

DVAS
2023-02-20 No DVSta-0101-4V2

APPROVED

By the Decision of the Management Board
of the SE Ignalina Nuclear Power Plant
(Protocol No VPP-2(1.160E)
of 20 February 2023)

CORRUPTION PREVENTION POLICY OF THE STATE ENTERPRISE IGNALINA NUCLEAR POWER PLANT

CHAPTER I GENERAL PROVISIONS

1. The Corruption Prevention Policy (hereinafter referred to as the Policy) of the State Enterprise Ignalina Nuclear Power Plant (hereinafter referred to as the Enterprise, INPP) has been prepared in accordance with the Law of the Republic of Lithuania on Prevention of Corruption, other legal acts, and the Statutes of the Enterprise.

2. The purpose of this Policy is to set out the main commitments of the Enterprise on prevention of corruption, the implementation of which shall ensure the prerequisites and conditions for creating a corruption-resistant environment, raising anti-corruption awareness, and implementing the highest standards of transparency.

3. This Policy shall replace the Corruption Prevention Policy of the State Enterprise Ignalina Nuclear Power Plant, DVSta-0101-4V1.

4. The terms used in the Policy are as defined in the Law of the Republic of Lithuania on Prevention of Corruption, the Law of the Republic of Lithuania on Protection of Rapporteurs, and other legal acts.

CHAPTER II CORRUPTION PREVENTION COMMITMENTS

5. **Zero-tolerance for corruption.** The Enterprise shall not tolerate corruption in any form and shall be committed to take measures to prevent any form of corruption.

6. **Compliance with legitimacy and the highest ethical standards.** The employees of the Enterprise shall comply with the laws of the Republic of Lithuania, international and European Union legal acts, and the requirements of other legal acts of the state government and management authorities applicable to the Enterprise. In situations where this Policy, laws or other legal acts do not provide for relevant standards of conduct, the Enterprise shall behave in such a way that the Enterprise's behaviour is consistent with the highest standards of reliability, integrity and transparency acceptable to the society.

7. **Personal example of the heads.** It shall be the responsibility of every head to inspire good behaviour through personal example, communication to employees and a culture of zero tolerance for corruption.

8. **Employee engagement.** Employees shall be constantly informed about the implementation of the Policy, and anti-corruption training is periodically organised. The aim of this is to increase the anti-corruption awareness of employees, to promote anti-corruption practices. All employees of the Enterprise shall be personally responsible for understanding, fulfilling and applying the requirements of this Policy as they relate to their duties.

9. **Transparency.** The Enterprise shall comply with the requirements of legal acts and disclose its financial statements as required by the legal acts governing its activities. The main documents of the Enterprise shall be publicly available, ensuring full disclosure of non-confidential information.

10. **Avoidance of conflicts of interest.** The employees of the Enterprise shall avoid any conflict of interest which may adversely affect the impartial and objective performance of their duties or functions. Private interests shall be declared and conflicts of interests shall be managed in accordance with the procedure established by the Enterprise.

11. **Intolerance of nepotism and cronyism.** The employees of the Enterprise shall not engage family members, relatives, other related persons and friends in a relationship of direct subordination and control.

12. **Personnel reliability.** Only persons with good reputation can be employed at the Enterprise. The risk of corruption in decision-making at all levels shall be assessed at the Enterprise and appropriate measures shall be taken to prevent conflicts of interest and to check the good reputation and integrity of candidates and employees, in accordance with the laws and other legal acts.

13. **Abuse.** The Enterprise shall not tolerate any abuse of the position. All property, confidential information, resources, finances of the Enterprise shall be used only for the purposes and needs of the Enterprise, and their use shall be regulated by internal legal acts.

14. **Gifts and hospitality.** The Enterprise shall not tolerate any gifts or services provided or received in connection with employment or position, except:

- provided or received in accordance with an international protocol (the value of which does not exceed 150 Euro),
- intended for representational purposes (symbolics, calendars, books and other printed publications of an informative character, the value of which does not exceed 150 Euro),

– services provided or offered that are used solely when performing work for or representing the Enterprise. It is intended that all expenses related to conferences, trips or events, if the organizer is a potential supplier, should be paid by the Enterprise itself.

Gifts shall be registered in accordance with the procedure established at the Enterprise.

It shall be prohibited to accept any gifts in cash, gift vouchers (coupons) or alcoholic beverages, as well as gifts of low value, if the circumstances of their provision or acceptance could give rise to a misunderstanding or contradiction and the appearance of a conflict of interests. The offer, receipt and provision of a gift or exclusive benefit of significant value may be considered as an attempt to bribe and must be reported to the Prevention Division of the Enterprise, which is responsible for the prevention of corruption, and to the competent authorities.

