

Appendix No. _____

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.

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