

Policy

CPCC-POL-LEG-52842

Code of Ethics and Business Conduct Policy

Revision 1, Change 0

Published: 07/03/2024

Effective: 07/03/2024

Program: Legal

Topic: Legal

Technical Authority: Anderson, Stacie M
Functional Manager: Page, Christopher B

Use Type: Administrative



USQ Facility	USQ Review	Screeners
Solid Waste Operations Complex	Exclusion Reason: <i>N/A per B-19</i>	
Canister Storage Building/Interim Storage Area	Exclusion Reason: <i>N/A per B-19</i>	
Waste Encapsulation Storage Facility	Exclusion Reason: <i>N/A per B-19</i>	
Transportation	Exclusion Reason: <i>N/A per B-19</i>	
Capsule Storage Area	Exclusion Reason: <i>N/A per B-19</i>	
Below HazCat 3	Exclusion Reason: <i>N/A per B-19</i>	
105 KW Facility	Exclusion Reason: <i>N/A per B-19</i>	
324 Building	Exclusion Reason: <i>N/A per B-19</i>	
D4ES-Central Plateau	Exclusion Reason: <i>N/A per B-19</i>	

JHA: Administrative

Periodic Review Due Date:07/03/2029

Publication Correction:07/08/2024

Rev. 1, Chg. 0

Change Summary

Description of Change

Revision, changes throughout.

Publication Correction 7/8/24 for spelling correction.

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

TABLE OF CONTENTS

1.0 PURPOSE AND SCOPE.....3
2.0 ROLES AND RESPONSIBILITIES.....3
2.1 Management.....3
2.2 Ethics and Compliance.....4
2.3 Legal General Counsel.....4
3.0 POLICY.....4
3.1 Integrity.....6
3.2 Inclusion, Equal Employment, Nondiscrimination and Harassment Free.....7
3.3 Duty to Report.....8
3.3.1 Why is Reporting Important?.....8
3.3.2 Do I have a Duty to Report?.....8
3.3.3 CPCCo's Duty to Report.....9
3.3.4 Raising Concerns and Zero Tolerance for Retaliation.....9
3.4 Ethics.....10
3.4.1 Avoiding Conflict of Interest.....10
3.4.2 Time Reporting.....12
3.4.3 Responding to Audits or Investigations.....13
3.4.4 Gifts, Gratuities, and Entertainment.....13
3.5 Fundamentals of Business Data and Information.....15
3.6 Your Signature.....15
3.7 Computer Usage.....16
3.8 Confidentiality of Information and Records.....17
3.9 Traveling on Official Business and Expense Reporting.....17
3.10 Mail.....18
3.11 Specialty Rules for High Visibility Organizations.....18
3.11.1 Accounting and Reporting.....18
3.11.2 CPCCo Employees in Contracts or with Purchasing Authority.....19
3.11.3 Purchasing Card (P-Card).....20
3.12 Safety.....20
3.12.1 Commitment to Safety.....20
3.12.2 No Weapons or Workplace Violence.....21
3.12.3 Drug and Alcohol-Free Workplace.....21
3.12.4 Protect Government Property.....22
3.12.5 Environmental Stewardship.....23
3.12.6 Security and Safeguards.....23
3.12.7 Report Security Events.....24
4.0 FALSIFICATION OF RECORDS OR REPORTS IS CONSIDERED EXTREMELY SERIOUS MISCONDUCT. EMPLOYEES MUST REPORT ANY FALSIFICATION OF REPORTS OR RECORDS TO CPCCO LEGAL GENERAL COUNSEL'S OFFICE.SOURCES.....25
4.1 Requirements.....25
4.2 References.....25
4.3 Bases.....25

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

List of Tables

Table 1 – What do I Need to Do?.....5

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024****1.0 PURPOSE AND SCOPE**

We all want to work where everyone is treated fairly and professionally, which requires basic guidelines to be established and communicated. This policy provides general and specific guidance to help achieve the workplace standards and professional behavior expectations for Central Plateau Cleanup Company, LLC (CPCCo) employees as well as entities we do business with.

Ethical behavior is more important than ever given the diversity of society and business compliance climate we work in today. The information and principles in the Code of Ethics and Business Conduct (Code of Ethics) reflect specific actions we must all take to maintain our integrity and reputation and help to protect you from personal liability. CPCCo is committed to the highest standards of ethical behavior, doing so earns the trust of our customer, our co-workers, and our stakeholders. We expect all employees to conduct business in a legal, ethical, environmentally responsible, and safe manner. This means we as a company must also uphold these standards and to hold ourselves and others accountable at all times. To this end, we must not retaliate against any employee for reporting issues or raising concerns. We are all expected to identify and report any of the following conditions: a violation or potential violation of CPCCo's procedures; conflicts of interest; fraud, waste, and abuse; safety concerns; violations of any criminal law, civil law, government regulation, or Federal Acquisition Regulations (FAR). Employees are encouraged to become familiar with the requirements by reading the references included in each applicable section of this document.

With so many aspects to consider when evaluating all these reporting requirements, it may seem overly challenging or even frustrating, which is why CPCCo provides numerous avenues for support. From your manager, Ethics Officer, Employee Concerns, Human Capital, Labor Relations, Legal, and Internal Audit staff, we are all here to support you!

We are contractually, procedurally, and morally responsible for breaches of our Code of Ethics and our commitments and as such corrective actions will be taken as appropriate to address these according to laws, regulations, disciplinary, or corrective action processes.

2.0 ROLES AND RESPONSIBILITIES

It is the responsibility of every employee to adhere to ethical policies, procedures, contract requirements, and the laws and regulations governing CPCCo's work for the government. Employees are required to participate in an annual ethics training session and are responsible to ensure training is completed in a timely manner annually.

2.1 Management

Managers and supervisors lead by example and commit to uphold the requirement to always exemplify and expect a positive work environment in which people are treated with dignity and respect and to demonstrate and expect ethical conduct from themselves and other employees. Furthermore, managers and supervisors are to promote a culture of integrity and accountability, helping their teams understand and comply with our Code of Ethics and Business Conduct Policy. Managers and supervisors should support and protect individuals who, in good faith, raise a concern or report potential unethical or non-compliant behavior and speak up when they hear

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024**

about or suspect potential misconduct. Managers should seek guidance from CPCCo's Ethics and Compliance, General Counsel, or Human Capital departments regarding matters requiring interpretation of laws, regulations, ethical conduct, or noncompliance with these requirements.

2.2 Ethics and Compliance

Ethics and Compliance, led by the Chief Compliance Officer, is responsible for oversight and coordination of the CPCCo's Ethics and Compliance Program. Ethics and Compliance provides guidance and assistance to management and employees in reviewing and resolving matters regarding ethics and compliant conduct in the workplace. The Ethics Officer also chairs the Ethics and Compliance Committee.

