

2023



Savannah River Nuclear Solutions

External Code of Business Ethics

SRNS. We make the world safer.



From Dennis Carr, SRNS President and CEO

At SRNS, we are committed to making the world safer as the management and operating contractor for the Savannah River Site (SRS) for the Department of Energy. We are guided by the following core values: Integrity, Safety, Teamwork, and Customer Satisfaction. These values describe our company as we want it to be. This Code represents our commitment to the highest standards of ethics, transparency, and security. We believe that putting this Code into practice creates long term benefits for SRNS, our employees, our customers, our contractors/suppliers, recipients of our corporate philanthropy, and the communities we serve. These ethical standards are expected to be applied by all SRNS subcontractors and suppliers in all dealings with SRNS and SRS as a whole.

Savannah River Nuclear Solutions
Aiken, S.C. 29808
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Vision and Purpose

As the Management and Operating (M&O) contractor of the SRS for the United States Department of Energy (DOE), SRNS is committed to being good stewards of taxpayer resources and upholding the highest standards in all our business dealings. This commitment is essential to SRNS' continued success, and we believe that it positively impacts our diverse and worldwide suppliers, contractors, philanthropic recipients, customers, employees, parent companies, and the communities where we do business.

This External Code of Business Conduct (Code) applies to SRNS subcontractors, SRNS suppliers, all other entities entering into agreements with SRNS, and recipients of SRNS community giving (collectively, "you"). The Code will guide you in understanding and complying with SRNS expectations, including modeling the core values of SRNS. The Core Values of SRNS are Integrity, Safety, Teamwork, and Customer Satisfaction. You are expected to follow the Code and are also expected to require your subcontractors, suppliers, other entities entering into agreements, and recipients of giving to conform as well. Our mutual success and continued business relationship depend on it. SRNS reserves the right to verify you are meeting SRNS expectations. Failure to act in a manner consistent with these expectations may impede our ability to do business together.

SRNS expects you to maintain and enforce policies requiring adherence to lawful and ethical business practices that encompass our expectations, as appropriate. These expectations may be updated or amended. For questions, comments, or training support about our expectations, please contact your SRNS representative or the SRNS Compliance Office. You can also see how SRNS defines expectations for its employees in its Code of Business and Ethical Conduct.

Working together, we can ensure longevity and world-class excellence as **we make the world safer.**

General Disclaimer

This Code does not modify the terms and conditions of any existing contract or agreement or otherwise create a contractual relationship between SRNS and you. Where conflicts may arise, deference should be given to any existing contractual agreement between the parties.

Consequences for Violating Code

In the event of a violation of any of the expectations of this code, we may pursue corrective actions to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with you under the terms of our existing agreement(s).

Savannah River Nuclear Solutions, a Fluor and Hill partnership company, is responsible for the management and operations of the Department of Energy's Savannah River Site, located near Aiken, South Carolina. The SRNS corporate and community offices are located in the renovated 1912 "Old Post Office" building in Aiken. The primary initiatives of SRNS are national security, clean energy and environmental stewardship.

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Compliance with Laws

SRNS has embraced a set of values and established high ethical standards for the conduct of our business.

SRNS considers adherence to our company Core Values and Ethics Code, as well as strict compliance with all applicable U.S. and foreign laws and regulations, to be not only a legal requirement but also an ethical obligation. Everyone associated with SRNS is expected to make this commitment their own. This includes anyone who represents the company in any capacity – regardless of their position. Individuals are responsible for the integrity and consequences of any actions that are taken on behalf of SRNS.

We expect you to maintain full compliance with all laws and regulations applicable to your business. When conducting international business, or if your primary place of business is outside the United States, we expect you to comply with local laws and regulations.

As the Management and Operating Contractor for SRS on behalf of DOE, SRNS expects you comply with applicable laws, regulations, orders, and directives relating to work for Government entities and/or agencies.

Environment, Health and Safety

We expect you to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We also expect you to apply environmental management system principles to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment.

We expect you to comply with all applicable environmental, health and safety laws, regulations, and directives. You should protect the health, safety, and welfare of your personnel, visitors, and others who may be affected by your activities.

In accordance with our Core Values, we expect our suppliers and contractors performing work on SRS to utilize safety pause, time out, and/or stop work practices when a situation is uncovered or an event occurs that was unexpected and/or could jeopardize the safety, health, and/or security of any facility or member of the workforce at the SRS. We also expect our suppliers and contractors performing work on the SRS to immediately report all injuries to SRNS.

Quality

Contractors and suppliers must take due care to ensure their work product meets our quality standards. We expect our contractors and suppliers to have in place quality assurance processes to identify defects, implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements.

Counterfeit Parts

We expect our contractors and suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverables. Effective processes should be in place to detect counterfeit or inadequate parts and materials, provide notification to recipients of such product(s) when warranted, and exclude them from the delivered product.

Accurate Records and Financial Controls

We expect you to:

- Keep accurate, complete, fair, timely, transparent, and understandable financial and operational books, records, and accounts, as well as a system of effective internal controls;
- Create, retain, and dispose of business records in accordance applicable legal and contractual requirements; and
- Keep accurate and complete records prepared for SRNS, including records of work time and expenses.

