

# Doing the right things

 **Sellafield Ltd**

We are creating a clean and safe environment  
for future generations



Code of responsible business conduct

December 2022

Enter here >

It's all about our integrity - doing the right things, openly and honestly.

Find out more >

**We all have a role to play in leading by example.**

This could either be through managerial responsibility or through the standards we uphold in our day to day roles. We all have the responsibility to be a good role model, to support each other and to promote a culture of honesty, integrity and equality through our behaviours and the decisions we make.

Sellafield Limited's Code of Responsible Business Conduct is designed to be a starting point, a guide to help you when faced with difficult decisions. It shows who we are and what we value. By thinking, working and behaving in the manner outlined in this Code, we will all contribute to our shared success. This sits alongside the NDA's group wide Code and demonstrates a shared commitment to our manifesto and nine behavioural themes.

This is an interactive document. If you need further information on a particular topic, you can click on the relevant links which will lead you to pages with additional information or scenarios. You can also reach out to the contacts listed in the 'Getting help and reporting concerns' section.

We are always looking to improve this Code and make it more helpful to you. If you have any ideas on how it could do this, we want you to let us know. This could include improvements to existing topic area guidance, or the inclusion of new topic areas. Please contact the Conduct Compliance Office with your ideas, contact details can be found in the 'Getting help and reporting concerns' section towards the end of this document.

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# Responsible business conduct is about an attitude of mind, just like our manifesto.

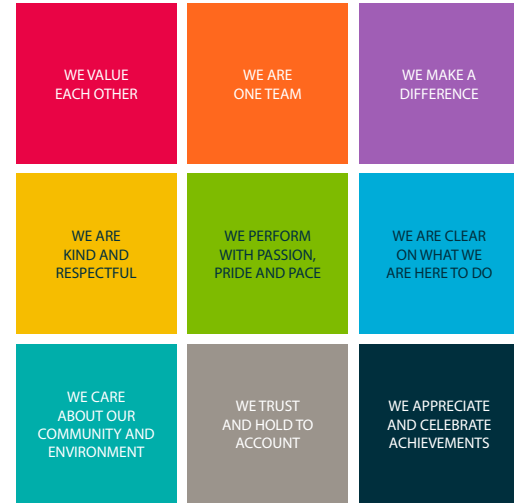
Whilst this Code sets out our expectations of everyone, we place a particular expectation on those in management roles to lead by example, set out and demonstrate high standards in your teams, as well as to provide help and support to others in the workplace.

This includes:

- Helping others to understand their responsibilities
- Behaving ethically and with integrity in everything that you do
- Communicating clear expectations
- Enabling individuals to do the right thing
- Listening to your team's thoughts and concerns

We are  Sellafield Ltd

We are creating a clean and safe environment for future generations



We are nuclear professionals in everything we do

Whether we are Sellafield employees or in the supply chain working on Sellafield's behalf, we're all accountable for **behaving responsibly, ethically and legally in every aspect of our daily work.**

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All it takes is to ask yourself a few simple questions:



What might the media say if it knew, and how would I feel about explaining it?



Does what I am doing call my own integrity, and that of the company's, into question?



Would I be happy to explain what I am doing to family or friends?



How would I feel if someone else was doing what I am?



Would I be happy to explain what I am doing in public?



Am I setting a good example to others?



Consider any additional information around ethical based decisions.

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# It covers 7 areas, click any:

For more information please  
click inside the area circle...



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# Safety, Security and the Environment

Safety and security are at the heart of everything we do to protect our people, the public and the environment. Without delivering on this priority, we will lose trust, and with that, the right to operate this business. We are all personally accountable for delivering our work safely, securely and in an environmentally responsible way, and leaders in particular are accountable for setting clear direction, leading by example and demanding the highest standards in these respects.



We believe:

- Safety, security and environmental protection are everyone's personal accountability and are delivered through personal ownership and action
- All events or incidents leading to injury are preventable
- Managers and supervisors must lead by example, setting clear direction and coaching so we all achieve the highest standards
- Excellence in safety and security is achieved by our employees, contractors and suppliers all working together towards shared goals.

Make sure you follow procedures correctly, challenge unsafe practices and behaviours, and report concerns promptly.

Most importantly, intervene if someone is putting themselves or others at risk - if an incident were to occur, don't find yourself saying 'if only I'd done something to prevent it' afterwards.

Any safety and security information you require will be available via your line manager or the Sellafield Ltd Management System.

Personal conduct ➤

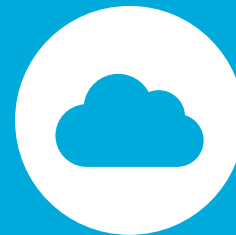
# Personal conduct

Find out more >

Responsible business conduct starts with [each of us](#). We all have a duty to conduct ourselves in an ethical and professional manner, in compliance with the law and our policies. Whether it's our commitment to cyber-security; our use of social media; not abusing drugs or alcohol; keeping ourselves and others safe; avoiding conflicts of interest; or preventing fraud and theft; or any other business activity, we all set and maintain the standards of our personal conduct. By trusting each other to behave in this way, we will all be able to perform at our best.



If you're concerned or have any questions about any of these issues, or would like further advice on how they apply to you personally, you can discuss them with the Conduct Compliance Office, contact details can be found in the 'Getting help and reporting concerns' section of this guide.



How we treat people >

# How we treat people

Find out more >

We are kind and respectful of each other. We believe everyone should be able to bring their own strengths and experience to contribute to our mission, which is why we promote equal opportunity, diversity and inclusion across our organisation. Everyone has a right to be treated with dignity and respect, and so we demand a workplace which is free of any form of discrimination, harassment or bullying.