2.3 Legal General Counsel

The CPCCo Legal General Counsel provides legal support to CPCCo, including Ethics and Compliance and CPCCo's Board of Directors. CPCCo's Legal General Counsel staff provide counsel and guidance to managers, supervisors, and employees regarding compliance with, and legal interpretation of, laws, regulations, contracting requirements, and other legal matters.

3.0 POLICY

The company's commitment to managing our business according to our Code of Ethics is essential to continuing success as an enterprise. In any work environment such as ours, there is a need to establish Standards of Conduct. These standards help to provide a safe, pleasant, and orderly workplace for all employees, suppliers, and visitors. The Code of Ethics characterizes the values of all employees and allows us to perform our work with the highest standards of legal and ethical conduct.

Our Code of Ethics is meant to provide guidance regarding the principles outlined; however, one document cannot possibly address every law, rule, policy, or scenario we may encounter in our daily work, nor is it a substitute for exercising common sense and good judgment or seeking guidance when we need it.

To help determine whether a particular action is appropriate, ask yourself the following questions:

- Would my action(s) comply with the intent and purpose of CPCCo's policies, procedures, applicable laws and regulations, and Standards of Conduct?
- Would I feel comfortable doing this, or would it violate my personal standards of conduct?
- Is this action honest in all respects?
- How might this action affect others or the company?
- Would this action embarrass me, or CPCCo, if known to my coworkers, management, my family, my friends, or our customer?

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

As employees, we are entrusted with ensuring that the company’s operations reflect responsible business practices. Simply put, good ethics means good business. We must work honestly and with integrity – avoid even the appearance of anything improper or corrupt. The Code of Ethics is established to also protect you. It is the responsibility of every employee to read and understand the Code of Ethics and adhere to it. If not, you may have exposure to violations of the law or other non-compliances that result in disciplinary action, up to and including termination of employment. The company also expects its consultants, subcontractors, and other third parties to be aware of and adhere to these ethical standards. Failure to conduct business in an ethical manner may lead to reputational harm or contract violation resulting in termination or debarment.

Table 1 – What do I Need to Do?	
ALL EMPLOYEES MUST:	ALL SUPERVISORS/MANAGERS MUST (IN ADDITION):
<ul style="list-style-type: none"> <input type="checkbox"/> Perform everyday business and activities leading by example, demonstrating compliance with the standards of ethical conduct, as well as company policies and procedures. 	<ul style="list-style-type: none"> <input type="checkbox"/> Promote a culture of compliance in which Employees understand their responsibilities and feel comfortable asking questions or reporting suspected violations without fear of retaliation.
<ul style="list-style-type: none"> <input type="checkbox"/> Treat each other with dignity and respect. 	<ul style="list-style-type: none"> <input type="checkbox"/> Foster a spirit of ethics, integrity, and lawfulness by personally leading compliance efforts.
<ul style="list-style-type: none"> <input type="checkbox"/> Demonstrate our core values in everyday business and activities. 	<ul style="list-style-type: none"> <input type="checkbox"/> Never retaliate or tolerate retaliation, or the appearance of retaliation, against any individual for reporting suspected violations, even if they go outside of the chain of command.
<ul style="list-style-type: none"> <input type="checkbox"/> Become familiar with this Code as well as company policies and procedures. 	<ul style="list-style-type: none"> <input type="checkbox"/> Ensure that Employees understand that business results are never more important than ethical conduct and compliance with this Code.
<ul style="list-style-type: none"> <input type="checkbox"/> Comply with all local, state, and federal laws, regulations, ordinances. If any of these standards appear to conflict, discuss the matter with your Manager, Ethics & Compliance, Human Capital (HC), Labor Relations (LR), Employee Concerns Program (ECP), Legal General Counsel, U.S. Department of Energy (DOE), or DOE Office of Inspector General (OIG). 	<ul style="list-style-type: none"> <input type="checkbox"/> Promptly responding to alleged, or known, misconduct; contacting respective management, HC or LR, Ethics and Compliance, Legal General Counsel's office, or ECP resources for assistance.
<ul style="list-style-type: none"> <input type="checkbox"/> Not give gifts or other items of value expecting to obtain contracts or business or receive gifts or favors that may be seen as influencing your judgment as it relates to the performance of your duties for CPCCo. 	<ul style="list-style-type: none"> <input type="checkbox"/> Promptly responding to alleged, or known, misconduct; contacting respective management, HC, LR, Ethics and Compliance, Legal General Counsel's office, Employee Concerns or HC resources for assistance.

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

Table 1 – What do I Need to Do?	
ALL EMPLOYEES MUST:	ALL SUPERVISORS/MANAGERS MUST (IN ADDITION):
<input type="checkbox"/> Report time and expenses accurately.	<input type="checkbox"/> Understanding and applying the required elements for review and approval of requests or expenditure of funds before signing.
<input type="checkbox"/> Not use information obtained in confidence as employee of CPCCo for personal gain.	
<input type="checkbox"/> Never try to conceal a person’s failure to comply with a law, regulation, company policy, procedure, or Standards of Conduct.	
<input type="checkbox"/> Never ask or allow another party, such as an outside agent or subcontractor, to perform an action that a CPCCo employee is not permitted to do.	
<input type="checkbox"/> Report any questions, concerns, or suspected violations of the law, the company’s business practices or this Code of Business Ethics and Conduct to management or other appropriate authority.	
<input type="checkbox"/> Cooperate and provide complete and accurate information related to investigations of misconduct.	

3.1 Integrity

Integrity is indispensable to our mission. We shall act with honesty and adhere to the highest standards of ethical values and principles through our personal and professional behavior. We demonstrate our understanding of these values and principles and uphold them in every action and decision. We expect our actions to be consistent with our words, and our words to be consistent with our intentions.

The following principles set forth the standards for behavior that we must follow:

- Ethical behavior is the basis for everything that we do.
- We are committed to treating people fairly.
- Teamwork, mutual respect, trust, and open communication are the foundation of our culture.
- We strive to be a responsible corporate citizen in the community.

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

- We are committed to compliance with our contract, DOE Orders, the laws, rules, and regulations applicable to our business.
- We accept our responsibilities, share leadership in, and subject ourselves to the highest standards of public trust. We hold ourselves accountable for our words, our actions, our integrity, and honesty. Examples include (but are not limited to):
 - Owning our mistakes.
 - Being forthcoming and truthful in written and oral statements.
 - Integrity and honesty with exams, qualifications, or tests.
 - Integrity in procurement (Procurement Integrity Act).
 - Attendance at events associated with business travel such as meetings, conferences, and training.
 - Procedural compliance.
 - Good faith reporting of violations.
 - Exhibiting fiduciary responsibility when handling (e.g., authorizing, reviewing, approving) company and government funds including timekeeping, use of government resources, business expense reporting, and accountability.

