



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

It is important to publicly state these expectations in a code of conduct and recognise the joint nature of public service delivery. Suppliers are an extension of Magnox's business, and employees of suppliers interact with citizens and businesses on our behalf every day

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

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

Gwen Parry-Jones
Chief Executive Officer

Why a Supplier Code of Conduct?

The overall objective of this Supplier Code of Conduct is to build trusting and open relationships between Magnox and suppliers to drive improved performance throughout the supply chains. This Supplier Code of Conduct acts in a reciprocal way in respect of our suppliers and sets out the behaviours we would expect of each other. 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 Supplier Code of Conduct brings together the high-level principles that run through our standards and highlights our underlying ethics and approach. 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 Supplier Code of Conduct outlines the standards of behaviour and integrity we expect everyone working at and 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.

We expect our employees to treat suppliers with fairness and respect and to work jointly with suppliers to build trusting, collaborative and constructive working relationships. In return we expect suppliers to treat our employees in the same way, and to work with us to build those trusting, collaborative and constructive relationships that are focused on delivering for the public.

Please take time to read and understand the principles set out in the Supplier Code of Conduct - and then put them into practice.





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



The Supplier Code of Conduct is intended to set out the way in which we and our suppliers will behave towards each other. It is not intended to be legally enforceable, to create any legal obligations or rights or to undermine our contracts with suppliers or the rules we set out when we procure our goods and services, which at all times shall take precedence. For the avoidance of doubt, the Supplier Code of Conduct does not take precedence where the courts or other institutions such as a regulatory agency, authority or body have jurisdiction.

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 Supplier Code of Conduct are key to the success of our business. Our position in the local community and our reputation depend on them.

Our accountability includes:

- ▶ **Respectful treatment;** Our employees, those of our suppliers, and service users have the right to respectful treatment. We will not tolerate discrimination, harassment or victimisation in the workplace or in connection with any Magnox service. We expect our suppliers to provide the same commitment, including to their own employees. The Equality Act 2010 protects against discrimination, harassment and victimisation.
- ▶ **Professional behaviour;** We will work constructively and collaboratively with our suppliers. We expect suppliers to be prepared to invest in their relationships with Magnox and establish trust with our staff and with other suppliers involved in delivery.
- ▶ **Meeting user needs;** It is important that contracts with our suppliers meet the needs of service users. We will work together with suppliers to articulate these outcomes to ensure that the goods and services being

provided meet the needs of users and we expect fully reciprocal behaviour from suppliers.

- ▶ **Human rights and employment law;** Magnox and its suppliers must both comply with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Modern Slavery Act 2015. In addition, suppliers must have robust means of ensuring that the subcontractors in their supply chain also comply.
- ▶ **Cyber security:** It is essential that suppliers safeguard the integrity and security of their systems and comply with the relevant government standards and guidance. Suppliers must inform the National Cyber Security Centre if they become aware of any cyber security incident that affects or has the potential to affect Magnox data.
- ▶ **Sustainable procurement;** We expect our suppliers to be aware of, and support Magnox in, complying with its legal and contractual obligations under social value legislation, in delivery of the wider policy that sits behind the contract, and in the delivery of the targets as defined within the Greening Government commitments. We expect our suppliers to assist Magnox in the understanding and reduction of supply chain impacts on our environment, and risks related to the security of raw material supply. We expect suppliers to be open and transparent in assisting government in reporting publicly on product or service utilisation and any environmental impacts.
- ▶ **Safety;** We expect rigorous observance of our safety procedures, which include reporting potential safety risks.
- ▶ **Conflict of interest;** We expect suppliers to mitigate appropriately against any real or perceived conflict of interest through their work with Magnox. A supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential for future competition, for example by creating a technical solution that locks in the supplier's own goods or services.

Investigating breaches

It's important we are all aware that **Supplier 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.





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 including our supply chain.

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. 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 to **Magnox**.

