



COMPLIANCE PROGRAM AD MEPSO – SKOPJE

January, 2026

Based on Article 135 of the Energy Law* (“Official Gazette of the Republic of North Macedonia” No. 101/25 and 135/25), and in accordance with Article 19 of the Statute of the Electricity Transmission System Operator of the Republic of North Macedonia, a Joint Stock Company for electricity transmission and power system control, in state ownership, Skopje, AD MEPSO – Skopje (“Official Gazette of the Republic of North Macedonia” No. 206/18), the Management Board of AD MEPSO – Skopje, at its 65th session held on 12 February 2026, following the prior approval of the Regulatory Commission for Energy, Water and Municipal Waste Management Services of the Republic of North Macedonia (hereinafter referred to as: Energy Regulatory Commission) by Decision No. 12-75/3 dated 2 February 2026, hereby adopts the following:

COMPLIANCE PROGRAM AD MEPSO – SKOPJE

1. Subject matter and purpose of the Compliance Program

The subject matter of the Compliance Program (hereinafter referred to as: the Program) is to establish measures and activities aimed at ensuring conditions for preventing any possibility of discriminatory conduct by the Electricity Transmission System Operator of the Republic of North Macedonia, a Joint Stock Company for electricity transmission and power system control, in state ownership, Skopje (hereinafter referred to as: AD MEPSO – Skopje) towards users of the electricity transmission system (hereinafter referred to as: ETS), on any grounds; to define the obligations of employees in implementing the Program; and to establish the manner of monitoring the compliance of the operations of AD MEPSO – Skopje, as well as other obligations stipulated by the Energy Law and this Program.

Taking into consideration the significance and importance of the ETS for the Republic of North Macedonia, which is defined as critical energy infrastructure and must at all times ensure reliable and secure transmission of electricity to ETS users, it is particularly important to ensure full compliance with the legislation and standards governing the energy sector, as regulated by the Energy Law* (“Official Gazette of the Republic of North Macedonia” No. 101/25 and 135/25), rules, regulations, rulebooks and other implementing legislation.

Nevertheless, in order to ensure and protect the integrity of AD MEPSO – Skopje as a joint stock company (JSC) owned by the state and established in accordance with the Law on Trade Companies (LTC), additional obligations arise. Accordingly, in addition to the principal laws governing its operations, namely the Energy Law and the Law on Trade Companies, the Company’s operations must also comply with other laws, in particular: the Labor Relations Law, the Law on the System of Internal Financial Control in the Public Sector, the Law on the Protection of Whistleblowers, the Law on Prevention of Corruption and Conflict of Interest, the Law on Lobbying, the Law on Protection of Competition, the Law on Prevention and Protection against Discrimination, and the Law on Personal Data Protection, thereby ensuring the protection of the integrity of AD MEPSO – Skopje.

In this regard, compliance represents an important link in the management chain of AD MEPSO – Skopje and entails the establishment of a comprehensive system of policies, rules and procedures that ensures that AD MEPSO – Skopje operates within the framework of laws, regulations and professional standards. However, compliance in itself is not sufficient if it is not supported by an appropriate ethical culture.

It is also important to emphasize that one of the key roles is risk management in operations, particularly the identification and mitigation of risks arising from potential threats such as corruption, conflicts of interest, violations of human rights and financial misconduct, with the aim of taking action before such risks cause harm. In this regard, a well-designed compliance policy is not merely a means of protection against penalties or sanctions, but also an opportunity to build a culture of accountability and transparency.

According to the relevant standards in this field, the first line of defense of the integrity of the compliance system is the Supervisory Board and the Management Board of AD MEPSO – Skopje, while the Compliance Function (Compliance Officer) represents the second line of defense, and the third line of defense comprises internal and external audit, as well as supervisory and regulatory bodies.

In order to strengthen these so-called lines of defense for the integrity of the compliance system, the system is established and supported through the introduction and application of relevant standards.

