

مؤسسة الإمارات للطاقة النووية
Emirates Nuclear Energy Corporation



شركة براكة الأولى ش.م.خ
Barakah One Company PJSC



شركة نواة للطاقة
Nawah Energy Company



Enterprise Code of Conduct



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MESSAGE FROM THE LEADERS



Mohamed Al Hammadi
Managing Director and CEO
Emirates Nuclear Energy
Corporation



Nasser Al Nasser
CEO
Barakah One Company



Ali Al Hammadi
CEO
Nawah Energy Company

The Barakah Nuclear Energy Plant is strategically important to the future of the United Arab Emirates. It is already supplying clean and reliable electricity to the nation 24/7, sustainably powering our communities and leading the largest decarbonization effort in the Arab World.

We must recognize the significance and importance of the Barakah Plant and the extraordinary responsibilities this brings. As part of the UAE Peaceful Nuclear Energy Program, we must live up to the expectations of the UAE leadership and the people of the nation.

Our mission is to ensure a safe and sustainable peaceful nuclear energy program to achieve our vision of powering the growth of the UAE. This mandate can only be fulfilled if we meet the expectations placed on us, our colleagues, our partners and our shareholders.

We take these commitments seriously and must work diligently every day to act consistently with these promises and in line with our values.

To this end, we have adopted the Enterprise Code of General Business Principles and Ethics ("Code of Conduct" or the "Code"). This provides us with a set of principles and guidelines that will enable us all to ensure we do the right thing always while we conduct our business and play a crucial role in the safe, efficient, and quality driven delivery of the UAE Peaceful Nuclear Energy Program.

A. THE FOUNDATION

1. OUR VALUES

Our mission and vision are guided by our commitment to the six corporate ATSITE values of accountability, teamwork, safety, integrity, trust, and excellence.

Being in the nuclear industry, safety is one of our core values. Safety is the responsibility of every employee of the Enterprise and we are committed to set safety as a priority in everything we do.

Our Healthy Safety Culture

Our traits of a healthy nuclear safety culture define the values and behaviors of leaders and individuals. As a pioneer in nuclear power production in the region, we would always emphasize safety over commercial gain or any other competing goal to protect our people and the environment.

Our healthy safety culture elements include nuclear safety, radiological safety, industrial safety, environmental safety and security.

For more information, refer to Section 6, Health and safety.



Accountability



Teamwork



Safety



Integrity



Trust



Excellence

A. THE FOUNDATION

2. OUR CODE

Scope and Purpose

The Enterprise Code of General Business Principles and Ethics (the “Code”) provides guidance on the basic principles, standards, and behaviors necessary to uphold our values and achieve our objectives with the highest level of ethics, integrity, and corporate responsibility. It is our actions and not the words in this Code that matter most. This document outlines our legal and ethical responsibilities that enable us to do the right thing, and make the right decisions, on behalf of the Enterprise every day.

Applicability

The Code applies to all Enterprise Employees, including ENEC, Nawah and Barakah One Company's Boards of Directors, members of all Board sub-committees, and all others who work for or represent the Enterprise, either directly or indirectly (the “Employee”). This includes but is not limited to direct hires, consultants, contractors, secondees, and trainees. This Code applies to the workplace including all remote locations where Enterprise business is conducted, or Enterprise Assets exist.

Ethical Decision Making

The Code addresses a wide range of business, legal and ethical matters, however, it cannot anticipate every issue that may arise. As a result, honesty, common sense, and good judgement provide the best general guidelines for appropriate behavior. Everyone is encouraged to speak up and consider how outsiders may view any particular action (if revealed), especially those of a legal or ethical nature, and whether it would have the potential to harm the Enterprise.

Disciplinary Actions

Complying to the provisions of this Code is of high importance for the Enterprise. Any breach to the Code, regardless of title or position, may result in disciplinary action or legal proceedings.

The responsibility of ensuring adherence to this Code resides with the Enterprise Business Ethics and Compliance Department (the “Compliance Office”).

For any clarifications regarding the Code, please contact the Compliance Office at compliance@nawah.ae.

A. THE FOUNDATION

3. OUR CONDUCT

All Enterprise Employees and representatives are required to conduct business in line with the highest standards of personal and professional integrity in all aspects of their activities, and in compliance with all applicable laws, regulations, and commitments of the Enterprise.

Our Enterprise Conduct

We will conduct our business fairly, impartially, and in full compliance with all applicable laws and regulations.

We are committed to provide a positive, inclusive, and diverse workplace where Employees are valued and respected.

We encourage reporting of unsafe, unethical, or illegal practices, incidents and near misses, and use this information for continual improvement.

We place great focus on the Health, Safety, Environment, Security & Sustainability and integrate these considerations into business plans to ensure that Board-level decisions are made with appropriate consideration of relevant risks.

Our Employees' Conduct

Employees are expected to be responsible members of the Enterprise and be familiar with the contents of the Code as well as the relevant policies, processes and procedures.