3.2 Inclusion, Equal Employment, Nondiscrimination and Harassment Free

CPCCo is committed to a civil workplace where everyone is treated with dignity and respect. Our differing backgrounds, experiences, and perspectives give us the strength to lead and reflect our commitment to diversity. Our people expect this treatment and compliance to the law; therefore, we cannot tolerate discrimination or harassment in the workplace. We all have the responsibility to treat coworkers, applicants for employment, customers, and other stakeholders with respect and in a fair, non-discriminatory manner. CPCC POL-HR-11389, *Equal Employment Opportunity/Affirmative Action*

All employment decisions such as recruitment, hiring, classification, job assignments, benefits, training, transfer, layoff, recall, promotion, pay, testing, and termination are based on merit and business needs. Applicants for employment and employees are treated in accordance with state and federal laws and regulations that prohibit discrimination based on sex, age, ancestry, color, disability, marital status, national origin, race, religion, sexual orientation, gender identity, genetic history, physical or mental disability, pregnancy, citizenship, veteran status, or any other classifications protected by law.

A respectful workplace is defined as not engaging in or tolerating any form of harassment. Harassment is a form of discrimination and is unwelcome conduct that is based on race, color, religion, sex (including pregnancy), national origin, age, disability, or genetic information. It is unlawful where enduring the offensive conduct becomes a condition of continued employment, or the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. Offensive conduct may include, but is not limited to, offensive jokes, slurs, epithets, or name calling, physical assaults or threats, intimidation, insults, offensive objects or pictures, and interference with work performance. Harassment can occur in a variety of circumstances.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024**

Anti-discrimination laws also prohibit harassment or retaliation against individuals for filing a discrimination charge, testifying, or participating in any way in an investigation. Discrimination will not be tolerated in the workplace or during work-related social events.

If you feel you or someone else is being harassed or discriminated against, report your concerns to management, Human Capital, Labor Relations, Ethics and Compliance, Employee Concerns, or the General Counsel's Office. The company will investigate your concerns expeditiously and resolve them as soon as practically possible. CPCC-POL-HR-11387, *Workplace Harassment*

3.3 Duty to Report**3.3.1 Why is Reporting Important?**

It is important to raise concerns. Doing so reinforces our commitment to act ethically in every business decision we make. Early detection reporting to CPCCo allows us to address concerns before they become widespread problems, and to take corrective actions if necessary. Above all, we are committed to maintaining a safety conscious work environment; a culture where each of us feels comfortable asking questions, speaking up, and working towards solutions.

3.3.2 Do I have a Duty to Report?

Yes. All employees and subcontractors have the responsibility and duty to report all identified or suspected allegations of fraud, waste, abuse, misuse, corruption, criminal acts, and or mismanagement relating to DOE programs, operations, facilities, contract, or information technology systems to an appropriate authority (such as: supervisor, member of management, Ethics and Compliance, Employee Concerns Program, Human Capital, Labor Relations, Office of General Counsel, DOE, or DOE Office of Inspector General). CPCCo receiving organizations will do their utmost to provide follow-up information and outcomes as allowed by law.

No employee is authorized or required to carry out any order or request to conceal or cover up an unethical or dishonest business transaction. Any employee receiving such an order or directive must report it. Examples of issues to be reported are:

- Mismanagement ("Fraud") relating to DOE programs, operations, facilities, or information technology systems.
- Contract and procurement irregularities, such as cost, labor, or equipment mischarging.
- Falsifying time or expense sheets.
- Bribery and/or acceptance of inappropriate gifts.
- Conflicts of interest (either personal or organizational).
- Theft and/or abuse of government or company property.
- Non-reporting of an onsite vehicle accident (or off site with a government vehicle) or falsification of a vehicle accident report.
- Falsifying or directing another to falsify a document.
- Safety, health, and environmental protection non-compliances or violations.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024****3.3.3 CPCCo's Duty to Report**

In accordance with 48 CFR 52.203-13, "Notice to Supplier," CPCCo shall make a timely disclosure to the DOE Office of Inspector General in writing, with a copy to the DOE Contracting Officer (CO), of situations for which it has credible evidence of a potential violation of the civil *False Claims Act* (31 USC 3729) or federal criminal law involving fraud, conflict of interest, bribery, gratuity, or significant overpayments.

The Office of General Counsel should be contacted if there are any questions relating to the interpretation of laws or regulations, and their applicability to the operations of CPCCo.

3.3.4 Raising Concerns and Zero Tolerance for Retaliation

Employees are encouraged to resolve work-related issues and/or concerns with their immediate supervisor. However, all employees have the right to utilize any of the many avenues provided to address your concern. If you have a work-related concern, you may choose to first discuss it with your manager or the appropriate functional organizations including:

- Human Capital or Labor Relations
- CPCCo Employee Concerns Program
- CPCCo Employee Concerns Program Anonymous Hotline - 509-376-3999
- Office of General Counsel
- Environmental, Safety, and Health Professionals, or Subject Matter Experts
- Hanford Atomic Metal Trades Council (HAMTC) Stewards and Safety Representatives
- Employee Accident Prevention Councils
- Problem Evaluation Request (electronic) system
- Internal Audit
- Differing Professional Opinion Process (for environmental, safety, health, technical, and quality issues)
- Alternate Dispute Resolution Service (1-888-891-6149)

If you are not comfortable with going to your manager or believe that management has not taken the appropriate action, there are many alternate avenues for the reporting of concerns such as the Department of Energy ECP, Department of Energy Inspector General, or Amentum.

You may remain anonymous; if you choose this option, please leave as much detail as possible.

- DOE Employee Concerns Program Hotline – 509-376-1934
- DOE Office of Inspector General – 1-800-541-1625
- Amentum Ethics Hotline – 1-844-950-1964

Employees are protected by law when they raise a concern that they reasonably believe reveals actual or potential damage to the environment, public health or safety, and/or workplace safety, as well as actual or potential instances of waste, fraud, or abuse.

Should any retaliation by any employee be substantiated, the company will take prompt and appropriate actions, including disciplinary actions up to and including termination of employment.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024**

Any employee who believes they are being retaliated against for raising a concern, or who has any questions regarding the implementation of this policy, should contact the CPCCo Employee Concerns Program. CPCC-POL-HR-11388, *Open Door and Zero Tolerance for Retaliation*

CPCC and its employees working on this contract will be subject to the whistleblower rights and remedies in the pilot program on contractor employee whistleblower protections established at 41 USC 4712 by Section 828 of the *National Defense Authorization Act for Fiscal Year 2013* (Pub. L. 112-239) and FAR 3.908.

3.4 Ethics**3.4.1 Avoiding Conflict of Interest**

We all have a stake in acting in the best interest of the company. It is crucial that we avoid conflicts of interest, whether actual, potential, or perceived. Even the appearance of a conflict of interest could give rise to the perception that a conflict exists and may interfere with an individual's ability to make business decisions on behalf of the company. Conflicts can arise through many situations including: outside employment, financial interest in an outside business, customer and supplier relations, family relationships, household members, friendships, dating relationships, gift giving, charitable activities, and even public service.

