Personal conduct

In detail

We are nuclear professionals in everything we do. Our personal conduct covers many different areas. For further information on these, please click on any of the sections listed to take you to what you need to know for each.

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Use of information technology

We should all be vigilant when using IT systems including email, voicemail, instant or text messages. Disciplined use of IT is required to prevent disclosure, loss, theft, damage, careless or unauthorised use of physical assets and information. All information and data inputted onto company managed systems becomes company property. This includes externally hosted or cloud systems.

Be Aware:

- All information and data must be classified and managed in line with company policy.
- Individual log-on accounts and passwords must be managed in line with company policy.

- Engage only in limited personal use of company systems and only if it is permitted in the Sellafield Ltd Business Information and Technology policy.
- Internet usage must be reasonable and in line with company guidelines. The use of gambling sites is strictly prohibited, as is those containing sexually explicit or otherwise offensive content.
- Don't violate copyright or trademark rights, use unlicensed software, make unauthorised copies, or make defamatory statements while using Sellafield Ltd information systems and technology.



For any further advice or queries, contact the Conduct Compliance Office using the details listed at the end of this Code.

Scenarios >

Use of information technology

Scenarios

Here you will find some example situations which some of us have faced at Sellafield Ltd regarding information technology. Think about how you would respond if you were faced with these scenarios, then hover over the answer button to see what the appropriate responses would be. This could help you make the best decision if you find yourself in the same situation in the future.



Conflicts of interest

Conflicts of interest can occur in a wide range of common business situations.

Think carefully about your actions and assess whether a potential conflict exists. If you are concerned that your actions could be viewed as creating a conflict between your personal interests and the company, then you should check with a member of management or the Conduct Compliance Office. There are multiple situations which could create a conflict, some typical examples are shown here:

Outside Employment

Working as an employee, consultant or in any other capacity, with any other business (including volunteer activities), especially one that competes for work with Sellafield Ltd.

Use of company resources

Using the name, logo, proprietary information, assets, resources or equipment operated by Sellafield Ltd in connection with outside employment, business activities or for personal gain.

Either directly or through an immediate family member; having a financial interest in any other business, organisation or activity that may be affected by your actions and decisions whilst working at Sellafield Ltd.

Personal relationships at work

Close personal relationships improperly influencing your decisions at work. You should not be working in a position where you could influence the salary or performance review decisions about a family member or a romantic partner. Also, if you have a close personal relationship with another person, you should not be able to assign, review, approve or somehow affect the work of that person. If your circumstances change and you find yourself in a position where you gain or lose a close personal relationship with another person then you must notify Human Resources and/or your line manager immediately. You should never informally share company information with relatives or friends who work in the supply chain or with our customers.

All actual, perceived or potential conflicts of interests must be disclosed in writing and sent for review to conduct.compliance@ sellafieldsites.com using the Proforma. Please see the Conduct Compliance and Corporate Investigations sharepoint page for more information.



Drugs and alcohol

We all need to be alert and fit for work if we are to deliver the demanding standards of safety which Sellafield Ltd requires. The use of alcohol or any other drugs, including prescription medicines, must not impair our ability to work safely and make sound judgements.

Attending work when unfit due to drugs or alcohol can have serious consequences for you, our colleagues or our community so we must take care to ensure that any consumption, even outside working hours, does not affect our ability to do our jobs competently and safely.

This means all employees and contractors must comply with and enforce our strict policy on the misuse of alcohol and drugs. We recognise that this policy is supported by the random and "for cause" testing programme for drugs and alcohol. Where appropriate, Sellafield Ltd will continue to provide support and counselling for individuals found to be mis using drugs or alcohol. Some medicines contain alcohol or can impair our ability to do our jobs. You should carefully check the advice leaflets provided by the manufacturers of their products. If you are still in doubt seek guidance and approval from the Occupational Health department prior to use or before reporting for work having taken them.

You must not bring illegal drugs or alcoholic beverages onto any of the company's sites, including satellite sites. Sellafield Ltd will not tolerate the possession or use of prohibited substances.

This includes the possession or consumption of alcoholic beverages and illegal drugs in the workplace and will conduct searches of company premises if we have reason to believe that such substances are present on the premises. Any substances found as a result of a search will be confiscated and disciplinary action will be considered.

Drugs and alcohol

Scenarios

Here you will find some example situations which some of us have faced at Sellafield Ltd, regarding drugs and alcohol use.

Think about how you would respond if you were faced with these scenarios, then hover over the answer button to see what the appropriate responses would be. This could help you make the best decision if you find yourself in the same situation in the future.

Keeping personal information safe

Sellafield Ltd keeps personal records for every employee including HR and medical information. These records, with your help, must be kept as accurate as possible and strictly confidential. We are all committed to ensuring this.

Personal information will only be used for the purpose for which it was collected and only disclosed as necessary for legitimate business purposes or as required by law. If you have access to any personal information that may be of a sensitive nature, you must treat the information as your own and safeguard its distribution.