In this context, the most important applicable standards are the following: ISO 37301:2021 (Compliance Management Systems), which specifies requirements and provides guidance for establishing, implementing, evaluating, maintaining and improving a compliance management system; ISO 37302 (Compliance Management Systems), which provides a framework of indicators and guidance for assessing the effectiveness of a compliance management system; ISO 37303:2025 (Compliance Management Systems), which provides guidance for determining and developing the competencies (knowledge, skills and experience) required for an effective compliance management system; and ISO 37001 (Anti-Bribery Management Systems), which addresses the prevention of and management of the risk of bribery and corruption.

The primary objective of the Program is to establish a formal framework that will ensure that all activities carried out by AD MEPSO – Skopje, as well as the conduct of all employees and persons engaged by AD MEPSO – Skopje, are in accordance with the principles of transparency, non-discrimination, independence and objectivity. In particular, the objective of the Program is to establish a system for managing compliance with the applicable legislation of the Republic of North Macedonia in the areas of transparency and non-discrimination towards all users of the Electricity Transmission System (ETS), aimed at continuous improvement based on risk assessment, internal controls and audits.

Within the compliance management system of energy companies, risk assessment and the security of energy infrastructure are integrated into every phase and constitute a basis for managerial decision-making in terms of development, investments, application of technologies, modernization and IT systems, cybersecurity and organizational changes.

Control and monitoring of compliance with regulatory and security requirements are incorporated into the “control mechanisms” phase and represent a key element of the compliance management system.

Modern mechanisms for implementing compliance management in energy companies include models for monitoring compliance and control of the operational security of energy infrastructure. Assessment models have been developed that provide real-time information on current technical conditions, using indicators of the operational status of the energy infrastructure. This enables continuous monitoring of the technical condition of equipment, thereby supporting efficient system management, which is also one of the objectives pursued by AD MEPSO – Skopje.

Taking into consideration the foregoing, as well as the full alignment of domestic legislation in the energy sector with EU legislation, and pursuant to Article 135 of the Energy Law (“Official Gazette of the Republic of North Macedonia” No. 101/25 and 135/25), the need for and manner of adopting the Compliance Program, as well as its content, are precisely defined, particularly with regard to independence, impartiality, accountability and transparency in operations, with a high degree of ethical conduct, as well as the measures to be undertaken to prevent discrimination against users of the ETS, the obligations of employees in implementing the Program, and the manner of monitoring the compliance of the operations of AD MEPSO – Skopje.

The Program also serves to achieve the objectives set out in the adopted Integrity Policy No. 02-2893/2-1 of 2024, which requires zero tolerance with regard to corruption. Through this Policy AD MEPSO – Skopje is required to establish a system for protection against bribery and corruption and for preventing discrimination against users, based on the principles of Equality, Transparency and Partnership.

Nevertheless, the focus of this Program is to ensure transparent and objective conduct by AD MEPSO – Skopje towards users of the Electricity Transmission System, full compliance with applicable legislation and standards, the establishment and maintenance of an ethical culture and integrity in operations, the prevention and management of risks related to corruption, conflicts of interest, misuse of resources and other violations, as well as the protection of the reputation of AD MEPSO – Skopje and the trust of customers, employees, partners and users of the Electricity Transmission System.

2. Basic Information on AD MEPSO – Skopje

2.1. Legal Form, Activities and Ownership Structure of AD MEPSO – Skopje

AD MEPSO – Skopje is a company engaged in the transmission of electricity and the operation of the electricity transmission system in the Republic of North Macedonia, with an obligation to provide a public service. It does not perform other energy activities and is fully independent from the performance of other energy activities, in accordance with the Energy Law. The primary objective and core responsibilities of AD MEPSO – Skopje are to ensure the uninterrupted transmission of electricity and the operation of the electricity system, i.e. security of electricity supply.

