



Sellafield Ltd

Sellafield Ltd Company Policy

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Issue 3

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This Sellafield Ltd Policy is approved by the SL Board; it represents the SL Board's direction to the business on this topic. Compliance with this policy is mandatory through aligning Sellafield Ltd Management System processes and people behaviours to the commitments below.

Conduct and Compliance Policy

Policy Statement

Sellafield Ltd will conduct its business in an honest, ethical and legally compliant manner in accordance with the company's values and Code of Responsible Business Conduct. We are committed to acting fairly and with integrity in all our business dealings and relationships wherever we operate, including in relation to our corporate and social responsibilities. We shall not allow unfair, inequitable or biased behaviours to develop because of conflicts of interest and we shall manage our business dealings to avoid such conflicts of interest arising.

Commitments

We shall be a Company that:

- upholds, and as a minimum complies with, all UK and International laws and regulations relevant to our activities
- operates in accordance with our Articles of Association, established business purposes, Policies and practices
- sets out our responsibilities, and those of employees and subcontractors working for us, in observing and upholding our values in compliance with legislation, regulations, labour standards and ethical conduct
- implements and enforces effective systems to require compliance with our legal and regulatory obligations and ensures that timely legal advice is taken when necessary
- only engages external legal advisors through the Head of Legal Services or his nominee
- requires that employees within Sellafield Ltd seek appropriate legal advice from the Head of Legal Services or his nominee.
- provides information and guidance to workers on how to recognise and deal with actual or potential non-compliances with legal requirements or other inappropriate behaviours
- requires that employees, or persons acting on their behalf, do not engage in conduct or activity that may raise questions as to the company's integrity, impartiality or reputation
- proactively seeks to identify and prevent unlawful or unethical behaviours through auditing, assurance reviews and training
- takes prompt action to respond to any actual or potential unlawful or unethical conduct including by implementing corrective actions
- where such potential non-compliances include fraud, bribery or corruption, ensures that these are investigated or overseen by Internal Audit
- proactively avoids conflicts of interest by means of appropriate awareness, practice and guidance
- provides training and oversight to prevent and conflicts of interest
- provides advice and support to manage potential conflicts of interest

Failure to comply with the requirements of SL Policies will constitute a disciplinary offence and/or may result in disciplinary action or dismissal and/or permanent removal from sites operated by Sellafield Ltd.