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| Limited Liability Company |
| **Rosatom Middle East and North Africa** |
| Local Regulation |

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|  | **Policy**  |
| **ANTI-CORRUPTION POLICY** |
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1. **Intended Purpose and Scope of Application**

1.1. The intended purpose of the document "Anti-Corruption Policy" is to establish the basic principles of anti-corruption, methodological approaches and tools which, if followed, enables to:

1) Form regulatory, methodological and organizational bases for combating corruption;

2) Inform companies in the nuclear industry of the legal support of anti-corruption work and liability for committing corruption offenses;

3) Ensure:

Implementation of legislative acts and management decisions in the field of anti-corruption, create conditions that complicate the possibilities of corrupt behavior and ensure a reduction in the corruption level;

Compliance by the Company's employees with the norms of anti-corruption behavior;

Use of coercive measures provided for by the legislation of the UAE.

1.2. The Anti-Corruption Policy has been issued in compliance with the anti-corruption legislation of the UAE and the Anti-Corruption Policy of Private institution RAIN.

1.3. The Anti-Corruption Policy is the basis for development of regulatory and methodological documents for any groups of processes in terms of ensuring the anti-corruption focus of these documents.

1.4. The Anti-Corruption Policy is applied when the Company carries out planning, regulation, organization, control of performance, development and adoption of remedial measures and other control activities in all operational processes containing risks of corruption or other offenses, and is applicable to the Company's employees, regardless of their position and functions performed.

1.5. All employees of the Company are users of the Anti-Corruption Policy.

1. **Definitions and Abbreviations**

2.1. The following abbreviations are used in the Anti-Corruption Policy:

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| Definitions and Abbreviations | Explanation  |
| Assets  | The Company's resources, including objects of civil rights (property assigned by the Founder to the Company on the right of operational management and acquired by the Company on other grounds; information, including legally protected secrets, etc.) |
| Safety | Absence of unacceptable (significant) risk associated with potential damage - the optimal balance of many factors (including human behavior) that enables to reduce the avoidable risk associated with the possibility of damage to human health and the safety of property to an acceptable (insignificant) level |
| Officials  | Persons who permanently, temporarily or by special authority perform organizational and administrative, administrative and economic functions in the Company |
| Company Executives | Director General |
| Asset protection | Activities aimed at combating corruption and other offenses |
| Other offenses  | Actions (inaction) and decisions of citizens, organizations and (or) their officials that hinder and (or) threaten the exercise of the rights and legitimate interests of the Company, including those in relation to its assets |
| Corruption | Illegal use by officials of their official (employment) powers and related resources in order to obtain or receive personally or through intermediaries material (non-material) benefits and advantages for themselves or for third parties, as well as giving bribes to these persons by providing benefits and advantages to them; |
| Corruption prevention  | Activities of the Company focused on introduction of the elements of corporate culture, organizational structure, as well as rules and procedures governed by internal regulations to prevent corruption-related law violations |
| Combating corruption | The activities of anti-corruption entities within their powers to prevent corruption, including formation of anti-corruption culture in the society, identification and elimination of causes and conditions contributing to the commission of corruption offenses, as well as identification, suppression, disclosure and investigation of corruption offenses and elimination of their consequences; |
| Founder | Private institution RAIN |

**3. Basic principles of anti-corruption activities, approaches to its
implementation, as well as the instruments used**

3.1. Anti-corruption in the Company is based on the following principles provided for by Law No. 410-V:

1) Legality;

2) Priority of protecting the rights, freedoms and legitimate interests of man and citizen;

3) Publicity and transparency;

4) Interaction between the state and civil society;

5) Systemic and comprehensive use of anti-corruption measures;

6) Priority application of measures for the corruption prevention;

7) Encouragement of persons providing assistance in combating corruption;

8) Inevitability of punishment for committing corruption offenses.

3.2. The following methodological approaches are used in the implementation of anti-corruption activities in the Company:

1) System-situational approach, when countering corruption is ensured during the implementation of all types of financial and economic activities with the participation of the Director General, whose powers include countering corruption and other offenses;

2) Role-based approach, when each participant, fact, object of organizational, financial, economic and other activities carried out in the Company, as well as its counterparties, are simultaneously considered in the roles of the subject and object of security, ­source and object of the threat of corruption and other offenses;

3) Risk-oriented approach means planning and implementation of the activities of Director General, whose authorities include countering corruption and other offenses, based on the analysis and assessment of the identified risks inherent in the operational processes implemented in the Company, as well as the concentration of anti-corruption efforts at facilities previously exposed to corruption;

3.3. In combating corruption, the Company uses the following standard tools:

1) Modeling threats, possibilities for the implementation thereof, vulnerabilities used by sources of threats, possible losses and the scale of potential damage;

2) Automation of anti-corruption management processes;

3) Controlling (planning, recording, analysis of the state and (or) vulnerability) of the Company's assets, as well as exposure of employees to corruption-related factors (influences), continuous assessment of the acceptability of the identified risks, the probability, directions and scale of implementation thereof based on collection, analysis and synthesis of the relevant information;

4) Information provision as the development of proposals and draft decisions on the application of control and (or) remedial actions based on the results of controlling;

5) Methodology as organizational, advisory and methodological support on the following issues (including, but not limited to):

Compliance by the Company's employees with restrictions and prohibitions, requirements to prevention or settlement of conflicts of interest, and performance of their other duties established by the legislation of the UAE (hereinafter referred to as the requirements to official conduct);

Advisory assistance in the practical application of the requirements to official conduct;

Education of employees in the field of law;

Performance of service checks;

Preparation, including anti-corruption expertise, of draft local regulations and legal acts, including those on anti-corruption;

Interaction with law enforcement agencies in the established field of activity.

**4. Company officials responsible for the implementation of the Anti-Corruption Policy**

4.1. Responsibility for the implementation of the Anti-Corruption Policy (ensuring compliance with its principles and approaches, the use of tools) in the Company is assigned to Director General.

**5. Procedure for making changes**

The person responsible for updating the Anti-Corruption Policy in the Company is the office manager.

**6. Control and responsibility of employees for non-compliance with the
requirements of the Anti-Corruption Policy**

6.1. The Company's employees bear responsibility under the legislation of the UAE for non-compliance with this Anti-Corruption Policy and with the Company's local regulations issued in accordance with the Anti-Corruption Policy.

6.2. The Company's managers are personally responsible for non-compliance with the principles of the Anti-Corruption Policy in the Company.

6.3. Control over compliance with the requirements of the Anti-Corruption Policy in the Company is exercised by Director General.