Historically, with the adoption of the Law on the Transformation of the Macedonian Power Industry in 2004 (“Official Gazette of the Republic of Macedonia” No. 19/04), the conditions were created in the Republic of Macedonia for restructuring the previously vertically integrated enterprise for the generation, transmission and distribution of electricity, AD “Elektrostopanstvo na Makedonija”, into three newly established companies: AD MEPSO – Skopje (a company for electricity transmission and organization of the electricity market), AD ELEM – Skopje (a company for electricity generation), and AD ESM (a company for electricity distribution and supply). The functional unbundling of these activities represented the first step towards the liberalization of the electricity market.

AD MEPSO – Skopje was established by a Decision of the Government of the Republic of Macedonia in 2004 and was registered in the Trade Register of the competent court in Skopje on 31 December 2004.

AD MEPSO – Skopje owns the electricity transmission network, consisting of substations, line infrastructure facilities – transmission lines, plants, facilities and assets used for performing the energy activity of electricity transmission and operation of the electricity transmission system.

Since 14 November 2005, AD MEPSO – Skopje has held a license to perform the energy activity of electricity transmission, under registration number EE-01.02.1/05/2/17, valid until 14 November 2040.

AD MEPSO – Skopje has been a member of the European Network of Transmission System Operators for Electricity (hereinafter: ENTSO-E) since its establishment in 2009. ENTSO-E comprises 43 transmission system operators from 36 European countries. ENTSO-E was established pursuant to the Third Energy Package of European Union legislation concerning the internal energy market (hereinafter: the Third Package). The main objective of ENTSO-E is to address the challenges arising from changes in the electricity system while ensuring security of supply.

In the preceding period, in order to comply with the provisions of the Energy Law* relating to the ownership unbundling of entities performing energy activities, a procedure was carried out for the transfer of ownership of the shares from the Government of the Republic of Macedonia pursuant to Article 237 of the Energy Law*. On 24 July 2018, the Government of the Republic of Macedonia adopted a Decision on the transfer of shares owned by the Government of the Republic of Macedonia to the ownership of the Ministry of Transport and Communications, No. 44-6841/1 of 24 July 2018, pursuant to which the ownership unbundling of AD MEPSO – Skopje as the transmission system operator of the Republic of Macedonia was carried out.

In this context, with the aim of ensuring continuity in fulfilling the obligations relating to the ownership unbundling and independence of entities performing energy activities, in accordance with the Energy Law (“Official Gazette of the Republic of North Macedonia” No. 101/25 and 135/25), a procedure was carried out for the transfer of ownership of the shares from the Government of the Republic of North Macedonia.

Accordingly, pursuant to Article 308 of the Energy Law*, the Government of the Republic of North Macedonia adopted Decision on the Transfer of Shares No. 50-6306/18 of 24 July 2025, whereby the shares owned by the Ministry of Transport were transferred to the ownership of the Ministry of Energy, Mining and Mineral Resources (hereinafter: MEMMR). This ensured continuity in fulfilling the obligation concerning the independence of the management of AD MEPSO – Skopje as the transmission system operator of the Republic of North Macedonia.

The shares of AD MEPSO – Skopje are owned by the Ministry of Energy, Mining and Mineral Resources and were registered with the Central Securities Depository of the Republic of North Macedonia on 24 August 2025.

The Ministry of Energy, Mining and Mineral Resources, as the sole shareholder at the General Meeting of Shareholders of AD MEPSO – Skopje, may neither request nor accept instructions or directions from the Government of the Republic of North Macedonia or any other state authority. The General Meeting of Shareholders is chaired by the Minister of Energy, Mining and Mineral Resources or by a person authorized or empowered by the Minister.

Under this Program, pursuant to Article 115 paragraph (2) of the Energy Law*, it is specifically emphasized that, where the electricity market operator is owned by the transmission system operator, the electricity market operator shall ensure its functional independence from the transmission system operator with regard to its legal form, organization and decision-making.

