





# CODE OF SAFETY AND **BUSINESS ETHICS**



March 2024

## CONTENTS

MESSAGE FROM THE MANAGEMENT BOARD			5
INTRODUCTORYADDRESS			9
I. –	ΒL	JSINESS FRAMEWORK	13
	οι	IR VISION	15
	οι	IR MISSION	15
П.	VA	LUES	17
	CORE VALUES		18
		Safety Culture	18
		Excellence in Relations	18
		Comprehensive Employee Development	18
	PERSONAL VALUES Professional Competence		19 19
		Responsibility	19
		Trust	19
		Communication	19
		Respect	19
Ш.	PRINCIPLES OF CONDUCT AND ACTION PER AREAS		21
	1.	SAFETYCULTURE	22
		Personal Responsibility	22 22
		Questioning and Analytical Attitude Efficient and Effective Communication	22
		Management's Attitude toward Nuclear Safety	23
		Effective Decision-making	23
		Respectful Working Environment	23
		Experience-based Learning Problem Identification and Resolution	24 24
		Freedom to Report	24
		Work Processes	24
	2.	INTERPERSONAL RELATIONSHIPS	25
		Respect for Human Rights	25
		Equal Opportunities	25
		Creating a Positive Work Environment	25
		Able and Trustworthy Manager Respect for Human Dignity	26 26
		Building a Good Public Image of the Company	26

- 3. EMPLOYEE DEVELOPMENT Long-term Recruitment Strategy Transfer of Knowledge and Skills Systematic Approach to Training Employee Development Dialogue
- 4. OCCUPATIONAL SAFETYAND HEALTH Zero Occupational Injuries and Illnesses Preventive Health Measures Drug-free Workplace Medical Treatment Workplace Health Promotion (WHP)
- 5. BUSINESS ETHICS Legality of Work Business Gifts Conflict of Interests Anticorruption Clause Donations
- 6. CORPORATE RESOURCE MANAGEMENT Intellectual Property Financial Resources Material and Capital Assets Information Technology (IT) Artificial Intelligence (ÁI)
- 7. ENVIRONMENTAL PROTECTION Complying with Environmental Regulations
- 8. INFORMATION PROTECTION

Information Property Protection Responsible Information Handling Personal Data Protection

9. PUBLIC RELATIONS

Information Credibility Information Sensitivity Proactive Communication Internal Communication Informal Communication

- **10. SECURITY OF NEK**
- 11. RELATIONSHIP WITH BUSINESS PARTNERS Anticipated Conduct with Business Partners Appropriate Working Conditions Environment **Business Integrity**
- 12. SUSTAINABILITY



MESSAGE FROM THE MANAGEMENT BOARD

## Dear colleagues,

With professional and committed work, the NEK employees, together with permanent external contractors, fulfilled the administrative requirements for the long-term operation of the power plant in 2023, with responsible management, good maintenance, and constant updating of processes and equipment. We have completed the demanding environmental impact assessment process to obtain environmental consent for the operation of the power plant until 2043. By transferring part of the spent fuel to dry storage, we have completed a ten-year program of technical safety upgrades, which means additional resistance of the power plant to unlikely extreme natural and other events, and completed the third periodic safety review. Regarding safety standards, the power plant is comparable to those being built today. We have reasons to be satisfied with this joint success, but at the same time, we are aware that we can do more – both in interpersonal relationships and business operations. We remain committed to the vision of being an example of nuclear safety and excellence at the global level. We know that excellence is a journey, not a destination.

The key to our success is our professional and committed employees, who, among other things, have successfully modernized the power plant technologically, thereby enabling its long-term and safe operation. Values and principles guide us at work, so our daily actions should reflect what is written in the Code. For the first time, we summarized the principles of safety culture and business ethics in the Code more than two decades ago, when the Intergovernmental Agreement was implemented, which, together with nuclear legislation and standards, is the external framework of our operation and business.

