



Code of Conduct

Doing the right thing



Magnox

Let's do the **right** thing



I am proud of the work we do. I'm equally proud of the commitment we've made to the health, safety and wellbeing of our employees, the people in our supply chain who support us and those who live in the communities surrounding our sites and offices.

Our Code of Conduct provides the living framework that embodies our ethics and values. The ways in which we deliver are as important to Magnox and the wider NDA Group as what we deliver. Doing the right thing, in the right way, must be at the heart of our approach

to all our work.

We each have a role to play in upholding the words and spirit of this Code. We share a responsibility to be a good role model, to

support one other and to promote a culture of honesty, ethics, integrity, sustainability and respect through our behaviours and the decisions we make.

By thinking, working, and behaving in the manner outlined in this Code, we can all contribute to our shared safety and success.

There are sources of help and additional guidance within the booklet. Please take the time to read and understand your responsibilities and where you can

access advice. If there are times when you are unsure or unclear about what action to take, it's important that you ask before you act.

**honesty,
ethics,
integrity,
sustainability
& respect**

Gwen Parry-Jones
Chief Executive Officer

Why a Code of Conduct?

Magnox has a broad profile of standards which provide detailed guidance for many of the things we do; you will be expected to understand and follow them.

This Code of Conduct brings together the high-level principles that run through our standards and highlights our underlying ethics and approach. It provides guidance about who you can contact for further advice and about when you will need to use your own knowledge and judgement to make decisions based on our values and principles. It will help us all to carry out our responsibilities in a manner

that is safe and ethical - as well as compliant with relevant laws, regulations, and our company policies and standards. Principally, the Code outlines the standards of behaviour and integrity we expect everyone working at, or alongside, Magnox to observe. It will be a living document that may be updated from time to time as Magnox continues to change and evolve over the coming years.

Please take time to read and understand the principles set out in the Code - and then put them into practice. Further sources for more detailed information, and contacts for support, can be found on page 19.





Our actions **MUST**
live up to our words

We are all accountable for our work and personal conduct. Whether we are a direct employee, contractor or supplier, when on Magnox business we have a duty to act in an ethical, respectful and professional manner, in compliance with the law and Magnox policies, standards and processes.

The attitudes, behaviours and expectations outlined in the Code are key to the success of our business. Our position in the local community and our reputation depend on them.

Our individual accountability includes:

- ▶ Respect for each other, valuing difference and not discriminating against others
- ▶ Compliance with our cyber-security protocols (e.g. adhering to Magnox policies to prevent data breaches, observing prohibitions on the use of copyrighted material or illegal gaming/music)
- ▶ Guidelines on social media use (which can include personal interactions on Facebook, Instagram etc.)
- ▶ Rigorous observance of our safety procedures, which include reporting potential safety risks
- ▶ Avoiding potential conflicts of interest between Magnox policies and personal concerns
- ▶ Compliance with our clear guidance on what may constitute fraud or theft, for example removing assets from sites without permission
- ▶ Ensuring we are fit for work each day, not overtired, or negatively affected by alcohol/illegal drugs/medication. Being open about issues we know may affect our capability
- ▶ Working together to ensure public money is spent efficiently, economically and effectively
- ▶ Being mindful of our sustainability strategy, our responsibility to our planet, our communities and the workplace environment we share with others
- ▶ Responsible storing and processing of personal data in line with Data Protection regulations.

It's important we are all aware that Code of Conduct breaches will be investigated as appropriate. Potential consequences would depend on specific circumstances. Some actions, behaviours or negligence may constitute a criminal offence which could result in referral to the police and, potentially, prosecution.

Counting on each other to do the right thing

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, any potentially illegal act or any company policy breaches, report them to the contacts provided in this Code
- ▶ Where breaches occur, co-operate fully and honestly with any internal investigations
- ▶ Knowing we can trust each other to behave in these ways means we will all be able to perform at our best together and avoid unwelcome surprises.





Create a positive environment



Our differences can be our strengths

We believe everyone should be able to contribute their own strengths and experience to our mission. This is why we promote diversity, equality and inclusion and, by extension, the overall mental health and wellbeing of us all. It means that everyone has a right to be treated with dignity and respect. We're committed to a workplace which is free from discrimination, harassment, bullying or violence.

By working for, or with, Magnox it falls to us all to ensure this positive environment is encouraged and sustained. This applies to how we treat people within the Magnox family and also to our stakeholders and site communities.

Day-to-day this means that we:

- ▶ Take responsibility for our behaviour, considering the mental health and wellbeing of others
- ▶ Treat people with respect and dignity
- ▶ Foster an inclusive work environment without prejudice or discrimination
- ▶ Value different views. If we need to challenge, we do it constructively
- ▶ Are aware of conscious bias as well as the possibility of subconscious bias
- ▶ Know that inappropriate behaviours have no place in our working environment.