2.2. Management and Organizational Structure of AD MEPSO – Skopje

The management of AD MEPSO – Skopje is organized under a two-tier governance system, consisting of a Supervisory Board and a Management Board. Based on the Law on Trade Companies and the Articles of Association of the Company, the Supervisory Board exercises control and oversight over the work of the Management Board, which, pursuant to the Articles of Association, has the broadest powers for decision-making and management of AD MEPSO – Skopje. The members of the Supervisory Board are elected by the General Meeting of Shareholders of AD MEPSO – Skopje, while the members of the Management Board are appointed by the Supervisory Board.

The Management Board consists of the President of the Management Board, who is also the Chief Executive Officer (CEO), the Deputy Chief Executive Officer, as well as directors of the sectors and subsidiaries within AD MEPSO – Skopje, namely:

- Legal and General Affairs Sector;
- Financial Affairs Sector;
- Information Technology and Telecommunications Sector;
- Transmission Network Operator Subsidiary; and
- Electricity Transmission System Operator Subsidiary.

Pursuant to the Energy Law, AD MEPSO – Skopje, as the holder of a license for electricity transmission, may not hold licenses for or engage in the activities of electricity generation, distribution, trading or supply, nor may it hold a license for the organization and operation of the electricity market.

Taking this into account, AD MEPSO – Skopje established and is the owner of the company Macedonian Energy Market Operator – MEMO DOOEL Skopje, which was registered in the Central Registry of the Republic of Macedonia on 8 October 2018.

3. Manner of Fulfilling the Obligations under the Program

3.1. Independence of the Management Board and Supervisory Board of AD MEPSO – Skopje

One of the most important aspects ensuring ownership unbundling is the independence of the operations of the Management Board and Supervisory Board of AD MEPSO – Skopje. This independence primarily derives from the structural organization and ownership unbundling in relation to the previously vertically integrated electricity system.

In this regard, and with the aim of ensuring the independence of the transmission system operator, the same person or persons shall not be entitled, at the same time, to:

1. directly or indirectly participate in the management and governance of a company engaged in the activities of electricity generation, storage, supply or trading and, at the same time, directly or indirectly manage or exercise any other right in the transmission system operator;
2. directly or indirectly participate in the management and governance of the transmission system operator and, at the same time, directly or indirectly manage or exercise any other right in a company engaged in the activities of electricity generation, storage, supply or trading;
3. appoint members of the supervisory body or management body of the transmission system operator and, at the same time, directly or indirectly manage or exercise any other right in a company engaged in the activities of electricity generation, storage, supply or trading; and
4. be a member of the supervisory body, management body or any of the bodies legally representing the transmission system operator and, at the same time, be a member of a corresponding body or entity in a company engaged in the activities of electricity generation, storage, supply or trading.

The above restrictions apply in particular to the exercise of voting rights, election and appointment of members of the Management Board and Supervisory Board of AD MEPSO – Skopje, or the ownership of a majority interest.

Furthermore, the Ministry of Energy, Mining and Mineral Resources (MEMMR) acts independently when making decisions on the appointment of the supervisory or management bodies of the company. In order to ensure the independence of the Company's operations, the members of the Management Board and Supervisory Board of AD MEPSO – Skopje:

- shall act independently in the decision-making process in accordance with the law; and
- may not be appointed as members of the supervisory or management bodies of companies engaged in electricity generation, storage, supply or trading, or of companies that have the ability to directly or indirectly influence decision-making in such companies.

For the purposes of this provision, a company engaged in electricity generation, storage, supply or trading shall also include:

1. a company engaged in any of the activities of gas generation, storage, supply or trading;
2. a consumer that directly or indirectly participates in the management of companies engaged in electricity generation, storage and/or supply shall not be considered such a company if:
 - on an average annual basis, it is a net consumer of electricity, taking into account its participation in electricity generated by the companies in whose management it participates; and
 - the value of electricity it sells to third parties is insignificant compared to its other business activities.

Based on the foregoing and in accordance with the Energy Law, it is considered that an appropriate foundation has been established to ensure ownership unbundling and full independence in the operation of the Management Board and Supervisory Board of AD MEPSO – Skopje.