Today's time is marked by the challenges of development in transport electrification, digitization, and global coping with climate change, an inevitable part of which is the energy sector's transformation. Discussions about achieving climate neutrality bring nuclear power back into the public spotlight. Due to the requirements of European legislation, companies have recently been paying a lot of attention to sustainability issues. For all forty years of operation, NEK has been working based on sustainable development and is aware of its responsibility towards current and future generations. We have also written down aspects of sustainable business to which we are committed in the Code. We checked our views on using artificial intelligence in the work environment and re-examined the values and principles of behaviour and operation.

With ambitious goals and exemplary work and cooperation, we will strengthen our place on the energy map and provide nuclear energy with the place it deserves in the global transformation of the energy sector. Let the Code prove the strength of the bonds that unite us in working on our shared values as we create an energy-safe and reliable future.

Member of the Management Board Saša Medaković



President of the Management Board Gorazd Pfeifer



## Dear Reader,

The Code of Safety and Business Ethics provides all NEK's employees with guidelines tuned to the primary ethical and moral orientation of our company and should, therefore, become a tool to support decisionmaking on all levels and in business situations.

It's the mirror of shared values, behaviour, and safety culture of the NEK company, its employees, business partners, and the public supporting nuclear safety, sustainable development of the staff, and business environment as well as promoting excellence in every action and relation.

#### PURPOSE OF THE CODE

Transparent and future-oriented plant operation in the light of ethics, relationships, and social integration.

#### MISSION OF THE CODE

To help employees, business partners, and the wider public understand

- decision-making,
- personal and collective responsibility,
- corporate values,
- rules of operation on-site and off-site.

The document explains our directions and behaviour concepts.

#### **APPROACH**

The plant employees were actively engaged in the Code's development, making it even more valuable and binding.

ABIDING BYTHE RULES OF THE CODE is a must for every employee and everyone who cooperates with the plant in any way. Violating these rules can jeopardise nuclear safety, relationships, and the plant's reputation. Failure to comply with the Code could mean infringement of the Employment Contract and could lead to disciplinary action.

Masculine nouns and pronouns are used when the gender of their subject(s) is unclear or variable, or when a group to which they are referring contains members of both sexes.

#### DRAWING ATTENTION TO DEROGATIONS

We invite you to report any derogations from the principles of this Code to the responsible department superintendent or the Management Board.

#### **KEYWORDS**

Vision, mission, values, key rules of behaviour, and action.

#### VALIDITY

INTRODUCTORY ADDRESS

Code of Safety and Business Ethics is available at the NEK's portal and web pages. It supersedes the Code of Safety and Business Ethics of 2021.

It is delivered to every employee, newcomer, and permanent contractor.





## **OUR VISION**

World-wide Leader in Nuclear Safety and Excellence.

## OUR MISSION

### is to ensure

- safe and stable plant operation pursuant to the leading standards which ensure individual and collective safety;
- competitive production of electrical power;
- public acceptance based on transparent and honest operation and positive attitude towards the environment;
- critical self-assessment and permanent improvement.



## CORE VALUES

Core values are our platform for action, a basis and condition for attaining our vision and mission. They are implanted into our work processes and relationships. They define the basic features of employees and their relationship to the world and business environment. We live by our core values; the professional and general public recognize us by them.

#### **SAFETY CULTURE**

Safety culture is defined as employee behaviours that establish safe and stable plant operation together with the health and safety of employees, business partners, and the wider public. These are universal characteristics that establish approaches to work in nuclear facilities.

#### **EXCELLENCE IN RELATIONS**

Excellent interpersonal relationships and positive attitudes on all levels of activity lead to continuous success. We strive for environmentally and socially responsible production. We reinforce respect and trust in dealing with employees, business partners, and the public as well as abide by the law and regulatory limitations.

### COMPREHENSIVE EMPLOYEE DEVELOPMENT

People with the needed knowledge, competence, skills, and values are the strategic asset and a key factor in nuclear safety, long-term stability, competence, and success. Only a person who constantly learns and develops is flexible, creative, and capable of adapting to changes.

## PERSONAL VALUES

Personal values are cornerstones of our inner world, guiding our conscious and unconscious decisions. When constantly reinforcing and developing personal values in ourselves, newcomers, and our partners, we significantly contribute to creating and realizing the core system values.