By working for or with Sellafield Ltd, it is your responsibility to ensure this **positive environment** is encouraged and maintained.

This inclusive ethos applies to how we treat people both within Sellafield and external to Sellafield, such as our stakeholders and communities.



For further information, or to report any concerns you may have about the above topics speak to your HR Business Partner or the Conduct Compliance Office. Contact details can be found in the 'Getting help and reporting concerns' section of this guide.'

Working with our partners >



# Working with our partners

Find out more >

**We cannot deliver our mission on our own.**

We deliver our mission as part of the NDA group and via partnerships with other organisations. Our regulators, supply chain, and wider stakeholders all contribute. Without them, we cannot achieve this. It is therefore crucial that we create and maintain these relationships in an open, fair and honest way, promoting a culture of mutual success.

Behaving in line with our manifesto and nine behavioural themes is critical to this. We will never give or accept bribes, illegal payments or inappropriate gifts or hospitality (Click 'Find out more >' on the left for further information on gifts and hospitality). Everyone involved in these partnerships at any level has a responsibility to ensure fair and open competition and transparency in our business dealings.

Put simply, we have zero tolerance for any corrupt practices.



We will act appropriately and lawfully in our external interactions. If you feel that something fraudulent, corrupt or in any way unlawful is happening, you must report it immediately. This may be directly to the Conduct Compliance Office or through Safecall - our confidential 3rd party reporting service. If you are concerned about a possible conflict of interest, contact the Conduct Compliance Office. Contact details can be found in the 'Getting help and reporting concerns' section of this guide.



Working with our communities >

# Working with our communities

We are, and will continue to be, **committed to developing the communities** where we work. We are working to deliver the maximum social impact from the public money that we spend at Sellafield Ltd each year. Our social impact strategy is designed to create shared value for all of our stakeholders: the taxpayer, government, NDA, local authorities, our supply chain and the communities in close proximity to our sites.

It's about growth in the capacity, diversity and capability of our local economies and supporting sustainable activities in the local community that create self-reliance and independence. It's about increasing the impact, scale and duration of our supply chain activities on the local economies and improving their collective impact in our communities. It's about each of us thinking about how we can maximise the social impact of all that we do here in Sellafield Ltd.



To discuss anything regarding our social impact activities, please get in touch with anyone from our social impact or corporate affairs team. Their email address is: [socialimpact@sellafieldsites.com](mailto:socialimpact@sellafieldsites.com)



Getting help and reporting concerns >

# Reporting concerns

In detail

Reporting concerns helps us maintain a culture of integrity, in which we trust and hold each other to account.

If anyone is found to have retaliated against an employee for raising concerns, they will face disciplinary action.

If you have experienced, witnessed or suspect any kind of wrongdoing in the workplace, including unethical or illegal behaviour, the best thing for you and the company is to speak up and report it.

Please use any of these reporting routes:

Oliver Dior, Conduct Compliance and Corporate Investigation Manager

Phone: 07815 994291

Email: [oliver.dior@sellafieldsites.com](mailto:oliver.dior@sellafieldsites.com)

Email: [conduct.compliance@sellafieldsites.com](mailto:conduct.compliance@sellafieldsites.com)

Michael Sewell, Conduct Compliance Officer

Phone: 07890 400784

Email: [michael.p.sewell@sellafieldsites.com](mailto:michael.p.sewell@sellafieldsites.com)

Email: [conduct.compliance@sellafieldsites.com](mailto:conduct.compliance@sellafieldsites.com)

HR Advice and Case Coaching

Email: [people.operations@sellafieldsites.com](mailto:people.operations@sellafieldsites.com)

Your Line Manager or local HR Business Partner

Data Protection Team

Email: [data.protection.team@sellafieldsites.com](mailto:data.protection.team@sellafieldsites.com)

Or you could call Safecall - the Sellafield Ltd external reporting line. Safecall is a confidential, and (if required) anonymous helpline to report concerns.

Phone: 0800 915 1571

[www.safecall.co.uk](http://www.safecall.co.uk)



Your responsibilities >

# Getting help and reporting concerns

Find out more >

We conduct our business *openly, legally and with integrity*. To continue this, it is crucial that everyone employed by Sellafield Ltd or working on our behalf knows where to go for help or advice. You are empowered to raise concerns knowing that they will be treated seriously, and where necessary, acted upon. Where you see or suspect unlawful activity in our business you must report it. We are committed to ensuring that reporting a concern is not itself a cause of anxiety or fear. We do not tolerate retaliation, victimisation, or discrimination against employees who raise concerns.

## Getting help and support

Please access help from the following support routes:

- HR Contacts
- Trade Union Key Contacts
- Diversity & Inclusion Networks
- Employee Assist Programme  
(The EAP is available 24 hours a day, 365 days a year)

Reporting concerns >

# Your responsibilities

The attitudes, behaviours and expectations outlined in the Code, and contained in our existing policies and procedures, are key to the success of our business and our position in the local community. They describe who we are, and all Sellafield Ltd employees, from our Board and executive team down, are expected to uphold them in line with the law and our other obligations.

Be a role model and exhibit the right ethical behaviours in everything you do.

If you are unsure how to respond in a difficult situation, the Code is here to guide you. If you see or suspect any breaches to the Code or any company policies, at any level, report them via the channels outlined in this Code. You can be assured that the matter will be taken seriously and where required, investigated. Reporting concerns is a key part of driving the right ethical behaviours of a business..

When matters are investigated, you are expected to co-operate fully and honestly with any internal investigations being carried out in relation to suspected breaches.

