clause 3.3 hereof) by such authorized representative for 5 years following the date on which the last Report was registered therein, and shall be thereafter moved to the records archive.

4.3. The Logbook shall include the following information:

registration number assigned to the Report;

date and time of its submission;

surname, name, patronymic of the person who signed the Report;

summary of the facts described in the Report;

number of sheets in the Report;

information about the Report submission to the employer, to public prosecution authorities and other competent public authorities;

surname, name, patronymic and signature of the authorized representative who received the Report.

4.4. Within three working days upon the Report registration, such Report shall be submitted by the authorized representative to the Company CEO or to a person nominated by the CEO who shall determine the arrangements for verification of the information provided in the Report, including the appointment of a person responsible for carrying out an investigation with regard to the Company's respective structural unit or employee.

The second copy of the Report shall contain its registration number, date and signature of the Employer's authorized representative and shall be delivered to the Company employee against a signature made in the Logbook or shall be sent to such Company employee by post with acknowledgement of receipt.

The Report copy handed over to the Company employee shall be marked "Report filed" and contain the date of the Report filing, the surname, name, patronymic and position of the authorized representative who filed this Report.

V. Arrangements to investigate Reports and taking appropriate action

5.1. Investigation of a Company employee's Report begins with finding out whether the employee has submitted a Notice to competent public authorities.

5.2. The main areas to be covered when investigating a Report are:

verification whether the action (omission) to which the Company employee was solicited may be deemed a corruption offense;

establishing the facts related to Solicitation of the Company employee to commit corruption offenses and the identities of all persons involved in such Solicitation attempt.

5.3. Interviews with the Company employees are to be held in order to verify the information provided in the Report, whether it concerns a Solicitation attempt made towards the reporting employee in connection with performance of their official duties in order to induce them to commit corruption offenses or a Solicitation attempt known to have been made towards any other Company employees in order to induce them to commit corruption offenses.

5.4. Within 7 days from the date of Report filing, the Company CEO or an officer nominated by the CEO shall forward the internal investigation findings to the competent public authorities; if the Company does not possess adequate evidence to consider unlawful the actions of persons that approached the Company employee in connection with performance of their official duties in order to solicit them to commit corruption offenses, the CEO/officer shall terminate the investigation.

5.5. The original Report with copies of investigation materials and interviews regarding the facts described in the Report and a copy of the cover letter submitted to the competent public authorities shall be kept safe in accordance with the requirements set forth in Clause 4.2 hereof.

5.6. On the day on which internal investigation materials are sent to competent public authorities or the investigation is terminated, the reporting employee shall be notified about the outcome of the matter.

Appendix 1

To Procedure of AKKUYU NUCLEAR JOINT STOCK COMPANY employees reporting to the employer about attempted solicitation to commit corruption offenses, arrangements to file and to investigate such reports

Recommended Report Template

*To the attention of
the Company CEO*

from _____
(surname, name, patronymic)

(surname, name, patronymic of employee of
the Company, position, telephone no.)

**Report
about an actually attempted Solicitation to commit corruption offenses**

I hereby report that:

- 1). _____
(description of circumstances under which the Solicitation was made by any persons
towards the Company employee in connection with performance of his/her official duties
in order to induce him/her to commit corruption offenses)

(date, place, time and other details)
- 2). _____
(details of the corruption offenses, which would have been committed
by the Company employee at the request of the person who attempted to Solicit them)
- 3). _____
(all known details about the individual (legal entity)
that attempted the Solicitation)
- 4). _____
(manner and details of the solicitation attempt (bribery, threat, deception, etc.),
and statement whether the soliciting entity's proposal was accepted or rejected)

(date, signature, initials and surname)

This Report has been entered into the Logbook of Employee Reports about Solicitation attempts to commit corruption offenses

(surname, name, position of the authorized representative that
filed the Report)

Filing entry: no. _____ dated _____, 20__

Appendix 2

To Procedure of AKKUYU NUCLEAR JOINT STOCK COMPANY employees reporting to the employer about attempted solicitation to commit corruption offenses, arrangements to file and to investigate such reports

Logbook
of Employee Reports about Solicitation attempts to commit corruption offenses

Started on _____, 20__
Completed on _____, 20__

Contains _____ sheets

Seq. No.	Filing entry number	Date of Report filing	Full name, position of the employee who submitted the Report	Summary of the Report	Information the investigation findings	Information about action taken	Full name of the person who filed the Report	Signature of the employee who submitted the Report