We all have
a duty of care

We all have a duty of **care**

The Magnox Board and Executive team are committed to providing a safe, supportive and productive environment for everyone to operate at their best.

Safety and security are at the heart of everything we do to protect people and the environment. If we don't deliver on this priority we will lose the trust of all our stakeholders – and ultimately the right to carry out our mission.

But we mustn't forget that we are all personally accountable for delivering our work safely, securely and in an environmentally responsible way.

- ▶ Leaders are accountable for setting clear direction
- ▶ Each one of us should lead by example and demand the highest standards
- ▶ No task is so important or urgent that it cannot be done safely
- ▶ Look out for your own safety and for the safety of others.

It's important that we take the time to have Safety Conversations to help support and improve our safe behaviours.





Protecting the public purse

Protecting the public purse

Magnox is entrusted with a significant amount of public money each year to undertake our statutory duties and fulfil our mission. We have a duty to ensure we avoid unnecessary loss or misuse of this money, as well as to guard against inefficient or wasteful use of funds.

The Magnox Board and Executive, as part of the wider NDA Group, are committed to the exercise of the highest principles of public stewardship of the funding received and to use it effectively in delivering successful project outcomes.

Everyone connected with Magnox, whether that be employees, supply workers, contractors or supply chain partners, has a part to play in achieving this by, for example:

- ▶ Adhering to Magnox policies on ethical behaviour, disclosing any potential relationships with suppliers, and declaring any gifts/hospitality received
- ▶ Complying with systems of control, authorisation, and delegations. Making sure each time you authorise a timesheet, expenses, or large procurement you are valuing your signature or system workflow approval
- ▶ Reporting any activity you observe which does not look right.



Fair treatment of all our partners

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 anything.

We cannot tolerate corrupt practices

- ▶ At Magnox we will never give or accept bribes, illegal payments or inappropriate gifts or entertainment
- ▶ Every one of us has a responsibility to ensure fair and open competition and transparency in our business dealings
- ▶ We will act appropriately and lawfully in our external interactions
- ▶ Our supplier contracts require contractors to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes, and to include this compliance in their contracts with their own sub-contractors.

If you feel that something fraudulent, corrupt or in any way unlawful is happening, you must report your concerns through your line manager, directly to the Head of Internal Audit or through Safecall - our confidential third party reporting service.

Contact details can be found at the end of this guide.



Creating value
for future generations

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Our Sustainability Strategy outlines our principles and approach.

- ▶ **We aim beyond compliance towards excellence:** where we can, we aim to exceed minimum compliance
- ▶ **We work together:** we have a sustainability vision that is led from the top and owned by everyone
- ▶ **We are strongest together:** we are part of a diverse eco-system of stakeholders including our supply chain, regulators and communities. Each has a part to play in realising our ambitions
- ▶ **The wellness of people and the planet is our business:** we have a role to play in making a contribution to improving environmental and social wellbeing
- ▶ **Transparency matters:** We regularly review our performance and behaviours and share what is happening with stakeholders and are open about our progress.





HESAC Statement

Statement by the company

HESAC

Magnox Limited management and trade union appointed safety representatives are working together in partnership through local and company safety committees to:

- ▶ Achieve excellence in our health, environment, safety and security performance and provide a safe environment for all people on site, as well as members of the public
- ▶ Promote an open and honest reporting culture
- ▶ Recognise that individuals may make genuine mistakes and deal with them in a fair way
- ▶ Raise awareness of personal responsibility for safety in order to make sure we understand our work, together with its safety and environmental implications
- ▶ Encourage a questioning attitude and support challenges to potentially unsafe situations or inappropriate procedures.





What do we expect
of you?

What do we expect of you?

Ask yourself three simple questions

Am I setting a good example to others?

Does my conduct fall short of company expectations or could it be seen as inappropriate to others?

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



What to do if you are concerned?

We conduct our business openly, legally and with integrity. To continue this, it is crucial that everyone employed by Magnox Ltd, or working on our behalf, knows what to do if they suspect something improper is happening and knows where to go for help or advice.