Employees are required to act with integrity, respect and team spirit and speak up if they notice violations to the Code.

Our Managers' Conduct

Line Managers, due to the nature of their position, have additional responsibilities to lead by example and demonstrate the highest ethical and quality standards in their work. This is cascaded down to every member of their team. The Enterprise's LEAD behaviors explain that Managers are expected to Lead, Enable, Align and Direct (LEAD) their team members towards the values of the Enterprise.

Line managers are required to encourage team members to adopt a questioning attitude and speak up without fear of retaliation; and reinforce ethical conduct of all members of the team.

A. THE FOUNDATION

Good to know

Protected Disclosure: A good faith disclosure of Reportable Matters made through Authorized Channels by an Employee, which entitles protection to the person, from any detrimental treatment by the Enterprise or any Enterprise Employee.

4. OUR PROCESS

Speaking-up

There are several channels that the Employees may utilize to report anonymously any suspected Code violation. For information on the Reporting Channels , refer to Section - G on “ Enterprise Reporting Channels”.

When deciding which channel to use, consider the nature of the concern, the individuals involved, and the reporter's comfort level.

Employees are encouraged to reach out to the direct manager first. However, if for any reason the Employee is not comfortable with such a communication, the Compliance Office can be approached in person or via email at Compliance@nawah.ae.

Reporting In Good Faith

The Enterprise is committed to establish and maintain a work environment where Employees are encouraged to report genuine concerns regarding Fraud or Misconduct, without fear of retaliation. It is important that anyone making a Protected Disclosure, acts in good faith and has reasonable grounds for believing the information disclosed indicates Fraud or Misconduct. Employees shall not knowingly, or with total disregard for the truth, give false information or knowingly make a false report.

Non-Retaliation

The Enterprise has a zero-tolerance policy towards retaliation. Employees shall not retaliate against another Employee who, in good faith, asks a question, participates in an investigation, or reports a genuine concern. Employees who have a concern about Retaliation should report to the relevant reporting channel as in Section F.

Concern Management

A fair, impartial, thorough, and timely review will be conducted of all reported concerns in line with the established procedures. Confidentiality of Protected Disclosures and investigatory records is an essential component of the review and investigation process and will be fully respected. Every effort will be made to ensure that information obtained during a review is disseminated only on a “need to know” basis or as required by law.

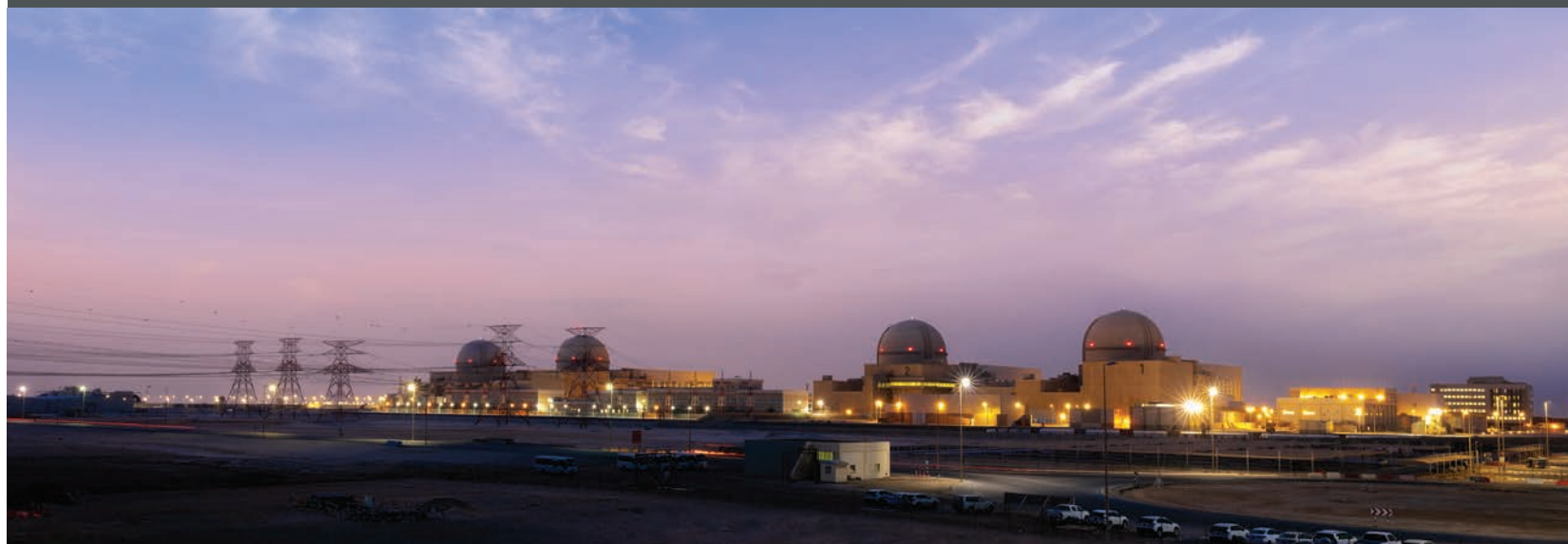
A. THE FOUNDATION

5. CERTIFICATE OF COMPLIANCE

It is the responsibility of all Enterprise Employees to read, understand and comply with the Code.