#### PROFESSIONAL COMPETENCE

Employees possessing, upgrading, using, and sharing expert knowledge with peers are competent NEK employees.

#### RESPONSIBILITY

Employees attentive to jobs, actions, legal norms, regulatory restrictions, equipment, work processes, co-workers, and the environment are responsible NEK employees.

#### TRUST

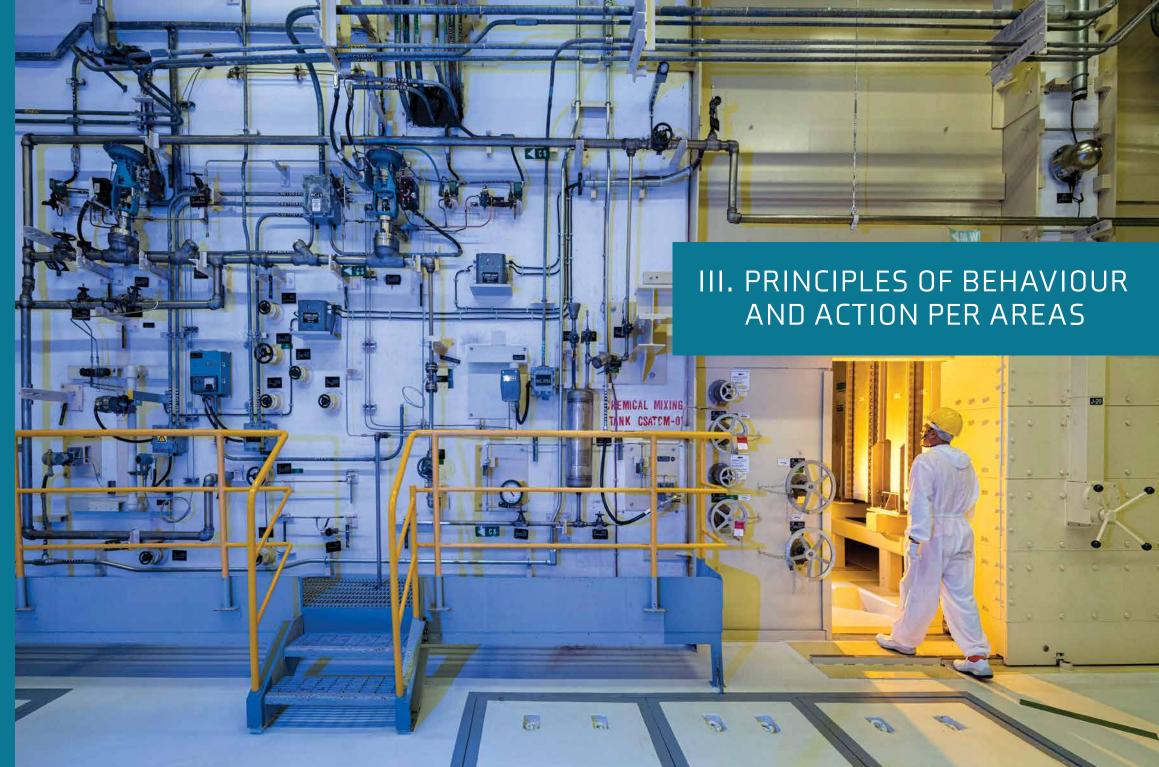
A trustworthy NEK employee builds trust and cooperation among peers and business partners in an honest, trustworthy, and principled way in concert with universal provisions established in an organised system of the nuclear industry worldwide.

#### COMMUNICATION

NEK employees communicate adequately when understanding teamwork tasks, responding positively, and providing quality, comprehensive, and suitable information for timely and efficient decision-making. By creating good communication, he fosters healthy relationships that drive self and collective motivation and efficiency.

#### RESPECT

NEK employees show respect for themselves, their co-workers, and other business partners when communicating openly and honestly, thus protecting every individual's human dignity and integrity.



## 1. SAFETY CULTURE

#### PERSONAL RESPONSIBILITY

We – NEK employees, acting on the basis of NEK values, are personally responsible for nuclear safety within the scope of our competence. The scope of our competence and responsibility is clearly defined; we are aware of it. Our attitude toward nuclear safety is shown with due regard for work standards and consistent reporting of safety-related problems. We prioritize dealing with and responsibly solving safety issues in the workplace and within teams.

