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by the order of the Director General of the State Enterprise Ignalina Nuclear Power Plant, No. IsTa-244 of 22 October 2021

CODE OF ETHICS FOR THE SUPPLIERS OF THE STATE ENTERPRISE IGNALINA NUCLEAR POWER PLANT

CHAPTER I GENERAL PROVISIONS

- 1. The mission of the State Enterprise Ignalina Nuclear Power Plant (hereinafter SE INPP or the Enterprise) is to implement a unique project safely and efficiently the decommissioning of the Ignalina Nuclear Power Plant, with its two RBMK-1500 reactors, and to safely manage the radioactive waste ensuring that future generations do not inherit the unreasonable burden of the radioactive waste management.
- 2. In implementing this unique project, the SE INPP seeks to comply with the higher than minimum requirements set out by legal acts and sets high ethical, environmental, and social responsibility requirements for itself. These requirements and the principles of their compliance are detailed in the SE INPP policies published on the Enterprise's website.
- 3. The activities of the SE INPP are financed to a large extent by the financial instruments of the European Union and the Republic of Lithuania, therefore, the Enterprise, when managing the supply chain, follows the provisions of the Law on Public Procurement of the Republic of Lithuania (hereinafter LPP) and the practice of the application of the LPP formed by the courts. The SE INPP is a purchasing organization.
- 4. The Code of Ethics for the Suppliers of the State Enterprise Ignalina Nuclear Power Plant (hereinafter Code of Ethics for the Suppliers) sets out the basic principles of the Enterprise's supply chain management and the provisions of the Suppliers' behaviour, which create preconditions for sustainable, fair, and good business ethics-based cooperation with the Suppliers and Sub-suppliers of goods, services and works (hereinafter the Suppliers). The SE INPP expects the Suppliers to comply with this Code of Ethics for the Suppliers throughout the entire period of cooperation with the Enterprise, regardless of the forms of cooperation.
- 5. The SE INPP is guided in its activities by the following core values **safety culture, transparency of activities, efficiency, professionalism,** and **social responsibility**. The Enterprise expects compliance with the same values from its Suppliers.

6. The SE INPP communicates with all market participants, existing and potential suppliers following the main procurement principles listed in the LPP – equality, non-discrimination, mutual recognition, proportionality, and transparency.

CHAPTER II PRINCIPLES OF SUPPLY CHAIN MANAGEMENT

7. By setting ambitious goals for itself, the SE INPP seeks to cooperate with Suppliers who are constantly improving their activities and seeking to meet the growing expectations of the market, as well as encourages them to implement and improve responsible business practices in line with the values promoted by the Enterprise. The SE INPP is determined to cooperate with Suppliers who understand and support the Enterprise's approach and seek to improve good practices in the following areas of activity:

7.1. Safety Culture.

The Suppliers are expected to pay particular attention to the qualification and full involvement of themselves and their employees in the implementation of contracts of any scope or purpose. When performing the contracts, the Suppliers shall strictly observe not only the provisions of the contract, but also the rules and standards approved by the Enterprise and the State Nuclear Power Safety Inspectorate (VATESI), which ensure safety not only at the object of the contract, but also safety at the Enterprise, as well as health and safety of the Enterprise's employees and the Suppliers' employees.

7.2. Transparency of activities.

The Suppliers shall have in place and maintain internal quality control systems, continuously monitor the requirements set out by the LPP relating to the absence of grounds for exclusion of participants and publish complete and correct information on their activities and significant changes related to their activities in a timely manner. The Suppliers shall be committed to publicly and fully declare all information related to the performance of contracts to the extent required by the applicable legal acts.

7.3. Efficiency.

The SE INPP expects the Suppliers to behave responsibly with the own and received funds, to constantly seek a rational balance of costs and to look for new ways to increase the efficiency of activities. The Suppliers shall carry out transparent and fair payments to their Suppliers and Sub-suppliers of goods or services. The Suppliers participating in public procurement procedures shall calculate the tender price responsibly, considering not only the minimum contract performance costs, but also promoting responsible social policy towards their employees.

7.4. Professionalism.

The Suppliers shall seek to attract and retain highly qualified personnel who, through their accumulated knowledge and experience, contribute to high performance in the implementation of contracts. All obstacles to the performance of contracts shall be resolved in a professional manner and without delay, in accordance with the law and contractual provisions. Problems shall be resolved by the principle of ethical cooperation with the SE INPP.

7.5. Social responsibility.

The Suppliers, in carrying out their activities and contractual obligations, anticipate possible negative consequences for the natural and social environment, actively participate in social dialogue with employees and other interested parties. They develop or use green energy and are focused on ecology and environmental protection. The Suppliers are familiar with and pursue the objectives of harmonized public procurement.

8. The principles of the supply chain management are understood as minimum standards, compliance with which, and ideally exceeding of which, the Enterprise expects from all Suppliers involved in the supply chain of SE INPP.