Every Employee is obliged to complete the annual reading requirement of the Code on the Enterprise Learning Management platform (TAQA). All Employees must complete the relevant declarations upon joining the Enterprise and on an annual basis.

Code compliance is a condition of service for the Board of Directors, a condition of employment for the Employees, and applies to conduct in the workplace.





INTEGRITY AS WE WORK TOGETHER

Our Pledge

“The human being is the core of any civilization; thus, it is necessary to focus on people because they are the center of gravity for any real and sustainable progress”

- Sheikh Zayed Bin Sultan Al Nahyan.

We are committed to achieving a sense of pride and passion for what our Employees do, and to maintain a diverse and inclusive work environment that value Employees' contributions and provide them with opportunities to reach their full career potential.

We are committed to maintaining a safe workplace by adhering with high standards of health and safety; maintaining a drug and alcohol-free work environment; and encourage reporting of any concerns without fear of Retaliation.

B. INTEGRITY AS WE WORK TOGETHER

The Enterprise is committed to maintaining the highest standards of health and safety.

6. HEALTH AND SAFETY

Our Standard

We are determined to promote the highest health and safety standards and an effective nuclear safety culture at the Enterprise.

We maintain the highest standards of nuclear safety in the design, operation, and maintenance of our nuclear power plants. We adopt a conservative, risk-based approach to decision making, and maintain a comprehensive Employee safety program to ensure a safe work environment.

We are also committed to training all our Employees on our established Human Performance Tools to set discrete behaviors to prevent errors before they cause harm to Employees, plant, and the environment

Employee Responsibility

As an Employee, I will:

Question, stop work or correct any unsafe act or condition in the workplace.

Be accountable for my own health and safety and watch out for the safety of others in my area of work.

Immediately report to my line manager any injury, illness, accident, or unsafe work condition which occurs or exists in the workplace, and any concerns relating to the safety of the design, operation, and maintenance of our nuclear assets.

Follow all safety controls that may compromise the safety of the plant and the people around.

Seeking Help

If you are unsure of a particular situation regarding health and safety, contact the relevant Departments:

- Occupational Health and Safety
- Nuclear Performance Improvement
- Nuclear Oversight - Employee Concerns Program

B. INTEGRITY AS WE WORK TOGETHER

We maintain a safe, drug-free and alcohol-free workplace to support our commitment to a safe and healthy work environment.

7. SUBSTANCE-FREE WORKPLACE

Our Standard

We always place safety first, last, and always. To work safely, reliably and effectively, we need to think clearly, and pay more attention on the performance of all Employees. We are committed to maintain a safe and healthy work environment that is free from alcohol or substance abuse. Therefore, we have developed clear policies to prevent the use, possession, distribution of illegal drugs or alcohol.

Employee Responsibility

As an Employee, I will:

Be committed to a drug-free and alcohol-free workplace.

Not possess, use, sell or distribute illegal drugs or alcohol.

Report to work fit for duty to perform my duties safely.

Report immediately if I observe anyone who may be under the influence of alcohol and drugs while at work.

Cooperate with any drug or alcohol screening activities when notified.

Report any prescribed medication that can affect my behavior or judgment to my line manager in a timely manner.

Seeking Help

If you are unsure of a particular situation related to drugs and alcohol, contact SitePersonnelSecurity@nawah.ae.



B.

INTEGRITY AS WE WORK TOGETHER

We are committed to providing an environment where Employees are encouraged to raise concerns without fear of Retaliation. The nuclear industry refers to such an environment as a Safety Conscious Work Environment (SCWE), which is an important attribute of a healthy Nuclear Safety Culture.

Good to know

Harassment - offensive behavior that demeans, humiliates or embarrasses an individual and it can be verbal or nonverbal.

Intimidation - A verbal or physical act that induces fear using threats, violence, or blackmail against an Employee to act in a certain way.

Retaliation - an adverse action against an Employee who is engaged in a protected activity. This includes demotion, decrease in pay, discipline, firing or job reassignment, selection, hiring, placement, compensation, benefits, transfer, promotion, training, termination, and disciplinary action

Discrimination - is when a specific Employee is treated unfavorably because of a personal trait such as race, origin, color, gender, religion, disability, age, marital status or even pregnancy.

8. SAFETY CONSCIOUS WORK ENVIRONMENT

Our Standard

We maintain a healthy work environment where speaking up is encouraged, and provide mechanisms for raising, investigating and resolving safety concerns.

We set the expectation that Harassment, Intimidation, Retaliation and Discrimination (HIRD) of any Employee will not be tolerated and commit to take firm action against such behaviours.