3.2. Ensuring Transparent, Objective and Non-Discriminatory Treatment of Users of the Electricity Transmission System by AD MEPSO – Skopje

AD MEPSO – Skopje is obliged, within the scope of its operations, to act in accordance with the Energy Law in a manner that ensures transparent, objective and non-discriminatory access and treatment of all users of the electricity transmission system, without creating a privileged position for certain users of the electricity transmission system at the expense of other users.

AD MEPSO – Skopje ensures equal treatment of ETS users in the implementation of the following activities/processes:

1. connecting electricity producers, storage system operators and electricity consumers, as well as electricity distribution systems, including closed electricity distribution systems, in the Republic of North Macedonia to the electricity transmission network;
2. publishing on its website, or otherwise providing, all information necessary for access, as well as electricity transmission tariffs, and providing all users with access to the electricity transmission system;
3. planning and developing the electricity transmission network through the construction of new and upgrading of existing interconnection lines with neighboring countries, while taking into account the efficient utilization of existing interconnection capacities and the balance between investment costs and benefits for consumers;
4. publishing data and providing timely information on the timing and manner of allocation of cross-border transmission capacities on interconnection transmission lines under market conditions, in a transparent and non-discriminatory manner;
5. procuring electricity to cover losses in the electricity transmission network and electricity for own consumption, with the aim of ensuring the secure and reliable operation of the ETS, under market conditions and in a transparent and non-discriminatory manner;
6. procuring system balancing services for the electricity transmission system and ensuring balancing of the electricity system, imbalances settlement and balancing services, as well as ensuring the calculation, invoicing and collection of balancing service charges;
7. ensuring the installation and maintenance of electricity metering devices at all metering points at the points of receipt and delivery within the electricity transmission system and providing metering data to system users;
8. ensuring access by ETS users to metering devices owned by AD MEPSO – Skopje;
9. ensuring the confidentiality of the business data of users of the electricity transmission system; and

10. undertaking other activities and processes aimed at ensuring transparent, objective and non-discriminatory access and treatment of all ETS users, without creating a preferential position for certain ETS users at the expense of other ETS users.

3.3. Measures Applied by AD MEPSO – Skopje to Ensure Transparent, Objective and Non-Discriminatory Treatment of Users of the Electricity Transmission System

In order to ensure transparency and objectivity and to prevent discriminatory conduct in fulfilling its obligation to provide a public service, AD MEPSO – Skopje, as the transmission system operator on the territory of the Republic of North Macedonia, shall undertake measures to eliminate any form of discrimination against users of the electricity transmission system, as follows:

1. Enables the right of access, connection and use of the electricity transmission network in accordance with the Grid Rules for Electricity Transmission.

In fulfilling this obligation, AD MEPSO provides administrative support and cooperates with MEMMR regarding the procedure for connecting the applicant (user) to the electricity transmission network through the Connection Service within the Development and Investment Department.

2. Ensure equal treatment of all users of the electricity transmission system, meaning that, in procedures relating to the procurement of electricity for losses, electricity for own consumption and system balancing, no user shall be placed in a preferential position at the expense of another user.

3. Provide reasons and clearly state the grounds on which a request for access to the electricity transmission network has been rejected.

4. Guarantee the right to lodge an appeal against decisions of AD MEPSO – Skopje, which shall be submitted to the Energy Regulatory Commission.

5. Ensure clear, precise and reasoned decisions adopted within the prescribed deadlines regarding the granting of the right to use the electricity transmission system by AD MEPSO – Skopje.

These activities shall be carried out in accordance with the Rules for Procurement of Electricity to Cover Losses in the Transmission System, the Rules for Procurement of Electricity for Own Consumption, the Rules for the Balancing Energy Market, the Grid Rules for Electricity Transmission, the Rules for Registration for Participation in the Electricity Market and Regulation of the Bilateral Contracts Market, and the Rules for Allocation of Available Cross-Border Transmission Capacities (specific to each border), adopted by the Management Board of AD MEPSO – Skopje.