3.4.1.1 Personal Conflicts of Interest

Personal Conflicts of Interest occur when one's personal or financial interests interfere with the ability to make objective business decisions on the company's behalf. It is required that conflicts are identified, declared, evaluated and, if required, mitigated.

A Conflict-of-Interest Disclosure form must be completed upon the start of employment, when changes in situations result in an actual or perceived conflict of interest, and annually thereafter. Examples of situations that may give rise to a conflict include the following:

- Employees who have, or are planning to start, an outside (non-CPCCo) business for profit.
- Any employment or other business relationship with competitors, suppliers, or customers, except for investments in publicly traded companies.
- Employees who hold or seek a term for an elected public office or serve on a Board of Directors.
- Employees who were former federal government employees must comply with federal laws established for the purpose of avoiding post-government employment conflicts.
- Situations where an employee would be in a direct reporting relationship to, or is a supervisor of, an individual who is a family member (see Note below) or with whom they are in a dating relationship. At times we may find ourselves working with family members or others with whom we have close ties. While this may not always result in an issue, it can in many cases lead to perceived favoritism. For this reason, an employee may not:
 - Hire, supervise, report to, review, or influence the job evaluation or compensation of another employee with whom they have a close personal relationship. Special

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

- circumstances or exceptions must be reviewed for approval by the Chief Compliance Officer.
- Participate in or make a procurement decision that could benefit themselves, a relative, or a friend.
 - Engage in an intimate or romantic relationship with a direct or indirect report or supervisor.
 - Managers and Supervisors are prohibited from dating or having a romantic relationship with subordinates within their organization (to include subcontractors). Violation of this policy may result in personnel actions being taken to mitigate the conflict. A Manager or Supervisor who engages in such a relationship without disclosing may face disciplinary action.

Note: Household Members/Family Members Include: employee, employee spouse, significant others, dating partners, child, parent, brother, sister, mother-in-law, father-in-law, sister-in-law, brother-in-law, daughter-in-law, son-in-law, roommates, cousins, aunts, uncles, or any other person where the relationship could lend itself to an actual, potential, or perceived conflict of interest. When in doubt, reporting is the best course of action.

Whether or not you believe you have a conflict to disclose, all employees, subcontractors, consultants, and other third parties must complete and submit a Conflict-of-Interest Disclosure form. You have a continuing duty to update this Disclosure as soon as facts or circumstances arise that could create an actual or perceived conflict of interest or could render a previous Disclosure invalid or incomplete.

Failure to disclose a conflict, either actual, potential, or perceived, may be determined to be misconduct and subject you to disciplinary actions up to and including termination.

3.4.1.2 Organizational Conflicts of Interest

Organizational Conflict of Interest means that because of other activities or relationships with other persons, a person is unable or potentially unable to render impartial assistance or advice to the government, the person's objectivity in performing the contract work is or might be otherwise impaired, or a person has or gives another organization or person an unfair competitive advantage. An unfair competitive advantage exists where a contractor competing for award of any federal contract possesses:

- Proprietary information that was obtained from a government official without proper authorization; or
- Source selection information (as defined in FAR 2.101) that is relevant to the contract but is not available to all competitors, and such information would assist that contractor in obtaining the contract.

Organizational Conflicts of Interest primarily arise because of one of the three situations:

- Biased Ground Rules: Situations in which an organization, as part of fulfilling a contract, has set the ground rules for another contract, for example, by writing the statement of work or the specifications. In these "biased ground rules" cases, the primary concern is that the

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

organization could skew the competition, whether intentionally or not, in its own favor. These situations may also involve a concern that the organization, by virtue of its special knowledge of the customer's future requirements, would have an unfair advantage in competing based on those requirements.

- **Impaired Objectivity:** Situations where an organization's work under one contract could entail evaluating itself, either by performing an assessment of work completed under another contract or by evaluating proposals. In these "impaired objectivity" cases, the concern is that the organization's ability to render impartial advice to the customer could appear to be undermined by its relationship with the entity whose work product is being evaluated.
- **Unequal Access to Information:** Situations in which an organization has access to non-public information as part of its performance of a contract and where that information may provide the organization a competitive advantage in a later competition for a second contract. In these "unequal access to information" cases, the concern is limited to the risk of the organization gaining a competitive advantage; there is no issue of bias.

You must also be careful to avoid Organizational Conflicts of Interest as the guidelines and restrictions for government procurement are very strict. We must never contract with subcontractors who have an unfair competitive advantage.

Your early identification and timely communication of potential conflicts of this nature allow us to continue to participate in new business opportunities and reinforce our intention to conduct business with integrity. CPCCo *Organizational Conflict of Interest Plan*

3.4.2 Time Reporting

We do not want to run afoul of federal regulations and laws; therefore, it is important that all employees and subcontractors are aware that timecard issues or falsification can be a federal crime or subject to personal civil liability. Under the *False Claims Act* (31 USC 3729), it is illegal for any person to knowingly present a false or fraudulent claim for payment or approval to the federal government; and it is illegal for a person to knowingly or should have known to make or use a false record or statement material to the payment of a false or fraudulent claim. Additionally, civil penalties ranging from \$11,181 minimum to \$22,363 maximum (i.e., 2018 data which is adjusted periodically for inflation) per occurrence exist under the *False Claims Act* for falsification.

The CPCCo time recording system is an essential part of the company's accounting and billing system as it reflects each employee's work charging and attestation to correctness. Employees and subcontractors are responsible to comply fully with CPCCo time recording procedures including:

- Accurately record time worked on a daily basis at the end of the day or in the morning for the previous day.
- Properly code time to the correct cost account (i.e., projects/activities worked).
- Report knowledge of falsified time sheets.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024**

Each employee is responsible for the information submitted on their timecard. By an employee's submittal and/or concurrences in the Time Information System (TIS), the employee affirms that the time and attendance data are true, accurate, and complete. When submitting time and attendance data, the employee acknowledges awareness and understanding of his/her responsibilities under applicable requirements. If the timecard is submitted by someone other than the employee, it is the employee's responsibility to review the timecard and make corrections if needed. Keep in mind this is your attestation for billing to the government or other entity which may come with personal liability and legal ramifications.

When a manager/approval delegate approves and/or concurs with submittals in TIS, he/she represents to the best of his/her knowledge and belief that the time and attendance data submitted are true, accurate, and complete and are in accordance with applicable requirements. When approving time and attendance data, the approving official acknowledges awareness and understanding of their responsibilities under applicable requirements.