We understand that Harassment can take several forms including physical, psychological, or emotional harassment. We also condemn any inappropriate behavior related to sexual harassment, such as:

- Making unwelcome exchange of verbal and written statements of a sexual nature.
- Intimate staring or watching.
- Sharing, displaying, or exposing obscene images.
- Soliciting intimate relationships or invitations on dates.
- Sexual physical actions or unnecessary familiarity, such as deliberately brushing up against a person, touching, standing in proximity, hugging, and any sort of romantic or sexual acts.

Employee Responsibility

As an Employee, I will:

Make all employment and other work-related decisions without any Discrimination to an individual's personal traits and other aspects such as sex, ethnicity, religion, age, caste, creed, or color.

Treat my fellow Employees with dignity and respect and with the highest degree of professionalism.

Use fair and objective methods to resolve conflict and differing professional opinions.

Support individual rights and responsibilities to raise safety concerns.

Actively engage in maintaining a healthy Safety Conscious Work Environment (SCWE).

Promptly report any act of HIRD that I might experience or witness.

Not be rude, abusive, or display an insulting behavior, or engage in any acts of violence, whether verbal or non-verbal, direct, or indirect, against anyone in the workplace.

Not engage in any kind of HIRD against anyone in the workplace.

Seeking Help

If you are unsure of a particular situation regarding the above, contact the Employee Concerns Program at ECP@nawah.ae or ECP@enec.ae.



INTEGRITY AS WE PROTECT THE ENTERPRISE

Our Pledge

We are committed to sustain an environment that ensures the highest standards of integrity and trust, free from any acts of Fraud or Misconduct.

We are also committed to safeguarding all our Enterprise Assets.

We will implement proper governance and internal controls to ensure that our Records are managed and secured appropriately.

C. INTEGRITY AS WE PROTECT THE ENTERPRISE

All types of Fraud, Corruption and Bribery, including Money Laundering, will not be tolerated.

Good to know

Fraud - a knowing misrepresentation of the truth, or concealment of a material fact, to induce another to act to his/her detriment. Fraud includes asset misappropriation, and financial misstatement and Corruption.

Misconduct - Employee behavior or action that is considered to be negligent or irregular to such an extent that a disciplinary response from management is required. Such action may include, but is not limited to, theft, dishonesty, and violence at work, intoxication through alcohol and/or drugs, sabotage, deliberate wrongdoing or behavior that does not conform to prevailing standards or laws.

Money Laundering - the illegal process of making large amounts of money generated by a criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source.

Bribery - The offer, promise, or payment of anything of value given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage.

Corruption - The misuse of entrusted power for personal or private gain.

9. COMBATTING FRAUD, CORRUPTION & BRIBERY

Our Standard

We regard that Fraud, including Corruption, asset misappropriation, and financial misstatement schemes are unethical and illegal. Fraudulent behavior violates our Enterprise values and is internationally considered a crime that is punishable by law.

We are committed to conduct our business in compliance with all applicable local, federal, and international legislation, related to anti-Bribery, Corruption, and anti-Money Laundering regulations. We also comply with anti-Bribery or Corruption laws of other countries where we maintain business relationship.

Our policy prohibits corrupt payments and activities while conducting business, whether involving private sectors or government agencies or Public Officials. This includes Bribery and kickbacks of any kind.

We also follow a thorough due diligence process to ensure that we do our business with reputable suppliers and individuals, who practice highest standards of ethics and integrity and are not part of any sanction lists.

Employee Responsibility

As an Employee, I will:

Follow all applicable local and international laws and Enterprise policies and procedures on matters regarding Fraud, Bribery, and Corruption including Business Courtesies and Conflicts of Interest.

Not get involved in any form of Fraud that could harm the Enterprise.

Report any act of Fraud and Misconduct or any activity that appears to be inappropriate, unethical, illegal, or fraudulent.

Seeking Help

If you are unsure of a particular situation regarding Fraud, Misconduct, or Money Laundering, contact the Compliance Office.

To Report any Fraud and Misconduct concerns, please reach out to Audit & Investigation team through following reporting channels:

- 1. Email:** ENEC: ireport@enec.gov.ae or Nawah: ireport@nawah.ae
- 2. Manual:** Anti-Fraud and Misconduct Reporting form IAD-FRM-101-01.
- 3. The Web** Internet: "Ethics Point" on <https://reporting.enec.gov.ae>
Intranet: (OTOG): ENET >E-services > Anti-FraudandMisconduct
- 4. Call:** International Toll-Free Hotline:
UAE: 800 032 0939
Korea: 00308-132-529
USA: 888-579-1647
For other countries: +1 888 579 1647

Alternatively, you may call any of the Audit & Investigation team members during office hours.

C. INTEGRITY AS WE PROTECT THE ENTERPRISE

Any potential, perceived or actual Conflict of Interest situation might lead to Fraud, Bribery and Corruption if not identified, disclosed and managed appropriately.

Good to know

Conflict of Interest - Situation where there is a proposed transaction of the Enterprise in which an Employee or a Related Person has any actual or potential personal involvement, interest or relationship, that may affect, or may be perceived as affecting the Employees' ability to perform duties objectively or compromising the Employee's duty to act wholly in the best interests of the Enterprise.