We ensure the appropriate transfer of knowledge, experience, and skills and the effective assuming of responsibility for safe and stable long-term operation. Let's be an example and assume responsibility at all levels of operation.

#### **QUESTIONING AND ANALYTICAL ATTITUDE**

We are aware that nuclear technology is unique, exceptional, and complex. Therefore, we demonstrate a questioning attitude to operating conditions and activities to timely discover possible deviations that could result in improper operation or behaviour. We are all attentive to inadequate working practice, unsuitable working conditions, and risks as well as deviations that could cause undesired operating events.

#### EFFICIENT AND EFFECTIVE COMMUNICATION

The main subject of our communications is how to ensure nuclear safety. Employees communicate about deviations in technological processes, operational risks, work processes and tasks, operating experience, and documentation. Managers use formal and informal communication and provide safety-related information. They encourage transparent communication between employees and ensure good information flows up and down the company hierarchy.

### MANAGEMENT'S ATTITUDE TOWARD NUCLEAR SAFETY

Managers are role models for promoting safety awareness. Their decisions, behaviour, and efforts reflect the importance of constantly reducing operational risks. They treat nuclear safety as the top priority at all levels and frequently share its message with employees, sometimes as a stand-alone theme. Managers constantly assess nuclear safety; they are present in workplaces to consult and enforce work standards.

#### EFFECTIVE DECISION-MAKING

Any decisions supporting or influencing nuclear safety are made systematically, conservatively, and after careful consideration. In case of unexpected events and uncertainties, operators have the right and responsibility to ensure the safe operating mode of the plant. Management supports and enforces conservative decision-making which gives priority to proven safety measures.

#### **RESPECTFUL WORKING ENVIRONMENT**

With mutual trust and respect as well as thorough and timely communication, we build and stand for a respectful workplace. We respect the integrity and dignity of every individual and his commitment to common goals. Trust and collaboration are the backbone of our work results. We appreciate different views on open questions and consider them in decision-making. Also, we encourage the employees' improvement initiatives, discuss them, and inform employees about the responses.

22

#### EXPERIENCE-BASED LEARNING

We promote permanent learning and upgrade systematic approach to training, deepening, and broadening the knowledge, focusing on understanding the special features of nuclear technology and safety. Best practices in managing operating experience at nuclear power plants worldwide represent a crucial point in experiencebased learning. We consistently self-assess our work processes and compare our work practice against comparable organisations (benchmarking).

#### PROBLEM IDENTIFICATION AND RESOLUTION

Corrective Action Program (CAP) is a tool for systematic identification, analysis, and elimination of the found deviations in technological systems, work processes, human performance, and organisation. We eliminate deviations commensurate with their nuclear safety significance. Team leaders periodically verify the effectiveness of the CAP and study its realisation rate.

#### FREEDOM TO REPORT

In our positive work environment, everybody is allowed to ask a safety-related question without fear of intimidation, harassment, and discrimination by the management in the process which ensures confidentiality and a blame-free reporting environment.

#### WORK PROCESSES

We plan work processes to support nuclear and radiation safety as well as occupational health and safety. A work process is a process in which work is proposed, planned, performed, concluded, and documented. It covers risk identification and management. Our primary concern is related to both barriers preventing the release of fission products into the environment and design margins. We maintain a transparent system configuration and ensure comprehensive and updated technological documentation. We carry out work processes in such a way that they protect the health, lives, and working capacity of workers.

## 2. INTERPERSONAL RELATIONSHIPS

### **RESPECT FOR HUMAN RIGHTS**

Our work environment is free from exclusions based on gender, religion, political, or any other beliefs, trade union membership, national and social origin, family status, financial condition, or other personal circumstances. The principle of non-discrimination is enjoyed in all work circumstances, starting with recruitment.

#### EOUAL OPPORTUNITIES

We appreciate the diversity of the workforce who want to participate in achieving our common goals by their abilities, responsibility, and commitment. Such co-workers are the source of success in our company. We wish to cooperate based on knowledge and clear development goals and ensure equal rights and possibilities for every employee, also during recruitment.