Manager/Approval Delegates and Persons-in-Charge/Field Work Supervisors should have reasonable knowledge of the work performed and time spent by the employees/subcontractors on their associated tasks. Various techniques are available to obtain reasonable assurance including, for example, reviewing the employee's/subcontractor's work output or periodically calling or visiting the work site during the scheduled work period.

Compliance checks are unannounced reviews of timekeeping practices used to monitor controls. Finance staff conduct periodic reviews to ensure recording of labor hours is in accordance with applicable requirements. Employees are required to provide timekeeping-related information to these finance personnel, treat them with courtesy and respect, and answer all questions honestly.

3.4.3 Responding to Audits or Investigations

To protect you and CPCCo, employees are expected to fully cooperate with any legitimate internal or external auditors or investigators who request information in connection with our company. Always provide accurate and complete information. When responding to external information or audit requests, coordinate as appropriate with Finance, Internal Audit, or Legal General Counsel. In addition, do not attempt to improperly influence any auditor, regulator, or investigator, or encourage anyone else to do so.

You must never destroy or alter any documents or electronic records, lie to or mislead an investigator through commission or omission, or obstruct the collection of information that relates to an investigation, audit, or any legal action brought on behalf of, or against, CPCCo.

To the greatest extent possible, the company will cooperate with internal auditors or investigators or external government agencies responsible for investigating suspected violations of law and cooperate with outside audits/inspections/investigations to coordinate requests with appropriate CPCCo management or CPCCo organizations to determine legal and information disclosure.

3.4.4 Gifts, Gratuities, and Entertainment

When we are conducting business, all employees should be aware of limits to giving or receiving gifts and gratuities, and to entertaining clients or business associates. Federal rules are very

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

specific about how one can and cannot entertain federal employees. No offered or accepted gift should ever be allowed if it could in any way be perceived as a bribe or kickback. Seek advice from the Office of General Counsel if you have any questions.

3.4.4.1 Accepting or Offering Gifts to/from Subcontractors, Suppliers, Vendors, or Non-Federal Clients, Employees, and Officials

You may accept or offer gifts or entertainment to/from vendors designed to establish and maintain ethical business relationships (with your supervisor's approval), if the gifts or entertainment are nominal in value, not related to or the result of a purchasing decision, and with no expectation for any improper advantage or expectation that a business relationship will be unjustly influenced. Entertainment includes such things as business meals, attendance at sporting events, concerts, or similar functions. Do not accept or offer gifts, gratuities, or other items of value from any person or entity that result from a procurement decision, intending by such offer to affect your purchasing decision.

3.4.4.2 Offering Gifts to Federal Clients, Employees, and Officials

Federal regulations allow federal employees to receive "unsolicited gifts" having an aggregate value of \$20 or less (not to exceed \$50 in a single calendar year) subject to certain restrictions. The regulations also allow limited entertainment, including food and refreshments, of nominal value (again, \$20/\$50), e.g., entertainment at a hospitality room. However, under no circumstances may a gift—regardless of the value—be offered, or received, that is intended to influence an official action.

3.4.4.3 Political Contributions, Political Lobbying Activities

CPCCo respects the integrity of the political process; however, employee involvement and participation in the political process must be on an individual basis, on their own time, at their own expense, and without the use of government resources such as computers (e.g., e-mail), photocopiers, telecommunications equipment, or internet access. CPCC-POL-LEG-52808, *Political Contribution and Activity Policy*.

Keep your personal political activities personal – never pressure co-workers or business partners to contribute to, support, or oppose any political candidate.

You should be aware of U.S. and other country laws, such as the U.S. Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatments. Federal law prohibits the use of federal funds to influence, or engage a consultant to influence, an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress. Be aware that donations and sponsorships may present corruption risks. They could be perceived to seek or obtain an improper advantage. This applies in connection with the following:

- Award of any federal contract.
- Making of any federal grant or loan.
- Entering into any cooperative agreement using federal funds.

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

- Extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.
- Making a political contribution or offering company funds or other assets on behalf of CPCCo.

Political activities may not be conducted on CPCCo premises. You must be aware of, and avoid, conflicts of interest that can arise if you campaign for or hold public office or serve on commissions. You must exercise caution when accepting outside appointments, such as serving on a board of directors of any organization. If you plan to seek or accept a public office or serve on a board of directors for a company that does business with CPCCo, you must consult with the Office of General Counsel.

3.5 Fundamentals of Business Data and Information

All CPCCo employees and team members are required to ensure that all data and information is Current, Accurate, Complete, Repeatable, Auditable, and Compliant/Trustworthy with applicable governing requirements. This data and information condition is achieved through performance of validation checks, ensuring our data and information is trustworthy and can be reliably used by stakeholders to make informed decisions.

Data and information that contain anomalies (with respect to the core values in the paragraph above) must be identified and resolved (if possible) or reconciled to avoid any misrepresentation, misinterpretation, misunderstanding, or misuse of the subject data/information.

These business fundamentals apply to individually, organizationally, and/or system-generated data and information. Knowingly passing data, which is NOT Current, Accurate, Complete, Repeatable, Auditable, or Compliant/Trustworthy, or willfully bypassing/manipulating validation checks or the lack of validation checks, without full disclosure/identification/annotation is considered a violation of these “Ethical and Compliant Business Practices” found in this policy.

3.6 Your Signature

Your signature is a symbol of your own integrity and the integrity of CPCCo as a key control over the authorization of activities and or expenditure of funds. Your signature carries an underlying meaning, the documents you sign may be making promises or commitments on behalf of yourself, an organization, or our company. All signatures must be taken seriously: When you sign or initial your name you are attesting that you understand and concur with what you are signing. If you cannot confirm the information is true, accurate, and complete to the best of your ability, do not sign or approve it. When you do sign, sign your own name – never someone else’s. It is dishonest and unethical to sign your name to a false statement or certification.

When sending documents electronically or signing documents electronically (including submitting or approving your timecard), be mindful that electronic signatures are equivalent to handwritten signatures. When a signature is misused, it is considered falsification of records. The misuse will be dealt with as a violation of company policy and could be subject to disciplinary action, up to and including termination of employment, per our *Standard of Conduct*, A. Extremely Serious Misconduct, 5. Falsification of record or reports, including falsely reporting time worked. This includes conduct that demonstrates a disregard or indifference to whether a document, report, timecard (or equivalent), or statement contains false or materially misleading information.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024****3.7 Computer Usage**

All CPCCo's employees share an obligation to use the computer resources, networks, internet, and email systems responsibly and securely. These resources are provided for official government business purposes and are intended to be used for such. While CPCCo allows limited personal use as permitted by applicable DOE Orders and limited use policies, it must be kept to a minimum and not detract from our work.