10. MANAGING CONFLICT OF INTEREST

Our Standard

A Conflict of Interest situation arises whenever a situation affects or is perceived to be affecting the Employee's ability to perform duties objectively or compromising the Employee's duty to act wholly in the best interests of the Enterprise.

We are committed to implementing necessary controls and effectively managing any type of Conflict of Interest situation that may arise across the Enterprise. We respect the privacy of all our Employees and their right to take part in legitimate financial, and other activities outside of work. However, these activities must be lawful and free of any conflict with their work responsibilities and shall not conflict with the goals of the Enterprise.

We provide guidance through necessary policies and procedures, and educate all Employees on how to identify, declare and manage any Conflict of Interest that might arise at their work.

Employee Responsibility

As an Employee, I will:

Be aware of the situations that may constitute a Conflict of Interest including, but not limited to:

- Having a Related Person in the Enterprise;

- Having Related Persons who work for suppliers;
- Making use of the knowledge of non-public or other confidential information to my personal gain;
- Serving as a consultant or director of any entity having business with the Enterprise.

Declare any potential or perceived Conflict of Interest promptly to my line manager and the Enterprise Business Ethics and Compliance Office.

Avoid all types of Conflict of Interest situations and recuse myself from any related business decisions.

Not allow my personal interests to influence my business decisions and always act with the best interest of the Enterprise.

Seeking Help

If you are unsure of a particular situation regarding Conflict of Interest, contact your Line Manager as your first contact. Then, seek additional support from Enterprise Business Ethics and Compliance Office.

C. INTEGRITY AS WE PROTECT THE ENTERPRISE

Business Courtesies might promote good rapport with any third-party including suppliers, however there are various rules governing such actions which need to be followed.

Good to know

Business Courtesies - anything of value from persons or companies with whom the Enterprise maintains or may establish a business relationship and for which fair market value is not paid by the recipient.

11. MANAGING BUSINESS COURTESIES

Our Standard

Unchecked acts of Business Courtesies exchange might lead to bias in the mind of the decision maker, preventing the person to do the right thing, that may possibly impact our reputation, safety, and could result in financial loss.

We provide adequate controls to manage Business Courtesies to prevent Fraud, Bribery and Corruption and provide appropriate guidance to do the right thing in such cases.

In general, Business Courtesies must not exceed the value of AED 500 cumulative from the same source in a year; must not be cash or usable as cash and should be legal in the jurisdiction and permitted in the organization of the giver and the receiver.

Employee Responsibility

As an Employee, I will:

Not offer, give, receive, or solicit anything of value, or act as an agent to influence or reward an official act or a business decision.

Always be cautious and follow the standards when offering or accepting gifts.

Not accept any Business Courtesies exceeding the threshold.

Declare all Business Courtesies that are offered, accepted, and provided on behalf of the Enterprise, and ensure that they are reasonable and appropriate for the occasion.

Seeking Help

If you are unsure of a particular situation regarding Business Courtesies, contact your Line Manager and seek additional support from Enterprise Business Ethics and Compliance Office.



C. INTEGRITY AS WE PROTECT THE ENTERPRISE

We are committed to be good caretakers of the Enterprise Assets and use them in the best interest of the Enterprise.

Good to know

Assets - Anything of value that the Enterprise owns, creates, or benefits from. The scope of the assets includes all departments, locations, and facilities and consists of Information Assets, Human Capital Assets and Financial Assets.

12. SAFEGUARDING OUR ASSETS

Our Standard

Our Enterprise Assets - including human capital, plant and facilities, information, and anything that are considered as financial instruments - are essential for achieving the mission and vision of the Enterprise effectively and efficiently. Hence, it is important for us to safeguard all Enterprise Assets at all times.

We implement appropriate technological and administrative controls to prevent leakage of confidential information.

We reserve the right to access data that have been shared or transmitted through Enterprise devices or networks and systems. There is no expectation of privacy when using Enterprise systems.

The Enterprise shall own all intellectual property whether patentable or registerable under copyright or similar laws, that an Employee may solely or jointly develop or practice, during the course of their employment.

Employee Responsibility

As an Employee, I will:

Handle the Enterprise Assets wisely, efficiently and with care.

Protect the Enterprise Assets against loss, theft, damage, and misuse.

Prevent unauthorized individuals to acquire Enterprise confidential information.

Use Enterprise Assets only for the Enterprise business purposes in accordance with the applicable policies and procedures.

Promptly report any abuse or misuse of Enterprise Assets.

Protect the Enterprise confidential information including the intellectual property of the Enterprise and others and comply with all relevant laws or agreements.

Not provide Enterprise Assets to any external party unless I have proper authorization to do so.

Not discuss confidential Enterprise business with family and friends or discuss such information in public areas, even after I leave the Enterprise.

Not use Enterprise Assets for illegal or unethical activities such as viewing or sending content that is abusive, offensive, obscene, violent, or discriminatory.