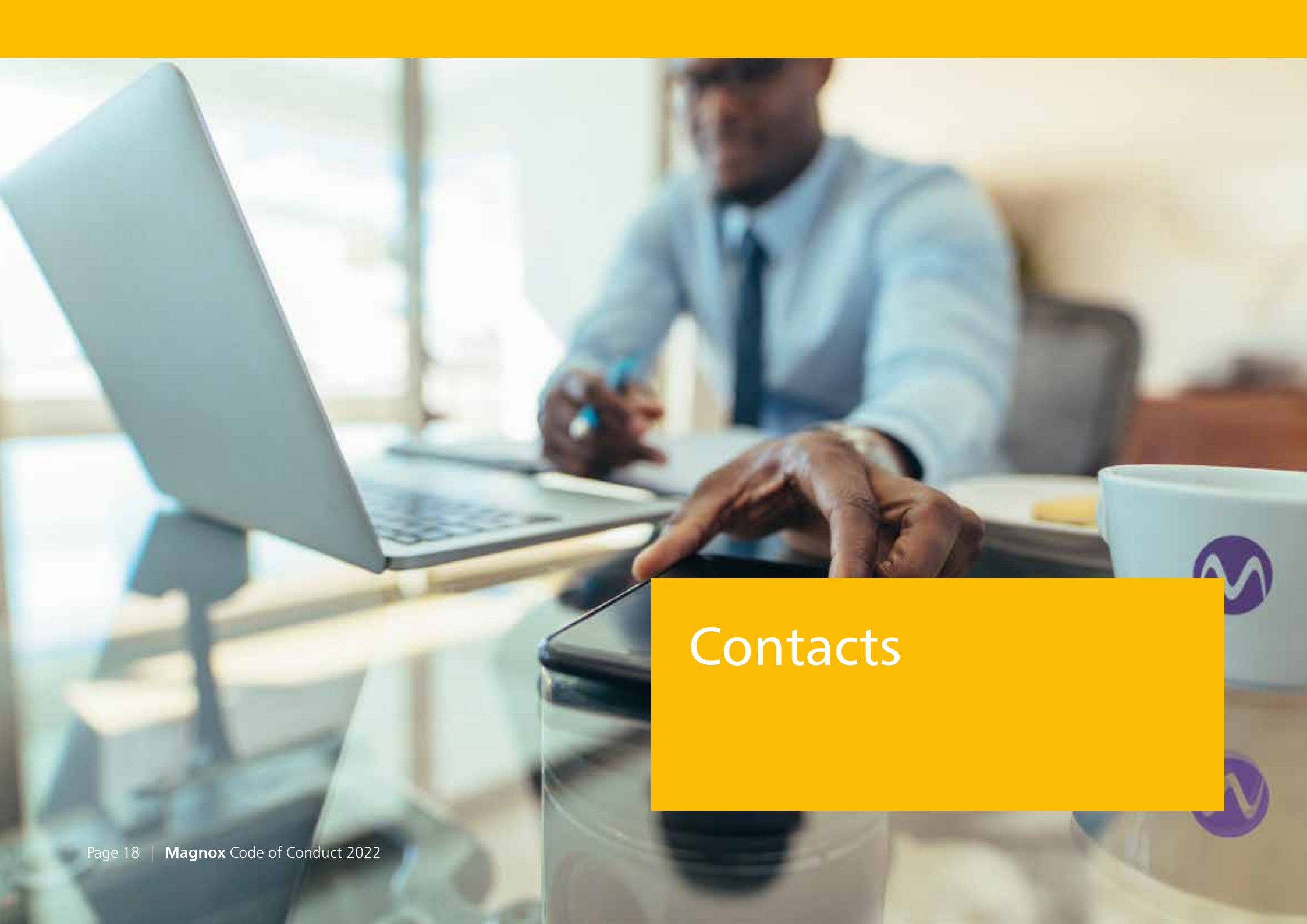
Reporting concerns helps us maintain a culture of integrity, in which we trust and hold each other to account. You are empowered to raise concerns knowing that they will be treated seriously, and where necessary, acted upon.

Where you see or suspect unethical, or unlawful activity or behaviours that discriminate or breach our policies, please report it.

If you are concerned but unsure about something you have become aware of, please ask for advice.

You can raise your concerns with your line manager, with Human Resources or with any of the contacts provided in this code on page 19. We are committed to ensuring that reporting a concern is itself not a cause of anxiety or fear.

We do not tolerate retaliation, victimisation or discrimination against employees who raise concerns.



Contacts

Contacts:

Ideally, you will be able to raise any concerns with your line manager.

You can also contact the following people if you have concerns:

Each part of the business has a designated Human Resources Business Partner (HRBP). You can identify your HRBP on the HR pages of the company intranet. There is also a contact number for HR Employee Services **employeeserviceshr@magnoxsites.com**

Magnox has three main trade unions across its sites - **GMB, Prospect and Unite**. You can search trade unions on the company intranet to find your local reps.

Internal Audit can also be contacted when you have concerns and wish to escalate or contact the Magnox Board on **internal.audit@magnoxsites.com**

Concerns can also be reported to the Nuclear Decommissioning Authority Group Chief Ethics & Compliance Officer: **Rebekah.Coleman@nda.gov.uk**

Safecall provides a completely confidential service to report any matter of concern observed that cannot be reported to a line manager or HR for whatever reason.

Search for Safecall on the company intranet |
E-mail **magnoxsites@safecall.co.uk** | Call **0800 915 1571**

Details of the full policies, standards and processes referred within this Code of Conduct are available on the Company Management System.





Magnox

For further information visit
www.gov.uk/government/organisations/magnox-ltd



@magnoxsites

Magnox Limited, owned by the Nuclear Decommissioning Authority, manages and operates 12 nuclear sites and one hydroelectric plant in the UK.