All information is stored and accessed in compliance with General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA '18).

If you need any further guidance or advice, contact the Data Protection Officer via the contact details provided in the 'Getting help and reporting concerns' section of this Code.



Personal security

We all need to feel that Sellafield Ltd sites are safe places to work, and trust that we are all doing our part to keep them safe. To do this, take a proactive approach to your personal security, for example:

- To prevent losses, secure personal and company valuables at all times.
- Do not leave bags or equipment unattended in an unsecured location.
- You should also take special care when travelling offsite or between sites.
- Avoid conversation about work in public.

Violent behaviour and or any sort of offensive weapons even if related to sports activities, are prohibited on our premises.



If you need any further guidance or advice, contact the Conduct Compliance Office via the contact details provided in 'Getting help and reporting concerns' section of this Code.

Security and safeguards on our sites

Sellafield Ltd is committed to the physical security of its sites, the nuclear materials and the information contained on or about them. We all have a duty to:

- Manage security issues responsibly. This will help prevent a terrorist act or theft of nuclear material.
- Protect the sensitive information contained in documents and the knowledge that we hold, in accordance with company procedure.
- Be careful about where you store documents or electronic devices.
- Always wear and display our company pass while on site. This must be removed when you are no longer on site.
- Always lock your computer when away from your desk for any amount of time.
- Manage documents in accordance with their security classification.

Nuclear materials control, accountancy, and safeguards.

Nuclear material control is knowing what material we have, where it is and what we can do with it. It is vital for safety and security. Accountancy is telling our regulators about material movements and Safeguards is demonstrating to our stakeholders, including the international community, that we have good material control.

If involved with operations, we all have a duty to:

• Manage movements of nuclear material responsibly, ensuring good material control and making timely, legible and accurate records.

• Only move nuclear materials in accordance with allowable procedures.



For further guidance or advice, contact the Conduct Compliance Office via the contact details provided in 'Getting help and reporting concerns' section of this Code.

Scenarios >

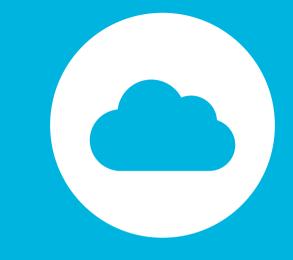
Security and safeguards on our sites

Scenarios

Here you will find an example which some of us have faced at Sellafield Ltd. regarding security and safeguards. Think about how you would respond if you were faced with this scenario, then hover over the answer button to see what the appropriate response would be. This could help you make the best decision if you find yourself in the same situation in the future.

Fraud or theft from the company

If you suspect fraud or theft, you must report this immediately to the Conduct Compliance Office at conduct.compliance@sellafieldsites.com (see reporting concerns for more guidance or advice). Do not attempt to investigate the issue yourself, and do not tell others about it; these actions could alert the people concerned and they could destroy documents and other evidence that might be needed for an internal or criminal investigation.



For further guidance or advice, contact the Conduct Compliance Office via the contact details provided in 'Getting help and reporting concerns' section of this Code.

Scenarios >

Fraud or theft from the company

Scenarios

Here you will find some example situations which some of us have faced at Sellafield Ltd. regarding fraud or theft. Think about how you would respond if you were faced with these scenarios, then hover over the answer button to see what the appropriate responses would be. This could help you make the best decision if you find yourself in the same situation in the future.

Using social media responsibly

Social media is part of everyday life. It will continue to help shape the world around us, and has the potential to change how Sellafield Ltd interacts with the world. Currently there is a lack of clarity, and therefore a lot of confusion, over how we expect our people to engage with social media. This guidance is designed to give you the information you need to participate in social media with confidence, and empower you to maximise the opportunities social media presents to us as a business and as individuals. It will help you understand why the company uses social media and how employees of Sellafield Ltd are expected to interact with social media both in a personal capacity and when representing the company.

Who is this guidance for?

We all play by the same rules, no matter what level of the organisation we are at. This guidance covers all individuals working at all levels and grades, including directors, senior managers, employees, consultants, contractors, trainees, casual and agency staff and volunteers. Sellafield Ltd regards all of the above groups, acting in any capacity on behalf of or in relation to Sellafield Ltd, as ambassadors for the company.

As ambassadors, we expect everyone to embrace our manifesto in our online behaviours, just as we would expect them to embrace them in their offline behaviours.

Why do we encourage social media usage?

As a tool, social media offers countless opportunities for Sellafield Ltd, enabling us to reach a wider audience than ever before. Social media enables us to educate people about what we do, and communicate our achievements, our goals and the challenges we face. It helps us to attract new missions, collaborate with other industries, recruit our future workforce, organise events, and gather feedback and information on key topics as we monitor the changing world around us. By sharing what we have to say, we can widen the audience that we reach.