Seeking Help

If you are unsure of a particular situation regarding Enterprise Assets, contact the Compliance Office.

C. INTEGRITY AS WE PROTECT THE ENTERPRISE

We always maintain detailed, complete, and accurate Enterprise Records in a timely fashion.

Good to know

Records - any register, index, accounting record, agreement, memorandum, minute, or other document required by the Companies Acts to be kept by a company and any register kept by the Enterprise books, reports, or accounts.

13. MANAGING OUR RECORDS APPROPRIATELY

Our Standard

We maintain complete, accurate and current business and financial Records to facilitate strategic decision making and provide timely information to our shareholders, management, Regulators, and other relevant Stakeholders that rely on the integrity and accuracy of our Records. Maintaining accurate and transparent Records protect our reputation and promote organizational efficiency and safety.

We have implemented a series of internal controls, including policies, procedures and systems intended to ensure that Enterprise Records required for the conduct of our business, are in compliance with applicable laws and regulations, and are appropriately maintained and archived, and where obsolete documents are destroyed per set procedures.

We are also committed to preserving data privacy and information collected from all Stakeholders, including our Employees and will manage them per applicable laws and relevant Enterprise procedures.

Employee Responsibility

As an Employee, I will:

Keep detailed, accurate and complete books of all Records that reflect business transactions and related information in a timely fashion in my area of work.

Follow the delegation of authority and segregation of duties requirements of the Enterprise regarding creation, approval, and review of Enterprise Records.

Detect and report internal control deficiencies that might affect the ability of the Enterprise to record, store and maintain detailed, accurate and complete data.

Prevent and immediately report all requests to manipulate Enterprise Records, and any suspected activity regarding financial transactions, accounting, or auditing matters.

Not engage in any unauthorized activity to discard, destroy, conceal, misrepresent, or alter any Enterprise Record related to any transaction, event, or condition.

Seeking Help

If you are unsure of a particular situation regarding Enterprise Records, talk to your line manager or contact the Compliance Office.



INTEGRITY AND MAINTAINING TRUST WITH OUR STAKEHOLDERS

Our Pledge

At the Enterprise, we will conduct our business in compliance with all applicable UAE federal laws, Abu Dhabi Laws, international laws, regulations, agreements, commitments, standards, and codes of practice.

While dealing with suppliers locally or globally, we will ensure fair and healthy competition and that adequate controls are implemented to prevent Insider Trading activity. We will protect non-public inside information of all our Stakeholders and never use such information to gain an unfair advantage.

We will deal with our Stakeholders with respect and integrity, and promote trust by conducting business professionally, legally, and ethically.

D.

INTEGRITY AND MAINTAINING TRUST WITH OUR STAKEHOLDERS

We are a responsible corporate citizen and committed to adhere to all applicable Compliance Obligations.

Good to know

Compliance Obligations - All applicable Compliance requirements and commitments that must be complied with by the Enterprise.

Stakeholders - shareholders, Regulators, government agencies, international associates, academia, customers, employees, and suppliers.

14. MANAGING OUR COMPLIANCE OBLIGATIONS

Our Standard

The Enterprise is subject to numerous complex laws, rules and regulations, inter-company agreements, international agreements and commitments due to the highly regulated nature of the nuclear industry within which we operate. Breaches to any such obligations can harm the project, operations, financial stability and reputation of the Enterprise.

In view of the above, our policy requires compliance with all applicable Compliance Obligations. We are also committed to cooperate with government agencies and Regulators in all matters concerning our Compliance Obligations. For more information regarding government agencies and Regulators, refer to section 17 of this Code.

Employee Responsibility

As an Employee, I will:

Follow all applicable Compliance Obligations that are relevant to my work and seek guidance when there is no clarity on such obligations.

Be aware of the legal obligations related to the country where the work is performed, in case my work involves working outside UAE.

Proactively speak up if I suspect any potential violation to any of the Compliance Obligations related to my work.

Seeking Help

If you are unsure of a particular situation regarding Compliance Obligations, seek help from your Line Manager or contact the Compliance Office.



D.**INTEGRITY AND MAINTAINING TRUST
WITH OUR STAKEHOLDERS**

We promote and maintain the highest ethical standards and fair competition based on the principles of openness, fairness and equal opportunity that drives high performance, develops sustainable supplier relationships and creates value.

15. PROMOTING FAIR PURCHASING PRACTICES AND COMPETITION

Our Standard

Our suppliers are an essential part of the extended Enterprise, and we value their engagement with us to develop a long-term sustainable partnership while considering quality as the prime factor to ensure nuclear safety.

Our business and purchasing practices are aimed at promoting fair competition and professional competence among suppliers to support a competitive market. We also promote "In Country Value sourcing" to contribute positively to the economic and industrial development of the UAE, ensuring fair competition in the local markets.

We adhere to applicable local and international trade laws and nuclear regulations, which include the export control requirements of certain goods and services, or restrictions concerning direct or indirect dealings with select countries, entities, and individuals.

