

Business Conduct and Ethics Expectations For Suppliers and Contractors

SAFETY | INTEGRITY | TEAMWORK | EXCELLENCE

Fluor-BWXT Portsmouth LLC (FBP) has always had an absolute determination to do the right thing. In all of its dealings, FBP is committed to unyielding integrity and the highest standards of business conduct. This commitment is integral to FBP's continued success, and we believe it positively impacts our suppliers, contractors, customers, employees, and the communities where we do business.

FBP seeks to conduct business with businesses who share our values of safety, integrity, teamwork, diversity, mutual respect, and excellence, and the principles expressed within our Code of Business Conduct and Ethics Policy (the Code). The most current version of the Code is available at <https://www.fbportsmouth.com/working-with-us/documents/contract-documents.htm>.

FBP's suppliers and contractors are expected to meet these expectations and, in turn, require their suppliers and subcontractors to demonstrate these values and principles as well. Mutual success and continuing business relationships depend on it.

FBP reserves the right to verify that a supplier or contractor's business operations comply with these essential business principles.

FBP expects suppliers and contractors to maintain and enforce policies requiring adherence to best commercial and lawful business practices that encompass ethical expectations.

Fluor-BWXT | Portsmouth

Health, Safety & Environmental (HSE)

The health and safety of all personnel associated with our work is our highest priority. FBP's suppliers and contractors are expected to:

- Provide a safe and healthy work environment that supports accident prevention, minimizes exposure to health risks, is in compliance with applicable workers' health and safety laws, and reduces harmful impacts to the surrounding community
- Apply safe work practices (including regulatory and contract-specific requirements) to all their activities and instill safety in every aspect of their work processes and in the attitude and behavior of all their workers
- Conduct their operations in an environmentally responsible manner and in accordance with applicable environmental laws.



Financial and Operation Controls

FBP suppliers and contractors are expected to:

- Keep accurate, complete, fair, timely, transparent, and understanding financial and operation books, records and accounts and a system of effective internal controls
- Create, retain, and dispose of business records in accordance with best commercial business practices and any applicable legal and contractual requirements that may be flowed down to your company through FBP Purchase Orders and Subcontracts
- Keep accurate and complete records for all FBP procurement and subcontract actions, and as may be applicable by contract, including records of work time and expenses charged to FBP
- As may be flowed down by contract, protect nonpublic information relating to FBP and/or the United States Department of Energy.





Conflict of Interest, Gifts, Entertainment, and Business Courtesies (COI)

Our suppliers and contractors, their employees, and their family members must not receive improper benefits through their relationship with FBP or allow other activities to conflict with their FBP contracts. FBP does not encourage the use of gratuities, promotional items or entertainment activities. Our suppliers and contractors are expected to:

- Limit promotional items and entertainment involving our employees to reasonable business courtesies within accepted business practices and never with the intent to improperly influence a business decision or create a potential conflict of interest or the appearance of impropriety
- Disclose any potential conflict of interest or contractual business relation with FBP's employees and family members to their FBP Supply Chain representative for review prior to entering into any business transaction.

Competing Fairly

FBP believes in the competitive market system where merit, quality, price, and other objective factors determine who is awarded the materials and/or services work by FBP. Our suppliers and contractors are expected to:

- Compete honestly and fairly
- Comply with applicable antitrust and competition laws
- Never participate in anti-competitive practices such as price fixing or bid rigging



Government Work

As suppliers and contractors who provide support to FBP's work on the Department of Energy's federally funded Projects here at the Portsmouth Site, you are expected to sound understanding of Government acquisitions and contracting laws, rules, regulations and procedures.



Anti-Bribery and Corruption

FBP maintains zero tolerance for bribery and expects our suppliers and contractors to do the same. Bribery is directly or indirectly giving or promising to give anything of value to improperly influence actions of a third party. Bribes may include money, gifts, travel or other expenses, hospitality, below-market loans, discounts, favors, business opportunities, political or charitable contributions, or any direct or indirect benefit or consideration. We expect suppliers and contractors to remain in compliance with all relevant anti-corruption laws in addition to FBP's contract terms and conditions related to anti-bribery and corruption.



Reporting Concerns

FBP's suppliers, contractors, and their employees should promptly report any business conduct and ethics concerns involving or affecting FBP, whether or not the concern involves the supplier or contractor, by contacting one of the following:

- FBP's Compliance, Ethics & Employee Concerns HOTLINE: 1-844-279-1102. Available to take your calls 24 hours/day, 7 days/week. You may report a concern without providing any personal information if you prefer.
- FBP's Employee Concerns Designated Phone: 740-897-2222
- FBP's Compliance Manager: 740-897-3246
- FBP's General Counsel: 740-897-2676

The FBP Compliance Ethics & Employees Hotline is a way for FBP employees, suppliers, contractors, and others to report activities that may involve illegal or unethical conduct or violations of these expectations or FBP's Code "without any fear of reprisal".

A supplier or contractor may also be requested to assist FBP in the investigation of any ethics concern involving FBP and the supplier or contractor. FBP policy prohibits retaliation against any person reporting an ethics concern.

Remember, it's each of our responsibility to report suspect and/or unethical activities. It's the right thing to do to protect "our" taxpayer dollars.