#### **CREATING A POSITIVE WORK ENVIRONMENT**

Our business culture and work environment attract and encourage the employees to be committed and responsible. We at NEK respect people and their rights and offer them work security and reasonable working conditions. Systematically developing their competencies, we are committed to business excellence. We create trust with open, honest, and unambiguous communication. Also, we are willing to assume responsibility, listen to co-workers, cooperate, and act positively.

#### ABLE AND TRUSTWORTHY MANAGER

The NEK management is in charge of work processes and people in compliance with our values, mission, and vision to reach key operational goals. It is their task to put basic nuclear directions of the nuclear industry and the owners into action and sort out priorities so that employees can understand their roles in the company's success. Managers make decisions that directly affect operation and safety results, employee development, and commitment. They support employees in achieving operational effectiveness and build mutual trust; they are highly visible and accessible.

#### **RESPECT FOR HUMAN DIGNITY**

We treat everyone with respect and ethics. There is no room for discrimination, violence, or harassment. We make sure that there is no discrimination on the grounds of sex, including unwanted physical, verbal, or non-verbal conduct of a sexual nature with the effect of creating an intimidating, hostile, and degrading environment that insults the dignity of women and men at work.

#### BUILDING A GOOD PUBLIC IMAGE OF THE COMPANY

Good manners and proper workplace etiquette show respect towards the company, co-workers, and business partners. Our attire and manners help build the image of the company. Let's adjust our clothing style to our tasks and business opportunities. When performing work in the workplace or talking on behalf of the company, we represent the company; that's why our performance, views, and manners count.

## 3. EMPLOYEE DEVELOPMENT

#### LONG-TERM RECRUITMENT STRATEGY

In compliance with the NEK organisation and foreseeable requirements, we provide a long-term recruitment plan, timely recruitment, and systematic development of newcomers. We pay special attention to developing competencies for vital job titles in the light of an in-depth understanding of technological processes and improving the work quality and performance of employees. Recruitment is premeditated based on the requirements of work processes and with due regard to the target number of employees pursuant to the approved human resource strategy.

#### TRANSFER OF KNOWLEDGE AND SKILLS

Our management is responsible for and ensures systematic transfer and documentation of knowledge, emphasizing the skills and contents not covered in operating documents. They provide adult, technological, and process knowledge and necessary means for training to mentors and training staff.

#### SYSTEMATIC APPROACH TO TRAINING

We are aware that a systematic approach to training contributes to the success of achieving organisation goals. Professional and competent individuals are the precondition for efficient, quality, and safe work processes, which lead to safe and stable plant operation. Outside educational institutions provide specialised training. Management supports training programs, co-shapes, and takes part in them as well as reinforces work standards and safety culture.



#### EMPLOYEE DEVELOPMENT DIALOGUE

Managers conduct employee development dialogues with employees as a form of effective direct communication between managers and colleagues, systematically and consistently monitoring and coaching colleagues, their development potential, and work performance. With an effective and equal dialogue that values the past, plans the future, and connects everyone's work into a successful whole, they create a motivating work environment, well-being, and conditions for the optimal development of employees and, thus, also the company.

## 4. OCCUPATIONAL SAFETY AND HEALTH

#### ZERO OCCUPATIONAL INJURIES AND ILLNESSES

Our goal is that every employee works in a safe and healthy workplace. Believing that injuries at work and occupational illnesses can be prevented, we act in a preventive manner to improve employee awareness, work practices, and knowledge. We are attentive to working conditions and always take safety measures to avoid risk. Leaders also introduce necessary measures for the health and safety of our workers. We work safely and in compliance with contemporary standards and procedures. And we assure equal working conditions to contractors.