Furthermore, we are aware of the dangers of counterfeit, fraudulent and suspect items in the nuclear industry and will take utmost care in selecting our suppliers and implementing appropriate controls to maintain the quality of our procured services and products to ensure business continuity.

Suppliers are expected to maintain a high level of duty of care in conducting work for the Enterprise and to adhere to our Supplier Code of Conduct. It is mandatory for all our suppliers to comply with all legal and regulatory obligations in their country of origin, in transit, and in the UAE.

Employee Responsibility

As an Employee, I will:

Communicate with all suppliers professionally and fairly and act with integrity in all stages of the procurement process.

Keep nuclear safety as a top priority while selecting suppliers and ensure that the selection is based on their track record in ethical business practices, safety standards and quality of products and services.

Ensure that the suppliers that I deal with are following the Enterprise Supplier Code of Conduct.

Follow the applicable laws, Supply Chain policies and procedures of the Enterprise and the defined approval processes.

Promptly report any unfair and unethical behavior, operations, and activities of suppliers or those dealing with them.

Not engage in behaviors that manipulates the market, or negatively impact our suppliers.

Seeking Help

If you are unsure of a particular situation regarding fair competition, contact the Compliance Office.

D. INTEGRITY AND MAINTAINING TRUST WITH OUR STAKEHOLDERS

Good to know

Insider Trading means buying, holding, or selling investments/ securities based on confidential (non-public) information received or shared directly, as an employee, or indirectly, from or to colleagues, friends, family, or other third parties.

16. PREVENTING INSIDER TRADING

Our Standard

Not only is Insider Trading illegal, but we also prohibit it as each employee has a fiduciary duty to the Enterprise to use confidential information only for work, and to ensure the Enterprise image and trust our Stakeholders have in us is maintained.

Employee Responsibility

As an Employee,

I understand that I may acquire confidential information when working for the Enterprise and I will:

Follow all internal requirements when handling confidential information.

Not disclose or use confidential information or provide confidential information to others for my personal benefit or the personal benefit of others.

Seeking Help

If you are unsure whether a particular activity constitutes Insider Trading, please contact the Compliance Office.



D.**INTEGRITY AND MAINTAINING TRUST
WITH OUR STAKEHOLDERS**

We maintain transparency and act with integrity while dealing with the government agencies and Regulators.

Good to know

Public Officials - Government officials including employees, agents, representatives acting on behalf of the Government Agencies including Regulators.

Regulators- any federal or state governmental authority entrusted with the supervision or regulation of specific industry or activity in the Country.

**17. RELATIONSHIPS WITH GOVERNMENT
AGENCIES AND REGULATORS****Our Standard**

Our business is guided and regulated by federal and local government agencies and other international organizations and our interaction with them has a significant impact on our success, and reputation.

When dealing with government agencies and Regulators, we will always cooperate to fulfill our obligations and respond accurately, appropriately and in a timely manner to any inquiry or investigation.

We are committed to strictly comply with all applicable laws and regulations as we interact with Public Officials and adhere to the special rules that apply while dealing with them in matters such as exchange of Business Courtesies.

Employee Responsibility**As an Employee, I will:**

Understand the appropriate requirements when interacting with Public Officials, communicate with them courteously and professionally, and follow relevant laws, regulations and Enterprise policies and procedures.

Be accountable, prompt, accurate and complete in all my representations to government agencies and Regulators.

Accurately represent the business and financial condition of the Enterprise to the government agencies, Regulators and our shareholders as required.

Report promptly any violation that I observe in dealing with government agencies and Regulators including Public Officials.

Seeking Help

If you are unsure of a particular situation while dealing with Public officials, refer to section 9 of this Code or contact the Compliance Office.

A background image showing two workers in safety gear (hard hats, glasses, and vests) in an industrial setting, likely a nuclear power plant. The image is overlaid with a magenta/pink color gradient. The worker on the left is a man with a beard and glasses, wearing a white hard hat with a headlamp and a dark vest with 'LO' on it. The worker on the right is a woman wearing a white hard hat with a headlamp and a dark jacket. They are both looking towards the right. The background shows industrial equipment and pipes.

INTEGRITY IN CARING FOR OUR COMMUNITY

Our Pledge

We are leading the development of the UAE's Peaceful Nuclear Energy Program. Our commitment is to provide clean and sustainable energy to the UAE to support the country's sustainable social and economic goals.

We pledge to work towards developing the Barakah Nuclear Power Plant in accordance with the highest international standards of safety and reliability, while maintaining a high level of nuclear social responsibility. We also support our community and protect our planet by launching sustainable programs and activities inspired by the spirit of our Leaders in the UAE.

E. INTEGRITY IN CARING FOR OUR COMMUNITY

The Enterprise is committed to govern the business with a strong focus on nuclear operations that protects our people, plant and the environment, and acting in line with a culture of social responsibility.

Good to know

Corporate Governance - is the system of rules, practices, and processes by which a firm is directed and controlled.