In order to assess whether gifts and hospitality are acceptable, each offer must be evaluated against the criteria set out in the Annex to the Policy. The Enterprise may establish detailed rules for the acceptance of gifts.

15. Transparent procurement. The Enterprise shall ensure that all purchases shall be carried out in a transparent manner, in accordance with the requirements of equal treatment, non-discrimination, mutual recognition, proportionality and impartiality, with the rational use of funds, the establishment of equal and non-discriminatory conditions to suppliers, both at the time of purchase and the performance of the contract.

16. Provision of support. In accordance with the Law on Charity and Sponsorship of the Republic of Lithuania, the Enterprise may not and does not provide any support to natural or legal persons.

CHAPTER III POLICY IMPLEMENTATION, SUPERVISION AND CONTROL

17. The Enterprise shall determine the level of resistance to corruption in accordance with the procedure established by the Government of the Republic of Lithuania and shall make the assessment public.

18. The Enterprise shall ensure that all possible violations of the Policy are investigated properly. The results, conclusions and proposals of the investigation shall be submitted to the Director General of the Enterprise.

19. In order to properly manage the risk of corruption, periodic identification and assessment of corruption risk factors shall be carried out and management measures shall be planned, including the identification of the probability of corruption occurring.

20. The employees of the Prevention Division shall be responsible for control the corruption prevention at the Enterprise.

CHAPTER IV REPORTS ON VIOLATIONS

21. The Enterprise shall make it possible for all interested persons to report any appearance of corruption or any other violation that has occurred, is occurring or is intended to occur.

22. The employees of the Enterprise and other interested persons are encouraged to report any corruption or other violations that have occurred, are occurring, or are intended to occur within the Enterprise through the Enterprise's publicly available reporting channels.

23. Reports received shall be forwarded to the Prevention Division and/or the competent authority for investigation in accordance with the Law of the Republic of Lithuania on Protection of Rapporteurs, other legal acts, and the procedures established by the Director General of the Enterprise.

24. The Enterprise shall take all measures to protect the reporting persons from any possible negative consequences and to ensure the confidentiality and anonymity of personal data, in accordance with the provisions of the laws and other legal acts. The rapporteur protection provisions also apply if it becomes known that the information provided by the person has not been confirmed.

CHAPTER V RESPONSIBILITY

25. Violation of the provisions of this Policy may be considered as a serious breach of work duties obligations.

26. In the event of identification of actions that do not comply with the provisions of the Policy or that are indicative of corruption, disciplinary measures shall be taken immediately, and in the event that the actions are found to be indicative of criminal offences, the Enterprise shall inform the competent authorities of law enforcement and may be subject to the liability provided for by legal acts.

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*Translated by Ema Banevičienė, Translator of
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E. B., 1, 2023-03-17

QUESTIONNAIRE ON THE ACCEPTING OF GIFTS OR HOSPITALITY*

1. Why is the gift/invitation is offered? Is anything expected in return for accepting it?
2. How does the gift/invitation relate to the Enterprise's activities and am I the right person to accept the offer?
3. Is the Enterprise currently negotiating with the person offering the gift/invitation? Is he involved in the purchase/sale procedures? Does he take part in tenders organised by the Enterprise?
4. If I accept a gift/invitation, can I justify my decision publicly to my colleagues, the media and the public?
5. Does the person offering the gift/invitation often make such offers?
6. If the gift/invitation is offered only to me, why is it offered to me?
7. Does accepting a gift not make feelings of any possible obligation to the gift-giver?
8. Does the gift-giver not influenced by the ambiguous behaviour, by allowing him to give a false opinion that gift (reward) is welcome and expected to be?
9. Will representatives from other companies attend the free event?
10. Is the acceptance of the relevant invitation is agreed with my manager (the person who has appointed to the position)?

* If in doubt on the acceptability of gifts and hospitality, it is necessary to comply with the following legal provisions or to consult with the Prevention Division for advice:

1. Code of Ethics for Employees of the SE Ignalina Nuclear Power Plant, DVSta-1451-2;
 2. The description of the procedure for controlling of compliance with the provisions of the Law of the Republic of Lithuania on coordination of public and private interests, and the Law of the Republic of Lithuania on lobbying activities, DVSta-1408-15;
 3. The description of the procedure for the transfer for safekeeping, valuation, accounting and storage of gifts received on behalf of the State Enterprise Ignalina Nuclear Power Plant, approved by the Order of the Director General of the State Enterprise Ignalina Nuclear Power Plant, No. VĮs-114 of 26 April 2017 (with amendments).
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