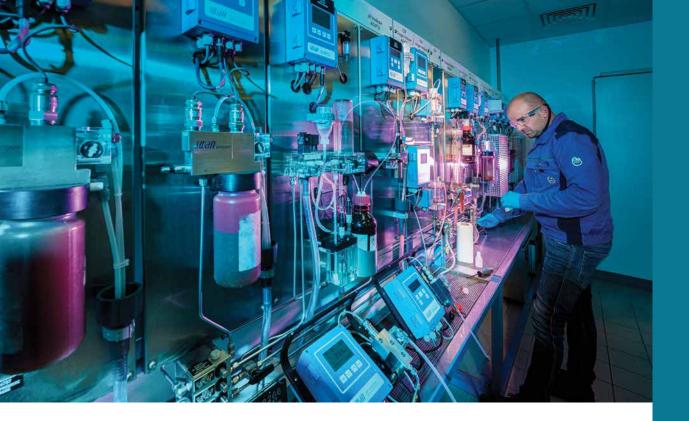
#### PREVENTIVE HEALTH MEASURES

To preserve health, physical, and psychological well-being and prevent psychosocial risks, we take care of a healthy and safe workplace under all circumstances (during plant operation, outages, emergencies; pandemic and epidemic diseases, and other natural disasters), encourage good relationships, assure quality healthcare of employees, and support them to maintain a healthy lifestyle by taking special preventive measures.

#### DRUG-FREE WORKPLACE

Taking, distributing, selling, or possessing drugs, alcohol, or other controlled substances within NEK is prohibited. Access to NEK under the influence of alcohol or drugs is forbidden. Full compliance with the restrictions in this area is monitored by periodic medical examinations, safety vetting, and identification testing. Any illegal substance abuse will result in a formal disciplinary proceeding.

28



#### MEDICAL TREATMENT

Every employee to whom a doctor prescribes medicine for health reasons must consult his doctor on the effects of such medicine on his capacity. If any adverse effects exist, the employee shall inform his superior about them.

#### WORKPLACE HEALTH PROMOTION (WHP)

The Workplace Health Promotion program aims to improve lifestyle and health. Recreation, holiday homes, and active health promotion are provided for the NEK employees.

## 5. BUSINESS ETHICS

### LEGALITY OF WORK

The success and reputation of NEK are built on the legality of work. We consistently comply with all regulations and regulatory restrictions on our field of work, on-site programs, and administrative and operating procedures. Every employee must familiarise himself with the laws and on-site procedures within his work scope.

### **BUSINESS GIFTS**

We refuse to conclude business deals in a morally controversial manner. We don't tolerate bribery and neither accept nor offer gifts that exceed normal business customs. Money, travel arrangements, and services will be considered unacceptable. If you are in doubt whether the offered gift is allowed or not, consult the appropriate department.

#### CONFLICT OF INTERESTS

At work, we should not prioritize our interests over the interests of NEK. We must avoid any activity, interest, or investment that could affect our best judgment or work obligations in the interest of NEK. Neither we nor our family members are allowed to

- act as a supplier for NEK, represent a supplier in business with NEK, or be a member of its management board;
- have a financial interest in organisations or companies NEK conducts business with in case they result in a conflict of interest;
- use NEK resources, including devices, computers, phones, tools, etc., for personal needs.

#### ANTI-CORRUPTION CLAUSE

NEK uses the following anti-corruption clause in its contracts:

"Contracting parties shall not give, promise, offer or receive any gift or payment either in cash or in any item of value, directly or indirectly to each other, through any worker, officer, or another employee for bribery, thus abusing their position and asserting influence on others' decision-making. In the event of breaching or attempting to breach the anticorruption clause, the concluded or valid contract is null and void; if the contract has not been valid yet, it is deemed not to have been concluded."

Corruption is considered when we, as a purchaser, negotiators, signatories, or responsible work performers, either request or accept gifts and other benefits from a contracting authority.

### DONATIONS

At NEK, we act responsibly toward the wider society. Our strength lies in our honesty, transparency, mutual help, understanding, and trust. We are especially attentive towards the local area. Donor funds are allocated primarily for humanitarian purposes and activities that improve the quality of life of the wider society.



## 6. CORPORATE RESOURCE MANAGEMENT

#### INTELLECTUAL PROPERTY

NEK uses proprietary information and professional expertise for business purposes only and the exchange of information and experts in professional organisations, associations, and international missions and safety committees. Scientific, educational, and technical presentations such as drawings, sketches, work processes, expert opinions, etc. are copyright protected.