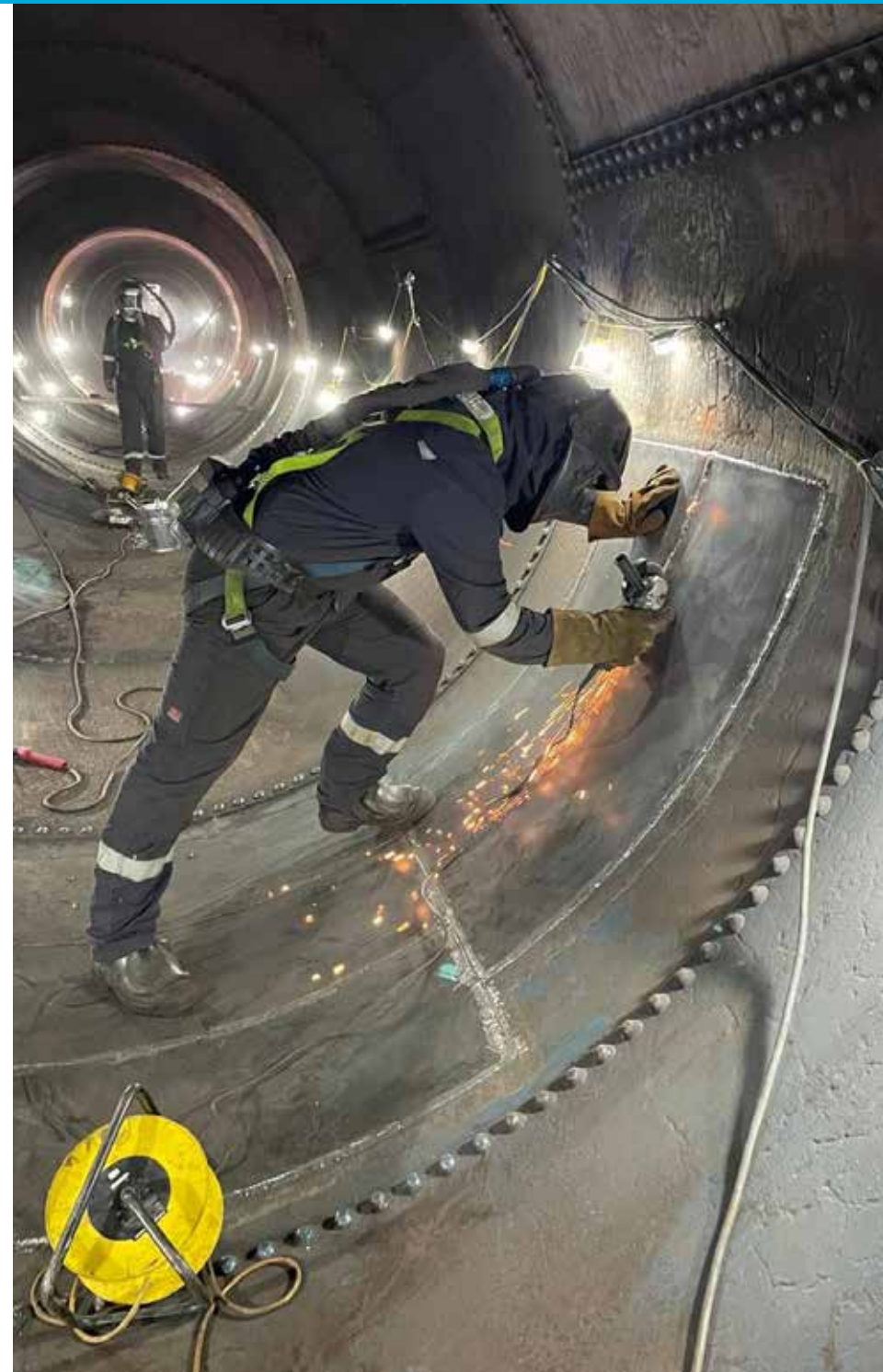


Creating value
for future generations

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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.





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 a site based Magnox safety representative or by calling your companies' whistleblowing hotline. 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 anyone who raises a concern.



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.