Using government facilities or equipment for unauthorized, abusive, unethical, or inappropriate purposes will not be tolerated. Never overuse or abuse company assets for your personal use or gain or to conduct work on behalf of others. When taken too far, it can even be fraud or theft. You must also take care to avoid improper use such as:

- Frequent personal use that may cause congestion, delay, disruption of service to any government system such as streaming.
- Adding computer software or hardware on a CPCCo computer equipment without IT approval.
- Granting any third-party access to the network or information contained in our Datamart's, before confirming we have the right to do so, it is appropriate to do so, and the proper documentation is in place.
- Material that ridicules others based on race, creed, religion, color, sex, disability, national origin, or sexual orientation.
- Material that is illegal, inappropriate, or offensive to a reasonable person.
- Creating, downloading, viewing, storing, copying, or transmitting sexually explicit or sexually oriented materials.
- Fundraising, other than company sponsored (such as the United Way campaign).
- Lobbying or political activity.
- Any activity related to a personal business.
- Communicating official company business on behalf of CPCCo to external news groups, bulletin boards, or to other public forums without authority.
- Use of company-supplied computers to obtain protected information by accessing another computer without authorization can result in the imposition of civil and criminal sanctions.
- Releasing, not securing, or utilizing Personally Identifiable Information (PII) for unauthorized purposes.

The privilege of using government resources for personal use may be revoked or limited at any time if it is determined that the privilege, including noncompliance with software licensing obligations, has been abused or misused.

All other use of government resources for non-authorized or non-sanctioned activities is prohibited, may result in the activity being identified as an unallowable cost, and could result in disciplinary action, loss of employment, and/or criminal prosecution.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024****3.8 Confidentiality of Information and Records**

Keep our business and client information confidential. When in doubt, do not disclose information and guard against inadvertent disclosure.

Many facets of our operations are confidential or business sensitive. Improper disclosure can create serious financial or competitive losses or disadvantages to the company. In addition, such disclosure can result in legal liabilities to the company and individual employees. Examples include but are not limited to:

- Negotiations (including contract, procurement, and union, etc.)
- Financial data
- Work in progress
- Work methods
- Names of clients
- Public and private client agreements
- Personally Identifiable Information (PII)

We must never reveal confidential or business sensitive information to any outside parties unless we are properly authorized or legally required to do so. In addition, we may not disclose such information to our co-workers who do not have a legitimate “need to know.”

We also have a duty to protect employee information in accordance with applicable legal requirements. No one should access prospective, current, or former employee records without proper authority.

Individuals who generate, review, have custody, or otherwise has access to Official Use Only (OUO) or export-controlled information have the responsibility to identify, mark, and protect the information as appropriate. CPCCo employees must ensure we comply with our Record Retention Schedule work instruction before we destroy any records.

If you discover or suspect the unauthorized use or release of confidential information, notify management, Ethics and Compliance, or the Office of General Counsel immediately.

3.9 Traveling on Official Business and Expense Reporting

Employees planning official travel, including foreign travel, must process and report travel plans according to applicable travel and security procedures. CPCC-PRO-FM-40509, *Traveling on Official Business*

The company’s intent is that an employee does not lose or gain financially because of company business travel. While traveling on authorized business, employees are expected to spend the company’s money as carefully as they would their own and only incur reasonable and necessary expenses.

It is the responsibility of the traveler to have knowledge of the applicable per diem rates for the areas in which the travel will occur and to obtain government rates or rates which are comparable to government rates.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024**

Travelers must ensure that expense reporting is factual and represents allowable expenses incurred in performance of travel on company business. Travel expenses should be submitted promptly and will only be repaid according to procedure.

The traveler's manager is responsible for approving the travel and expense reports. ALL expense account reporting must be accurate and descriptive of the actual transaction. Never seek reimbursement for non-business expenses or duplicate reimbursements. Expense reports are CPCCo business records and must accurately and clearly represent expenses consistent with CPCCo expense reporting procedures.

3.10 Mail

Increased attention and caution are advised when opening mail received from unknown sources. If you suspect that mail contains any unknown substance or suspicious object, immediately call 911 or 509-373-0911 on a cell phone.

3.11 Specialty Rules for High Visibility Organizations**3.11.1 Accounting and Reporting**

Even if maintaining financial data is not your primary job duty, each of us contributes to record keeping in some form, such as completing timecards, submitting travel and expense reports, or keeping safety records. Honest and accurate accounting for costs incurred in the execution of our work is a paramount responsibility of everyone. This includes the responsibility to ensure allowable and unallowable costs for our CPCCo work are properly segregated. Proper accounting and compliance with accepted accounting principles and procedures is always required. This is all part of our fiduciary responsibility for company and government funds and assets.

We have established and maintained a system of accounting internal controls providing assurance that transactions properly and accurately reflect business and operations. The CPCCo accounting system meets the highest standards of honesty and integrity in accordance with generally accepted accounting principles.

Our approved accounting procedures are designed to meet federal and state accounting requirements. These procedures must be followed as applicable.

We commit to thoroughly collecting and accurately reporting our business and operations cost and financial information. It is every employee's responsibility to accurately and honestly account for costs in support of claims for project cost and schedule to ensure accurate representation of the variances. No false, artificial, or misleading entries shall be made in CPCCo financial records. No payment shall be requested, approved, or made with the intention that any part of such payment is to be used for any purpose other than that which is described in the documents supporting payment.

Employees are reminded that "allowable" costs include only those costs that are directly associated (i.e., within the contract scope) with the performance of CPCCo work and that are incurred in accordance with applicable laws and regulations. The Business Operations

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024**

organization should be contacted if there are questions regarding allowability or accounting for costs.

Information captured in the Business Management System (BMS) provides accurate and reliable records that are critical to meeting the financial, legal, and management obligations of CPCCo. All reports, vouchers, bills, payroll and service records, measurement and performance records, and other essential data should be prepared promptly, carefully, and honestly, and treated with discretion. Circumventing of internal controls is not tolerated. Our Internal Audit Department periodically audits CPCCo financial transactions and processes.

If you notice any accounting or auditing irregularities, or incidents of potential fraud, you should report your observation to management or the Office of General Counsel.

3.11.2 CPCCo Employees in Contracts or with Purchasing Authority

If you are employed by CPCCo in any part of the procurement function, including but not limited to, Cost Account Managers, P-Card holders, contract administrators Buyer Technical Representatives, Procurement employees, Buyers, or Material Coordinators, you **MAY NOT** accept any gift or gratuity from a supplier or vendor of any kind, including an invitation to a vendor-sponsored holiday party or golf tournament. All such gifts or gratuities must be disclosed to your supervisor in writing and should be reviewed by Ethics and Compliance or Legal General Counsel. Other items to consider when performing procurement activities are as follows:

- Practice due diligence in the selection of our suppliers, contractors, agents, consultants, and other business partners. Do business only with companies that meet our high standards and hold them accountable for assuring the quality of goods and services they provide us.
- Follow the requirements of our procurement manual to compliantly buy the items and services required under our contracts.
- Choose third parties carefully. We are responsible for actions they take on our behalf, so use due diligence in the selection process and monitor business partners closely to ensure they work honestly and with integrity.
- Never discuss, collude, or agree with third parties to “fix” or control prices, terms, or conditions.
- Never discuss, collude, or agree with third parties to restrict competition or dealings with supplies or clients.
- Never discuss, collude, or agree with third parties to divide or allocate clients, markets, or territories.
- Never discuss, collude, or agree with third parties to choose not to submit to bid, withdraw a bid, or submit an artificial bid to influence the outcome of a bidding process.
- If you have any reason to believe CPCCo is conducting business with an individual or company engaging in forced labor or human trafficking practices, report the misconduct immediately.