Anti-Corruption

You must comply with the anti-corruption laws, directives and/or regulations that govern operations in countries in which you do business, such as the U.S. Foreign Corrupt Practices Act.

We expect you to refrain from offering or making any improper payments of money, or anything of value, to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action, like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments are permitted where there is an imminent threat to health and/or safety.

We expect you to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultants.

Gifts/Business Courtesies

We expect you to compete on the merits of your products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage or attempt to influence actions by Government personnel. In any business relationship, you must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

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Subcontractors and suppliers are reminded that it is inappropriate to offer any gifts, meals, any form of entertainment (e.g., tickets to sporting events), or other gratuity to any of our personnel. Even gifts or items of nominal value may create ethical implications for an otherwise appropriate relationship.

Illegal Payments

We require that you not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

Anti-Trust

We expect you to comply with all laws and regulations regarding anti-competitive business practices and activities. We also expect you not to fix prices or rig bids with your competitors. You must not exchange current, recent, or future pricing information with competitors. You must refrain from participating in a cartel.

Insider Trading and On-Site Marketing

We expect you and your personnel to not use non-public information obtained during your business relationship with us as the basis for trading or for enabling others to trade in the securities of our company, its members, or those of any other company.

SRNS does not allow marketing of future services at SRS by incumbent SRNS subcontractors while working under an existing subcontract unless authorized in writing by the SRNS Supplier Development Group within SRNS Supply Chain Procurement. This type of activity represents a violation of acceptable business practice and may include, for example, exclusion from future opportunities at SRS and/or disallowed costs under the existing subcontract.

Conflicts of Interest

We expect you and your employees, agents, consultants, subcontractors, and other related parties to avoid all conflicts of interest or situations giving the appearance of a conflict of interest in dealings with our company. We further expect you to provide notification to all affected parties if an apparent, actual, or potential conflict of interest arises. This includes a conflict between the interest of our company and personal interests or those of close relatives, friends, or associates.

We expect prompt disclosure of actual or potential organizational conflicts of interest together with a proposed resolution. This includes disclosure of any established business interests, ownership, alliances, or teaming relationships with other SRNS suppliers or service providers.

Human Rights

We expect you to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

Human Trafficking

We expect you to adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which you operate. You are expected to refrain from violating the rights of others and address any adverse human rights impacts of your operations. You are also expected to educate employees on prohibited trafficking activities and discipline employees found to have violated the law or rules. If you are a contractor or supplier and become aware of violations, you should notify the appropriate SRNS procurement representative and provide information concerning the actions taken. Specifically, SRNS contractors and suppliers should not perform any of the following actions:

- Destroying, concealing, or confiscating identity or immigration documents;
- Using misleading or fraudulent tactics in recruiting;
- Charging employee recruitment fees or providing inadequate housing based on local standards, laws, and directives;
- Failing to provide employment contracts and other documentation in the employee's native language;
- Failing to provide return transportation upon the end of employment for employees brought to the country for the purpose of working on a U.S. government contract or subcontract; and
- Failing to interview and protect employees suspected of being trafficking victims.

Employment Practices

Harassment

We expect you to ensure your employees are afforded an employment environment that is free from physical, psychological, sexual, and verbal harassment, or other abusive conduct.

Non-discrimination

We expect you to provide equal employment opportunity to employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

Substance Abuse

We expect you to maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances, as well as the use or possession of alcohol.

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Information Protection

We expect you to properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purposes (e.g., advertisement, publicity, and the like) other than the business purposes for which it was provided, unless there is prior written authorization from the owner of the information. This includes accessing information on a need-to-know basis within the confines of your work scope and using non-public information for personal or company gains at the expense of SRNS procurement integrity, SRNS, and/or the Government.

We expect you to respect and comply with all the laws governing intellectual property.

Trade Compliance

Security

When applicable, SRNS contractors and suppliers are encouraged to implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

Import and Export

We expect our contractors and suppliers to ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import and/or export of parts, components, and technical data.

Anti-Boycott

Our contractors and suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the 1977 Export Administration Act and the 1976 Tax Reform Act.

Reporting Concerns and Whistleblower Protections

Whistleblower Protection

We expect you to provide your employees with avenues or forums to raise legal or ethical issues or concerns without fear of discrimination, reprisal, or retaliation. We also expect you to take action to prevent, detect, and correct any such practices which may be a result of reporting protected disclosures.

Reporting Concerns

You and your employees should promptly report any business or ethics concern involving or affecting SRNS, whether the concern involves the entity, by contacting one of the following:

- Their SRNS representative
- The SRNS Procurement Ombudsman
- The SRNS Technology Transfer Ombudsman
- The SRNS Ethics Hotline

The SRNS Ethics Hotline 803.725.8181, the SRNS Compliance email SRNSCompliance@srs.gov and the SRNS Ethics email SRNSEthics@srs.gov are ways for SRNS employees, suppliers, contractors, and others to report activities that may involve illegal or unethical conduct or violations of this Code. A supplier or contractor may also be requested to take such steps as SRNS may reasonably request to assist SRNS in the investigation of any compliance or ethics concern involving SRNS and the supplier or contractor. SRNS policy prohibits retaliation against any person reporting a concern in good faith. Contact the SRNS Ethics Hotline if you feel retaliated against because you reported a compliance or ethics concern.