#### FINANCIAL RESOURCES

Ensuring competition in the NEK's electricity generation on the electricity market is one of our strategic goals which ensures longterm perspective. Within their jurisdiction, employees strive for permanent rationalisation of production, efficient equipment and systems, increase in personal productivity, and justification of orders and investments.

#### MATERIAL AND CAPITAL ASSETS

NEK employees must handle the company property responsibly with the principles of economy and adopt appropriate measures to protect NEK's property against damage, loss, misuse, or theft.

#### INFORMATION TECHNOLOGY (IT)

IT is only used for legitimate business purposes. IT capacities and tools such as electronic mail, internet, mobile phones, laptops, printers, and copying machines are not utilised for personal gain or use. Authorised persons shall regularly make backup copies of computerised data. As the users of IT, we comply with the following adequately protect computer passwords for access to databases,

- applications and other INFO services;
- only use the software we are authorised for;
- only run the software related to work;
- don't install or upgrade a new software unless authorised to do so;
- don't browse banned and potentially harmful websites related to gambling, drugs, terrorism, porno, religious, and other intolerance, etc.:
- don't browse workstation contents of other users; such browsing, about which the user is notified, is only allowed to authorised persons and superiors;
- don't relocate PCs and peripheral equipment without the knowledge of authorised persons.

### **ARTIFICIAL INTELLIGENCE (AI)**

We know that AI is an excellent opportunity to optimize work processes, but in addition to the positive aspects of its use, we must also be aware of the risks it brings. We use AI tools at work thoughtfully and prudently per legislation, ethical principles, and the company's safety culture. At the international, European, and national levels, we monitor the development of the legal framework in AI.



## 7. ENVIRONMENTAL PROTECTION

#### COMPLYING WITH ENVIRONMENTAL REGULATIONS

NEK employees act responsibly and foster an attitude of respect for the natural environment. During the plant operation, we protect the environment and restrict releases and adverse health effects. We realise our environmental concern through strict compliance with regulatory restrictions and contemporary standards.

## 8. INFORMATION PROTECTION

#### INFORMATION PROPERTY PROTECTION

Information owned by NEK is an important acquisition for NEK. We handle hard copies and digital information with care and protect them from loss and theft. Important information is as follows: technical documentation, operating records, security plan, defence plan, nuclear safety mission reports, tenders, contracts with suppliers, business documentation, and databases.

#### **RESPONSIBLE INFORMATION HANDLING**

We are aware of the risk of uncontrolled distribution of the NEK's information. We consider the confidentiality flags of individual documents. We use information technology systems by the instructions of Business Informatics. With this, we prevent and disable unauthorized users from accessing data or information resources and their theft.

#### PERSONAL DATA PROTECTION

We understand personal data protection as the protection of human personality. We handle personal data responsibly and carefully per regulations and on-site acts. To protect personal data, we have taken appropriate measures.



## 9. PUBLIC RELATIONS

### **INFORMATION CREDIBILITY**

Communication skills are an important component of our work. Our operating and business activities are transparent for employees, nuclear professionals, and the general public. We provide information to the different public immediately when available in a systematic and trustworthy manner through our authorised professionals according to internal business rules.

Employees are aware of the public interest in all aspects of the plant operation owing to the nature of nuclear technology. We know that our positive actions are a step toward maintaining and upgrading the needed public trust, therefore our ethical behaviour will reinforce the company's positive reputation; we should avoid making comments that we are not authorised to make.

#### **INFORMATION SENSITIVITY**

NEK is the only nuclear power plant in Slovenia; the plant therefore plays a role in an exposed political and delicate media sphere of the global industry – nuclear energy. Special features of nuclear energy, such as nuclear safety, exposure to ionising radiation, and radioactive waste disposal, always catch the public's attention. We face the challenge of effectively forwarding information on the benefits of nuclear energy, such as the stability of the electrical energy supply, economic efficiency, sustainable availability, environmental benefits, local developments, etc. Our information is immediately available locally, nationally, and internationally. We act on social networks per agreed guidelines.