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

- Continue to properly monitor our business partners throughout our business relationship with them and apply the appropriate level of due diligence before entering a subcontract with them.

3.11.3 Purchasing Card (P-Card)

The Purchasing Card (P-Card) is used to simplify and streamline the acquisition process for small dollar procurements of goods. All employees who have been issued a P-Card must ensure that only legitimate and proper purchases are made consistent with CPCCo requirements. P-Card holders must exercise prudence and integrity in the management of resources in their custody and in all fiscal transactions in which they participate and not knowingly be party to or condone fiscal misconduct. They must expose corruption whenever discovered and protect privileged or confidential information to which they have access by virtue of their position.

Employees shall not use a P-Card to purchase special or prohibited items without prior deviation approval from P-Card Administration. CPCC-PRO-AC-335, *Use and Control of Purchasing Card*

CPCCo will treat misuse as a violation of the Code of Business Ethics and Conduct, and when appropriate, refer such misuse to law enforcement officials or the Office of the DOE Inspector General for further investigation/prosecution.

P-Card holders have strict rules that they must follow. Do not ask a card holder to make purchases outside of procedure or fraudulently.

3.12 Safety

3.12.1 Commitment to Safety

Everyone who works for or with CPCCo knows that safety is our hallmark. Our reputation depends on our continued pledge to the safety and welfare of our employees, customers, vendors, and subcontractors. Providing a safe and secure work environment gives us a competitive advantage in attracting the best applicants and retaining our valuable workforce. We are committed to the highest standards in safety and health performance and to be a model of excellence in the performance of safe, quality work. This requires conviction and dedication in how we approach our work, balance our priorities, how innovative we are in our work processes, and how we care for ourselves and our fellow workers. This dedication should never promote intimidating behavior, threats, or acts of violence in our workplace. The safety and health of our employees will take priority whenever conflicts with production or other objectives occur. Being safe at work includes a workplace that is free of threats, violence, drugs, and alcohol. CPCCo employees are offered Employee Safety Advocate Forums to engage in monthly through planned activities and monthly meetings. Examples of safe work behaviors or practices are as follows:

- Never participate in horseplay of any kind while on the job or on company premises.
- Familiarize yourself with the standards and specifications that apply to the projects you work on and follow company guidance designed to protect the quality of safety or our products and service.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024**

- Ensure that any quality testing, inspections, or programs, as required, are properly conducted and documented.
- Wear all furnished personal protective equipment (PPE) and installed seat belts and shoulder harnesses when operating equipment, in accordance with manufacturer's instructions, applicable regulations, and company policy. Always inspect equipment before each use.
- Do not remove, damage, disable, or make ineffective any protective safety equipment or first aid equipment.
- Report, remove from service, or have repaired any tool or equipment that is damaged, not working properly, or may otherwise be hazardous to use.
- Only operate, perform maintenance of, or repair equipment if properly trained and/or certified to operate, maintain, and/or repair the equipment.
- Operate all vehicles and equipment in accordance with applicable regulations and manufacturer's instructions.
- Complete all safety training required for your job function or task, including training that is specific to tools, equipment, or vehicles to be used.
- Always maintain good housekeeping, keeping work areas neat, clean, and free of hazards, and heed all warning signs and posted safety instruction.

You should report any violations of health, safety, and environmental protections, policies, or potential hazards to your supervisor, manager, or safety and health professional.

3.12.2 No Weapons or Workplace Violence

Weapons are not allowed in the workplace. Acts of violence, as well as threatening remarks or gestures, conspiracy to act, or other disruptive behavior in the workplace are unacceptable. This includes intimidation, stalking, bullying, or any physical act of violence. This expectation of ethical and civil behavior applies when you are on company business in any capacity, both on and off site.

3.12.3 Drug and Alcohol-Free Workplace

The company prohibits the possession, use, dispensing, distribution, manufacture, sale, or presence of any intoxicants, alcohol, narcotics, hallucinogenic, depressants, stimulants, or other such drugs (e.g., controlled substances, except where legally prescribed) anywhere on the Hanford Site or any company or government location.

Additionally, we require employees and subcontractors at a work location or on the job to come to work free from the negative effects of drugs or alcohol and be able to safely perform all their job duties. To help employees comply with our commitment to a safe and drug-free workplace, employees are encouraged to seek assistance to overcome drug or alcohol dependency or addiction through the Employee Assistance Program.

If you believe you are subject to or witness inappropriate, unsafe conduct, you must report it as soon as possible to a supervisor/manager, Hanford Security, Human Capital, or any member of

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

senior management. If you ever face an immediate threat to your safety or that of your colleagues on the Hanford Site, call 911 immediately. If you have a cellular phone and you need onsite emergency assistance, dial 509-373-0911. DO NOT hang up if you accidentally dial 911 from your cell phone. Simply explain the situation to the emergency dispatcher. If you have a non-emergency to report, e.g., theft or a security concern/observation, contact the Hanford Patrol Operations Center (POC) at 509-373-3800, and then report the incident internally.

CPCC-PRO-HR-042, *Fitness for Duty*, provides instructions for the implementation of this drug and alcohol-free policy.

3.12.4 Protect Government Property

All employees and subcontractors are responsible to use government resources to carry out our CPCCo government business and protect it from loss, theft, fraud, unauthorized personal use, negligent misuse, and destruction. CPCC-PRO-PMT-52772, *Property Management*

All employees using government property are expected to be accountable for the proper utilization, care, and control of government property (resources) within their custody and/or organization. All government property under CPCCo's control is to be managed in accordance with contract regulations and directions, sound industry practices, and generally accepted accounting principles.

These government resources include: the buildings and properties we work in, the technology that connects us to others, the ideas we develop, and the vehicles, tools, computers, and mobile devices we use to accomplish our work.

Management control of government property is initiated promptly upon receipt. Government property that is sensitive (e.g., computers, laptops, tablets, digital cameras >\$1,000, etc.) and/or property that has value greater than \$10,000 is marked or tagged for identification and recorded in the CPCCo property system, assigned a custodian and location, and tracked for accountability and financial purposes in accordance with government requirements. This applies to government-owned facilities and equipment assigned to CPCCo and its subcontractors.