As with all online activity, social media also presents risks to safety and security that we as a company and you as individuals need to be aware of. E-learning course EL0163 includes guidance and advice on how to mitigate these risks, which is useful for not only your social media activity in relation to Sellafield Ltd, but your social media usage in general.

How does Sellafield Ltd use social media?

Sellafield Ltd commits to demonstrating its manifesto and nine core behaviours in all its interactions with the public and our people, and these commitments apply to social media platforms as well as face-to-face interactions. We expect the same commitment from all our company ambassadors. When using social media, we will:

- Be transparent and honest in all our social media engagements, and at all times we will trust and hold to account ourselves and others in our decisions and behaviours online. Comply with all relevant information and <u>Social Media Guidance.pdf (ssa-intra.net)</u> and IT security policies, and respect any copyright, trademarks or 3rd party rights.
- Use social media.co.uk to demonstrate we are an open, transparent organisation which embraces collaboration with other industries and other people. By using social media to participate in these conversations, we can help to deliver our mission sooner, more safely, and more cost effectively.

- Never jeopardise the security of Sellafield Ltd's information, assets, or sites. Employees holding SC/ DV clearance should withhold this status from all social media platforms/profiles. Any reported disclosures will be reviewed by the Sellafield Personnel Security Manager and may result in further action being taken. We apply the same rules on social media communications that we would in any other form of communication. Our online activities must not compromise our safety or security.
- Respect and include everyone who wants to engage with Sellafield Ltd on social media. This will create an environment where everyone can contribute their thoughts and ideas.

We realise that, particularly in the communities we operate in with a high proportion of Sellafield Ltd employees, it is often difficult to completely separate our professional lives from our personal lives on social media. There will be overlap at times. We fully support and encourage our people to participate in social media exchanges and respect your rights to free speech, but keep in mind that you are responsible for your own social media posts, and that they can potentially be shared beyond your own contacts.

If you post anything that contradicts our manifesto, for example by sharing content or views considered to be derogatory, discriminatory, bullying, threatening, defamatory, offensive, intimidating, harassing, creating legal liability for the organisation, bringing the organisation into disrepute, breaching the dignity at work guidance or any other guidance could result in disciplinary action being taken. This may include comments, videos, or photographs, which have been posted on social media sites about the organisation, employees, work colleagues or managers. Sellafield Ltd reasonably monitors our behaviour in the social media space to maintain our brand manifesto and ensure we are in line with our existing information security policies.

How can you use social media as an ambassador of Sellafield Ltd?

Here we have answered some of the questions we regularly receive about social media from our workforce and partners. Hopefully this will give you the information you need to maximise the opportunities social media presents.

Can I use social media if I work for Sellafield Ltd?	Yes
Can I say I work for Sellafield Ltd on social media platforms?	Yes, it is fine to say you work for Sellafield Ltd, but do not mention building numbers.
Can I engage with content from official Sellafield Ltd social media accounts?	Yes
Can I participate in discussions about Sellafield Ltd on social media?	Yes
Can I use social media for work purposes, such as engaging with people from other industries?	Yes

Failure to read this guidance does not make you exempt from it. Where breaches in our social media expectations occur, they will be investigated, and appropriate action will be taken up to and including dismissal and/or removal from sites operated by Sellafield Ltd.

Site Access & Parking

We should all be aware of how we conduct ourselves in a professional working environment. This extends beyond the office environment and includes how we park on Sellafield Ltd sites.

To access the Sellafield Ltd site with a private vehicle you require a personal or tactical plan SOVA. If no-one in a car share is in possession of a relevant SOVA you must use a bus service/ other means to enter site. More guidance can be found in the Transport and Travel tab on the front page of the intranet.

Our behaviours and the decisions we make whilst parking matter, especially on controlled sites such as ours where space is required to maintain safe and secure operations. Improper parking behaviours can have a major impact on how we can perform as a team, and ultimately our ability to deliver our mission successfully.

This becomes even more apparent as the impact of future projects reduce the space that we have to park our vehicles. The consequences of making the wrong decision can not only inconvenience others around us, but also have safety and security implications.

As employees at Sellafield Ltd we all maintain stringent safety standards whilst carrying out our daily tasks, there should be no reason why this doesn't apply to our parking standards.

Consequences for parking infringements are as follows:

- Three standard parking infringements = 6 month ban
- Parking in a Disabled bay = automatic 6 month ban
- Blocking an Emergency Exit = 12-month ban

If we all display good parking behaviours, potential negative consequences can be avoided. For more information on parking standards on Sellafield Ltd sites, please visit our access and parking manual via the intranet.

Scenarios >

Site Access & Parking

Scenarios

Here you will find some example situations which some of us have faced at Sellafield Ltd. regarding parking on Sellafield Ltd sites. Think about how you would respond if you were faced with these scenarios, then hover over the answer button to see what the appropriate responses would be. This could help you make the best decision if you find yourself in the same situation in the future.