#### PROACTIVE COMMUNICATION

We are aware of the importance of proactive communication for public acceptance and respect. We inform the public in a proactive and trustworthy manner, based on facts, timely, and in their language. In addition to operating events, we inform about the positive aspects of NEK operation and nuclear power in a broader sense. Our target audience is the internal public, media professionals, local communities, political parties, educational institutions, professional organisations, associations, etc. We organise meetings for important target groups. The PR Department communicates with the news media representatives and responds to their questions as well as questions of other interested parties. Thus, we reduce the likelihood of rumours and false information. We take part in youth educational programs in the field of energy awareness.

#### INTERNAL COMMUNICATION

We offer effective onsite information flow, such as Goals and *Commitments of NEK* and departmental implementation plans. The essential way of communication is face-to-face communication based on the stated values and supported by modern communication tools. Being aware of the role of employees in the "outside" world in building the company's image, we inform them of the operating results and interesting information which are submitted to the general public.

#### INFORMAL COMMUNICATION

We should be aware that we, the employees, are ambassadors of our company. In informal information exchange, we will also talk respectfully about the plant in a manner that maintains and builds our image. Therefore, we will think before we speak and remain objective because our behaviour and work performance directly impact the perception of the general public. We are especially conservative on personal social network profiles.

## **10. SECURITY OF NEK**

A threat of potentially harmful acts by individuals or groups poses a major risk to commercial nuclear energy facilities. The Security Department covers a wide range of prescribed measures and tasks to ensure the physical security of NEK, focusing on the use of modern equipment and high-skilled and professional employees. We, the security officers, are professionally friendly; however, we refrain from unnecessary conversations with employees and ourselves when on duty because it could disturb our concentration and affect the quality of our work. Either at NEK or outside NEK, every NEK employee is attentive to deviant behaviour that could signal a potential for violence. We report any such deviations to the NEK's Security.

## **11. RELATIONSHIP WITH BUSINESS** PARTNERS

We build a respectful and constructive partnership with suppliers and service providers, considering legal restrictions. At NEK, we guarantee equal participation of suppliers and service providers from Slovenia and Croatia that meet the conditions of qualified operators in nuclear power plants. We select them based on the defined conditions and criteria. We expect suppliers and service providers to comply with the General Terms and Conditions of NEK for specific areas and with the QA requirements. Based on the QA plan, we verify their qualification.

#### ANTICIPATED CONDUCT OF BUSINESS PARTNERS

At NEK, we expect our business partners to comply with the principles of ethical and moral behaviour. They shall act per the core and personal values as well as the principles of conduct and action per this Code and adopt at least equivalent standards and operate under them and the applicable law in force.

They are obliged to acquaint their workers, suppliers, and service providers with the expectations of NEK.

#### APPROPRIATE WORKING CONDITIONS

Service providers shall ensure adequate health care, working conditions, and remuneration to their workers.

Service providers shall ensure the safety of their employees, periodic training, and adequate work equipment in compliance with the law.

#### ENVIRONMENT

They shall apply the environmental standards in force and the principles of sustainable environmental management and protection.

#### **BUSINESS INTEGRITY**

Business partners shall comply with the law and fair competition standards. They shall not conclude agreements and deals that would affect price or conditions or restrict competition.

They shall object to corruption and economic crime, including the payment of reliefs and privileges.

They shall abide by the law on protecting personal data and protecting the business secret of NEK.

They shall ensure the integrity as well as proper and economical use of the NEK's property to which they have access or have an impact.

## 12. SUSTAINABILITY

We act sustainably in the realization of our mission. With the safe and stable operation of the nuclear power plant and the reliable production of electrical energy, we contribute significantly to mitigating climate change and the well-being of society. By reducing NEK's carbon footprint, we demonstrate a responsible attitude towards the natural environment. Striving for good relations, we encourage open communication with the local community and all other stakeholders. With systematic training and long-term employment planning, we ensure a safe and stimulating work environment. We have established a succession policy for the management board and management. We check the qualifications of business partners and expect them to adhere to the principles of ethical and moral conduct. We provide contractors with safe working conditions. In doing business, we are committed to preventing corruption risks and conflicts of interest. With a high standard of corporate management, we strengthen our reputation at home and abroad.