18. FOCUS ON ENVIRONMENT, SOCIAL, AND GOVERNANCE (ESG)

Our Standard

We deliver safe, clean, efficient, and reliable electricity to the UAE while maximizing our economic impact, promoting sustainable development, reducing carbon emissions, and ensuring compliance with all environmental laws and regulations.

We also maintain a unique nuclear social responsibility commitment towards our community, neighbors and other Stakeholders including our Employees.

While we are aware of the positive contribution of nuclear energy to the advancement of our community and the economy, we are also mindful of the general acceptance of nuclear plants by the wider public and the risks involved in using the technology. We are committed to the highest international standards of safety, security and quality. We seek to maintain and uphold the trust of society and ensure safe and reliable operations at Barakah.

We are also committed to maintaining a robust Corporate Governance framework for effective decision making that is required for nuclear safety, security and reliability, resulting in efficient management of Enterprise resources for equitable and sustainable development. We provide direction and oversight over our activities by adhering to the Federal Laws of the UAE on Corporate Governance and the essential attributes of the World Association of Nuclear Operators (WANO) Governance Principles.

Employee Responsibility

As an Employee, I will:

Be sensitive to environmental risks in our business and especially while performing my daily work.

Report any environmental concerns, hazards, or accidents as set out in our reporting guidelines immediately.

Follow the Enterprise standards and guidelines on Health, Safety and Environment that contribute to the safety of all Employees and the wellbeing of the community, protect the environment and promote sustainability.

Understand and fulfill my role in maintaining the highest standards of nuclear safety culture.

Seeking Help

If you are unsure of a particular situation on the topic, you may contact the Compliance Office. For Environment related queries, contact Enterprise Health and Safety Department or Nawah Environment and Sustainability Department.

E. INTEGRITY IN CARING FOR **OUR COMMUNITY**

We are committed to communicate objectively, openly, and honestly in local, national, and global discussions and respond to all inquiries from the public and media in the same manner.

19. COMMUNICATING EXTERNALLY EFFECTIVELY

Our Standard

Effective communication with our community and the public through different means including social media is very important to our business and we are committed to representing the Enterprise accurately, professionally, and respectfully.

Unauthorized and inappropriate releases of information to the public can lead to violation of laws and internal processes, and cause confusion to our Stakeholders, resulting in harming the Enterprise's image and reputation.

We know that the success of the Enterprise depends on inspiring trust and respect while communicating with the general public.

Employee Responsibility

As an Employee, I will not:

Use company resources to access or communicate offensive material that is punishable by law.

Act in a way that could damage the Enterprise reputation both during company or personal time or while at or off the workplace.

Represent the Enterprise or act as a spokesperson of the Enterprise without a proper authorization per the relevant procedures.

Cause an impression that my personal opinions are those of the Enterprise.

Intentionally or unintentionally post or discuss confidential information of the Enterprise on any social media platform or in public areas.

Publish information related to my work without prior authorization as per the applicable procedures.

Disclose personal information of others without obtaining their permission.

Seeking Help

If you are unsure of a particular situation regarding the above, you may talk to your line manager, contact the Compliance Office or the Enterprise Communications team.

F. REPORTING CHANNELS



Click the icon on your desktop to learn more about how you can properly raise concerns and report incidents.

20. DO YOU KNOW OUR REPORTING CHANNELS?

- **Continuous Behavior Observation Program (CBOP)**
Report behavior that may indicate drug or alcohol use on site: SitePersonnelSecurity@nawah.ae
- **Corrective action program (Markaz)**
Find, analyze, fix and trend undesired conditions: Markaz
- **Counterfeit Fraudulent, Suspect Items Program (CFSI)**
Prevent entry and installation of CFSI items in BNPP through oversight and quality inspection: cfsi@nawah.ae
- **Employee Concerns Program (ECP)**
Raise a Nuclear Safety Concern without fear of retaliation: ecp@nawah.ae
- **Anti-Fraud and Misconduct Program (AFMP)**
Anonymously report potential violations relating to Fraud or Misconduct: ireport@enec.gov.ae or ireport@nawah.ae
- **Non-Compliance Issues Reporting (Compliance)**
Report on non-compliance to legal & regulatory requirements: compliance@nawah.ae
- **Information Security**
Report suspicious activity on corporate digital asset, or the loss of company's data: team-infosec@nawah.ae

Cyber Security
Report cyber security related incidents related to the plant such as broken locks, and unauthorized PMMDs: team-cybersec@enec.gov.ae

Consolidated Security Operations Center
Report Cyber Security incidents such as network anomalies.
Information and Cyber Security Operations: csoc@nawah.ae
- **Enterprise Employee Grievance Committee (EEGC)**
Report employees' grievances in accordance with the HR Manual: eegc@nawah.ae

مؤسسة الإمارات للطاقة النووية
Emirates Nuclear Energy Corporation



شركة براكة الأولى ش.م.خ
Barakah One Company PJSC



شركة نواة للطاقة
Nawah Energy Company