All Property Administrators, Custodians, and/or users of government property are responsible for providing the location and status of tagged property at the request of Property Management to support assessment and inventory requirements.

All employees shall immediately report any missing, damaged, or destroyed government property to their manager, the Property Management Department, or to the Legal General Counsel. This includes specified instances of loss, damage, theft, or destruction of government property, including buildings, facilities, equipment, instruments, tools, materials, supplies, and government vehicles.

All employees should identify property that is no longer necessary to perform contract work to their manager or the Property Management Department as soon as it becomes known so property can be reutilized or transferred for disposal.

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024****3.12.5 Environmental Stewardship**

CPCCo is an active steward of the environment and conducts business in an environmentally responsible manner. All employees and CPCC team members are expected to conduct business by planning and conducting work with the objectives of continual improvement, environmental stewardship, integrity, accountability, and transparency. These objectives shall be met through regulatory compliance, environmental sustainability, life cycle considerations, and environmental risk management.

The company endeavors to comply with all laws and regulations impacting environmental quality as well as health and safety requirements. We have a commitment to perform work through methods that meet or exceed federal, state, and local environmental requirements, assure the safety and health of workers and the public, and achieve the highest levels of quality. All aspects of work planning and execution by CPCCo are to be performed within the structure of the Environmental Management System (EMS), an integral component of the Integrated Safety Management System (ISMS).

The intended outcomes of the CPCCo Environmental Management System are the accomplishment of environmental cleanup activities within CPCCo's scope of work and the commitments reflected in CPCC-POL-EP-5054, *Central Plateau Cleanup Company Environmental Policy*, including:

- Safely and sustainably protection of workers, the public, and the environment while meeting environmental cleanup goals.
- Minimization of environmental impacts related to CPCCo activities.
- Compliance with all other environmental obligations.
- Establishment of objectives and plans to achieve them for environmental improvement.
- Measurement and continual improvement of environmental performance.
- Emphasis of pollution prevention including the efficient use of resources.
- Identification of potential actions to reduce the company's carbon footprint and greenhouse gas emissions.
- Integration of sustainability into work planning, decision-making, procurement, design, training, and daily work activities.
- Mitigation of existing and anticipated adverse environmental conditions.
- Assessing, reporting, and seeking to correct environmental incidents and deficiencies.
- Communication of information regarding environmental performance to all stakeholders.
- Ensuring all CPCCo workers are aware of and adhere to CPCC-POL-EP-5054.

3.12.6 Security and Safeguards

Not only does every employee have a duty to protect government property but they also have the duty to protect and secure controlled use information from internal and external security threats,

Code of Ethics and Business Conduct Policy**Published Date: 07/03/2024****Effective Date: 07/03/2024**

and to report any breach of security to their supervisor or Hanford Site security personnel. You can do your part to keep our resources secure by:

- Wearing your badge and challenging those without it.
- Reporting suspicious or unusual activity or inquiries for information.
- Keeping computer and mobile devices physically and electronically safe.
- Locking your workstation when stepping away by using strong passphrases.
- Taking time to review emails before clicking on links or attachments.
- Properly protecting and securing Logical Access Control System (LACS) cards.

In addition,

- If you are required to obtain and maintain any form of clearance, you are expected to be knowledgeable of all responsibilities and obligations related to that clearance.
- Never discuss proprietary or confidential information in a public place where outside parties can overhear you.
- Do not post any comments or documents about CPCCo on any social media sites such as social networking sites, photo or video sharing sites, blogs, wikis, or other bookmarking sites –negative or positive–that are confidential or could be attributed to our company.
- You should not copy articles, data, photographs, music, videos, or software without obtaining the required authorization from the author or owner.
- Remember that in addition to protecting the proprietary information of CPCCo, we must also safeguard the proprietary of information of our customers, partners, and other third parties, as well as the personal information of our employees.
- Never seek to obtain or use competitors confidential or proprietary information when conducting CPCCo' s business and immediately report any accidental receipt of or offer to provide such information to Legal General Counsel.
- Be cautious about requests from friends or family for information regarding companies that we do business with or have confidential information about—even casual conversations could be viewed as illegal “tipping” of inside information.
- If you attend trade association or industry conferences, exercise particular caution and do not discuss anticompetitive topics with a competitor, such as pricing information.

The obligation to protect company proprietary information continues even after your employment ends with CPCCo.

3.12.7 Report Security Events

Immediately report possible security incidents to the Patrol Operations Center (POC) at 509-373-3800. The POC will make all other necessary notifications and dispatch Hanford Patrol to investigate if the situation warrants. These incidents should also be reported to your immediate supervisor and CPCCo Security.

Code of Ethics and Business Conduct Policy

Published Date: 07/03/2024

Effective Date: 07/03/2024

4.0 FALSIFICATION OF RECORDS OR REPORTS IS CONSIDERED EXTREMELY SERIOUS MISCONDUCT. EMPLOYEES MUST REPORT ANY FALSIFICATION OF REPORTS OR RECORDS TO CPCCO LEGAL GENERAL COUNSEL'S OFFICE.SOURCES**4.1 Requirements**

DEAR 952.209-72, Organizational Conflicts of Interest (Aug 2009) – Alt. I (Feb 2011)
DOE O 221.1B, *Reporting Fraud, Waste, and Abuse to the Office of Inspector General*
DOE-0400, *Hanford Site-Wide Employee Concerns Program Procedure*
FAR 52.203–13, *Contractor Code of Business Ethics and Conduct*

4.2 References

31 USC 3729, *False Claims Act*
48 CFR 52.203-13, "Notice to Supplier"
CPCC-200020, *Organizational Conflict of Interest Management Plan*
CPCC-POL-EP-5054, *Central Plateau Cleanup Company Environmental Policy*
CPCC-POL-HR-042, *Fitness for Duty*
CPCC-POL-HR-11387, *Workplace Harassment*
CPCC-POL-HR-11388, *Open Door and Zero Tolerance for Retaliation*
CPCC-POL-HR-11389, *Equal Employment Opportunity/Affirmative Action*
CPCC-POL-LEG-52808, *Political Contribution and Activity Policy*
CPCC-PRO-HR-042, *Fitness for Duty*
CPCC-PRO-AC-335, *Use and Control of Purchasing Card*
CPCC-PRO-FM-40509, *Traveling on Official Business*
CPCC-PRO-PMT-52772, *Property Management*
DOE P 444.1, *Preventing and Responding to All Forms of Violence in the Workplace*
FAR 2.101, "Definitions"
FAR 3.908, "Pilot program for enhancement of contractor employee whistleblower protections"

4.3 Bases

5 CFR 2635, "Standards of Ethical Conduct for Employees of the Executive Branch," Subpart B, "Gifts from Outside Sources"
18 USC §1030, "Fraud and Related Activity in Connection with Computers"
FAR 3.104, "Procurement Integrity"