6. Guarantee the confidentiality of business data and information and prevent the misuse of business secrets and information obtained in the course of performing the activity of electricity transmission and operation of the electricity transmission system for the purpose of obtaining a business benefit, as well as prevent discriminatory actions for the benefit of third parties, in accordance with the Law on Free Access to Public Information, the Rulebook on Business Secrets of AD MEPSO – Skopje, and the Rulebook on the Manner of Use and Publication of Data and Information in the Operations of AD MEPSO – Skopje.

The implementation of these activities within AD MEPSO – Skopje is carried out by the official responsible for mediation regarding information of public character.

4. Manner of Implementation and Monitoring of the Compliance Program

4.1. Compliance Officer

The implementation of this Program shall be monitored by the Compliance Officer in accordance with the Energy Law and the Statute of AD MEPSO – Skopje.

During the term of office, the Compliance Officer may not perform any other professional activity, nor may they have any interest or business relationship, directly or indirectly, with companies operating in the energy sector or with their members or shareholders.

The procedure for the appointment and dismissal, the term of office, the scope of work, the duties and authorities, the rights and obligations regarding the education and training of employees, the prohibition of performing other professional activities, and the Compliance Officer's free access to information within AD MEPSO – Skopje shall be prescribed by the Rulebook on the Work, Authorities, Rights and Obligations of the Compliance Officer.

4.2. Areas in Which Compliance Is Monitored

Taking into account the specific role and responsibility for the implementation of the Program, the Compliance Officer shall monitor the implementation of the Program with regard to:

- independence, transparency, objectivity and impartiality in the operations of AD MEPSO – Skopje;
- prevention of discrimination against users of the electricity transmission system on any grounds;
- confidentiality of business data of users of the electricity transmission system;
- mapping and assessment of integrity and corruption risks;
- management and mitigation of corruption risks;

- coordination and cooperation of AD MEPSO – Skopje with other electricity system operators, exchange of data with operators of other transmission systems, and participation in the work of regional and international organizations;
- education and informing of the Management Board and Supervisory Board of AD MEPSO – Skopje, as well as employees of AD MEPSO – Skopje, regarding conduct in accordance with the principles of independence, transparency and impartiality.

In addition, the Compliance Officer shall monitor the activities of the Transmission System Operator with regard to cooperation, which shall be carried out on a non-discriminatory basis with any person that owns, develops or operates an energy storage facility and connects such facility to the grid.

Particular attention shall be given to monitoring the activities of the Transmission System Operator in view of the fact that, pursuant to Article 131 paragraph (2) of the Energy Law*, it is not permitted to own, develop, use or operate an energy storage facility. The Transmission System Operator may be authorized by a decision of the Energy Regulatory Commission to own, develop, use or operate an energy storage facility only if the conditions set out in Article 131 paragraph (3) of the Energy Law* are fulfilled.

4.3. Conditions for Compliance Monitoring

For the purpose of ensuring the conditions necessary for monitoring the implementation of the Program, AD MEPSO – Skopje shall provide the Compliance Officer with access to all data and information necessary for the exercise of their authorities and, upon request, shall grant access to all facilities and premises in which it conducts its activities.

The Compliance Officer shall act in accordance with the provisions of the Energy Law, this Program, the Statute of AD MEPSO – Skopje and the Rulebook on the Work, Authorities, Rights and Obligations of the Compliance Officer, pursuant to which the Compliance Officer shall:

- monitor the implementation of the Program and prepare an annual report on the measures undertaken for its implementation, which shall be submitted to the Energy Regulatory Commission;
- submit reports to the Supervisory Board of AD MEPSO – Skopje and provide recommendations regarding the Program and its implementation;
- notify the Energy Regulatory Commission in writing of significant violations in the implementation of the Program.