CHAPTER III GENERAL EXPECTATIONS FOR THE SUPPLIERS

9. **Respect for human rights.**

The Suppliers respect and protect the human rights and freedoms enshrined in the Universal Declaration of Human Rights and the United Nations Global Agreement. In carrying out their activities, the Suppliers do not tolerate any form of discrimination based on age, gender, race, nationality, citizenship, ethnicity, language, origin, social status, religion, beliefs or opinions, sexual orientation, disability, health status, family or marital status, membership in a political party or association and other grounds. The Suppliers do not tolerate any form of humiliation, violence, harassment and bullying in their own activities or their partners' activities and protect individuals who have reported cases from possible negative consequences.

10. Equal opportunities.

The Suppliers promote diversity and equality of employees. Seeks equal pay for the same work, considering only the professional and subject qualities of the employees. When hiring persons or terminating employment contracts with them, the competencies, experience and other professional rather than personal characteristics (gender, age, etc.) of the employees are considered. The Suppliers undertake to implement systems, policies and/or measures to guarantee equal opportunities in their activities. The Suppliers respect the family obligations of employees, the right to have free time for the care of children, disabled persons, or other persons, and provide, as far as possible, flexible opportunities for the performance of work.

11. **Data protection.**

The Suppliers respect the privacy of individuals and collect, process personal data in strict compliance with applicable legal regulations. Cases or incidents of personal data breaches are always immediately reported to the State Data Protection Inspectorate and the potentially affected persons. The Suppliers always inform the SE INPP about personal data breaches related to its employees.

12. Compliance.

The Suppliers comply with the requirements of applicable legal acts and have in place effective systems, policies and/or measures for the compliance ensuring. In developing its activities, the Suppliers adhere to the highest standards of environmental protection, governance, work, and ethics. The Suppliers undertake to foster a culture of honesty, transparency, openness, and compliance within organisations. They inform the interested parties in a timely and appropriate manner about their activities and effects of these activities.

13. Corruption prevention.

The Suppliers have clear corruption prevention systems and/or policies in place and apply effective measures to prevent and combat all forms of corruption. The Suppliers do not tolerate bribery, kickbacks, abuse of duties, money laundering, trade-in influence, etc. They avoid any conflicts of interest in their activities, do not seek to gain prohibited competitive advantage, conclude cartel agreements, restrict competition, coordinate tender proposals, and do not participate in any activity prohibited by law. The Suppliers do not provide or seek to receive gifts, hospitality, favour, direct or indirect unlawful benefits or information that are inconsistent with normal business ethics.

14. Working conditions, occupational health and safety

The Suppliers comply with all requirements of legal acts relating to the provision of appropriate working conditions. They provide their employees with dignified, safe, and healthy working conditions, and provide necessary and appropriate working means, tools, and personal protective equipment. Also, the Suppliers encourage employees to report inappropriate or unsafe working conditions, implement preventive measures and protect individuals who have reported incidents in the workplace. The Suppliers recognize the rights of employees to join associations or trade unions and to represent them in negotiations with the employer regarding the working conditions of employees. Employees are paid fair wages for their work and are guaranteed rest in accordance with the legal acts.

15. Environmental protection and climate change.

The Suppliers use energy resources and other resources in a responsible, efficient, and economical manner. They carry out their activities in compliance with all mandatory environmental requirements. The Suppliers have in place effective environmental protection systems, policies and/or measures in their activities that enable them to properly manage environmental risks. The Suppliers are encouraged to assess the negative environmental and climate impacts of their activities and to put in place measures to reduce such impacts. Waste generated in the activities of the Suppliers is sorted and managed in accordance with the requirements of the applicable legal acts.

16. Business ethics.

The Suppliers maintain transparent, harmonious relations with the SE INPP and other partners based on cooperation and good responsible business practices. The Suppliers, as well as persons investing in them, during the entire period of cooperation with the SE INPP undertake to comply with the national security interests of the Republic of Lithuania and to manage their supply chains in such a way as to reduce their dependence on producers or suppliers from countries that do not meet the criteria of European and transatlantic integration. The Suppliers are encouraged to avoid developing business relationships with entities of dubious reputation, unreliable or registered in countries subject to European Union or United Nations sanctions. The Suppliers shall always be prepared to provide the requested information on the participants in the supply chain and the final beneficiaries.

CHAPTER IV FINAL PROVISIONS

- 17. SE INPP has the right to unilaterally change or revoke the Code of Ethics for the Suppliers without prior notification of the Suppliers.
- 18. The Suppliers undertake to have in place effective systems, policies and/or measures for the implementation of the Code of Ethics for the Suppliers. The SE INPP have the right to request the Suppliers at any time to provide information or evidence on compliance with this Code of Ethics for the Suppliers.
- 19. The SE INPP constantly analyses the reputation and reliability of the Suppliers implementing the contracts, verifies the information on the absence of grounds for exclusion, performs audits of the activities of the Suppliers and evaluates the information collected and/or received.
- 20. The Code of Ethics for the Suppliers is publicly available on the Enterprise's website.

21. The Code of Ethics for the Suppliers is approved, amended, and repealed by the order of the Director General of SE IAE.

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