

**DECLARATION OF THE MANAGEMENT  
OF THE “HAYKAKAN ATOMAYIN ELECTRAKAYAN” CJSC  
ON ANTI-CORRUPTION POLICY**

The management of the “HAEK” CJSC acknowledging its responsibility for compliance with the current legislation of the Republic of Armenia adheres to high standards of conducting honest, conscientious and transparent business.

The management of the “HAEK” CJSC declares that in its performance it adheres to the principle of non-acceptance of corruption in all its forms and manifestations and considers it its duty to promote an increase in the level of anti-corruption culture in “HAEK” CJSC.

The management of the “HAEK” CJSC takes all necessary measures to minimize the risk of business relations with individuals and companies that have been or may be involved in corrupt activities.

**The main principles of combating corruption in “HAEK” CJSC are:**

- **The principle of compliance with the current Legislation**  
Compliance of anti-corruption measures implemented at the “HAEK” CJSC with the current Legislation and other regulatory legal acts of the Republic of Armenia.
- **The principle of the personal example of leadership**  
The key role of the management of the “HAEK” CJSC in the formation of a culture of intolerance to corruption in the company and in the creation of a system for preventing and combating corruption.
- **The principle of the staff involvement**  
Awareness of employees of the “HAEK” CJSC about the provisions of the Anti-Corruption Legislation of the Republic of Armenia and their active participation in the formation and implementation of measures to combat corruption in the company.
- **The principle of proportionality of anti-corruption procedures to the corruption risk**  
Development and implementation of a set of measures which enable reducing the likelihood of the involvement of managers and employees of the “HAEK” CJSC in corrupt activities, taking into account existing corruption risks.
- **The principle of effectiveness of anti-corruption procedures**  
Development and implementation of economically sound measures to prevent and combat corruption, which are simple to implement and at the same time allow for a significant reduction of the possibility of corruption risks.
- **The principle of responsibility and inevitability of punishment**  
Inevitability of punishment for employees regardless of the position they hold, length of service and other conditions when committing corruption offenses in connection with the performance of their work duties.
- **The principle of transparency of business**  
Informing partners and the public about the anti-corruption principles of doing business adopted by the “HAEK” CJSC.
- **The principle of continuous control and regular monitoring**  
Implementation of continuous control over the execution and regular monitoring of the effectiveness of the introduced anti-corruption principles and procedures.

➤ **The principle of due prudence**

Screening of candidates applying for a job at the “HAEK” CJSC to determine their trustworthiness, intolerance of corruption and absence of conflicts of interest.

➤ **Security guarantee**

Ensuring the anonymity and confidentiality of information received on corruption offenses in the process of the “HAEK” CJSC production activities.

All employees of the “HAEK” CJSC, regardless of their position, status and length of service, must strictly adhere to the principles and requirements of the anti-corruption policy aimed at combating corruption and minimizing the risk of corruption.

The “HAEK” CJSC also expects its partners to comply with anti-corruption principles.

The management of the “HAEK” CJSC expects employees of the company and contractors to report any suspected or actual fact of corruption, as well as any actions (inactions) that may lead or have led to violations of the anti-corruption legislation of the Republic of Armenia and guarantees compliance with the principles of anonymity and confidentiality with respect to applicants and incoming messages.

Consistent implementation of the adopted anti-corruption policy will increase the safety and efficiency of the Armenian NPP and public confidence in nuclear energy.

to the Order dated February "\_\_\_\_", 2026

APPROVED BY

HAEK CJSC DIRECTOR GENERAL

\_\_\_\_\_ E.Martirosyn

« \_\_\_\_\_ » February, 2026

## MEMO

### on the Procedure for Reporting Facts and Suspicions of a Corrupt Nature

*Dear employees of HAEK CJSC and contracting organizations,*

Countering manifestations of corruption is one of the key elements in ensuring the economic, operational, nuclear, physical, and radiation safety of the ANPP. Corruption threatens the safety and reputation of the plant.

In accordance with the RA Government Decree No. 48-L dated January 14, 2021, and with the aim of ensuring the effective management of ANPP operations, an Anti-Bribery Management System has been implemented at the plant in compliance with the requirements of the international ISO 37001:2016 standard.

On May 13, 2025, the "Code of Ethics and Professional Conduct for Employees of HAEK CJSC was approved. This code adopted the "Declaration of the HAEK CJSC Management in the Field of Anti-Corruption," according to which all ANPP employees—regardless of their position, status, or length of employment at the plant—must strictly adhere to the principles and requirements of the anti-corruption policy aimed at countering corruption and reducing corruption risks.

## **Procedure for Reporting Facts and Suspicions of a Corrupt Nature**

### ***1. What to report***

- reporting on demanding, offering, giving, receiving, extorting a bribe, or mediating for a bribe in order to perform an official action
- reporting on the use /abuse/ of official position for the purpose of pursuing personal interests
- reporting on conflicts of interest (personal interest, family ties, interconnectedness)
- reporting on exerting illegal influence on procurement and tender processes
- reporting on violations occurring during the acceptance process of completed works, services rendered, and goods purchased (e.g., signing acceptance certificates for "paper-only" transactions or incomplete deliveries, accepting goods, services, or works that do not comply with the procurement specifications, etc.)
- reporting on the falsification of documents, reports, and audit/inspection results
- reporting on violations in the field of human resources policy (e.g., conducting formal/fictitious competitions, hiring, promoting to high-level positions, or certifying individuals who are unqualified or lack the necessary skills, etc.)
- reporting on favoritism/patronage exercised through the use of official position (e.g., giving preference in various fields to friends, relatives, or political allies)
- reporting on other actions or inactions of a corrupt nature

### ***2. Who can report***

- any employee of HAEK CJSC, regardless of their position
- employees of contracting organizations

### ***3. How to Report Information***

- submit to the management of HAEK CJSC in accordance with the established procedure
- submit in written (including **anonymous** letters sent to the email address) or oral form to the employees of the Economic Security Group (ESG) of HAEK CJSC

### ***4. What should the submitted information contain?***

- nature of the incident /what has occurred
- date and location of the incident
- details of the persons involved
- available evidence /documents, correspondence, information about witnesses

**The information will be reviewed even in the event of incomplete data, provided that it has been submitted in good faith.**

## **5. Guarantees for whistleblowers reporting corruption facts and suspicions**

- confidentiality of the information source
- protection of the person reporting the information
- prohibition of retaliation, pressure, and discrimination for reporting information in good faith (retaliation against a person who reported information constitutes a violation of the legislation of the Republic of Armenia and the requirements of the ISO 37001:2016 international standard)
- review of any information in accordance with the established procedure

## **6. Responsibility**

- submitting intentionally false information entails liability in accordance with the legislation of the Republic of Armenia
- failure to report known information regarding corruption-related offenses, intentional concealment of information, or being informed and remaining inactive may be considered a breach of official duties

**The Memo is subject to mandatory familiarization by the personnel of HAEK CJSC and all employees of contracting organizations involved in business relations with the ANPP**

If necessary, the Economic Security Group of HAEK CJSC will provide consultation on countering corruption phenomena.

### **Contact Details:**

Official phone number of the Economic Security Group: **30-40, 53-96**

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