5. Measures Against Corrupt Practices

The measures to be undertaken pursuant to the Program for the purpose of preventing corrupt practices, based on this Program and in accordance with the Integrity Policy, are as follows:

- Clear rules for identifying and sanctioning prohibited conduct, conflicts of interest, gifts, lobbying and abuse of official position;
- Precise standards and a Code of Conduct for employees and management;
- Mandatory employee education and training;
- Identification of high-risk processes, including public procurement, human resources, finance, inspection and supervision, and similar processes;
- Identification and mapping of weaknesses and barriers in work processes;
- Preparation and updating of a Risk Register (strategic, operational and *compliance* risks) in accordance with the Methodology for Risk Management in Public Sector Entities, which defines these risks as follows:
 - strategic risks, which represent undesirable events that may have a negative impact on the achievement of the long-term and medium-term objectives and strategic priorities of AD MEPSO;
 - operational risks, which represent undesirable events that may have a negative impact on the performance of functions, activities and processes within AD MEPSO, as well as on the quality and reliability of the public service (electricity transmission), whereby the cumulative effects of operational risks may threaten certain strategic objectives. In this regard, operational risks may also result in strategic risks; and
 - compliance risks, which include: legal risks (non-compliance with laws and regulations, non-compliance with energy, public procurement, safety and labor regulations, non-compliance with internal procedures, and similar risks); regulatory risks (non-compliance with regulatory requirements, reporting obligations and data requirements in relation to the Energy Regulatory Commission); anti-corruption risks (establishment of corrupt practices, conflicts of interest, prohibited gifts, commissions or undue influence, lack of transparency in procurement and similar risks); financial risks (improper accounting, undeclared financial transactions, non-compliance with tax obligations, improper application of accounting standards and similar risks); cybersecurity and data privacy risks (non-compliance with cybersecurity rules, unauthorized access, leakage of confidential information, lack of records of personal data processing, insufficiently trained personnel and similar risks); and ethical risks (discrimination, workplace harassment, non-compliance with the Code of Conduct and similar risks).

The consequences of *compliance* risks may be significant and may include: substantial regulatory fines, legal proceedings, termination of contracts, loss of licenses, reputational damage, business interruption, loss of trust among partners, loss of integrity and confidentiality, and similar consequences.

Accordingly, pursuant to this Program, any form of corrupt conduct within AD MEPSO – Skopje is strictly prohibited, and AD MEPSO – Skopje shall undertake measures to prevent any form of corrupt conduct. Corrupt conduct by an employee, member of the Management Board, member of the Supervisory Board or Compliance Officer includes:

- directly or indirectly requesting or accepting a gift or other benefit, or accepting a promise of a gift or other benefit for oneself or another person, in order to perform an official act that should not be performed or to refrain from performing an official act that should be performed;
- giving, promising or offering a gift or other benefit for oneself or another person in order to induce the performance of an official act that should not be performed or the omission of an official act that should be performed, as well as acting as an intermediary in such conduct;
- participating in the preparation of analyses, studies, projects and similar documents for and on behalf of existing and potential users of the electricity transmission system;
- giving oral or written instructions or imposing obligations by persons in higher hierarchical positions on professional or other personnel to undertake actions that are not in accordance with applicable laws, internal acts and other regulations;
- ensuring confidentiality and protection of employees in accordance with the Law on protection of Whistleblowers; and
- other measures provided for in the Annual Anti-Corruption Action Plan and the Integrity Policy of AD MEPSO.

Every employee of AD MEPSO – Skopje, member of the Management Board, member of the Supervisory Board, as well as the Compliance Officer, shall, upon becoming aware of or otherwise identifying such conduct, report it as corrupt conduct to the State Commission for Prevention of Corruption (SCPC) or to another competent authority legally responsible for taking action in relation to the prevention of corruption.

6. Final Provisions

This Program shall be published on the notice boards of AD MEPSO – Skopje and on the website of AD MEPSO – Skopje.

This Program shall enter into force on the date of its adoption and shall apply as of the date of its approval by the Energy Regulatory Commission.

AD MEPSO – SKOPJE