

Working with our partners

In detail

We don't work alone. We deliver our mission via partnerships. Our regulators, supply chain, and wider stakeholders all contribute. Without them, we cannot achieve it. It is therefore crucial that we create and maintain these relationships fairly and honestly.

We are one team. Working together, we make a difference.

[◀ Back to the Code](#)

Sections

- Bribes and illegal payments >
- Gifts and hospitality >
- Political contributions >
- Corporate Affairs >
- Event attendance >

Bribes and illegal payments

We strive to deliver our business objectives fairly and honestly. We never give or accept bribes, illegal payments or other improper means to influence anyone's judgement about our business. A bribe could be anything given in exchange for a decision or company information.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services. They must select suppliers based exclusively on normal commercial considerations such as quality, cost, availability, service and reputation, and not on the receipt of special favours.



Buying or selling shares in a company based on inside knowledge is illegal. We will not, in a personal capacity, act on information we receive about companies with whom we do business.

We must comply with anti-corruption laws including the UK Bribery Act. These laws prohibit improper payments to any government official, political party or candidate to gain an advantage.

We will not tolerate bribes or illegal payments. The company will ensure that it has adequate procedures in place to prevent bribery and other corrupt practices.

In the case of suspected fraud, bribery or corruption this should always be reported to the Sellafield Ltd Conduct Compliance Office (conduct.compliance@sellafieldsites.com)

Bribes and illegal payments

Scenarios

Here you will find some example situations which some of us **have** faced at Sellafield Ltd. regarding bribes and illegal payments. 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.

[◀ Back](#)

Gifts and hospitality

Gifts with a nominal value and appropriate hospitality can help build business relationships. However, whether given or received, gifts and hospitality should never improperly influence any business decisions and should never be accepted where they could, or could be seen to, influence a business decision.

Gifts or hospitality must only ever be accepted where doing so would support the business interests of Sellafield Ltd and will not damage the reputation of the company.

The Conduct Compliance Office has absolute discretion to approve or reject any requests for gifts or hospitality and, in line with the requirements of the UK Bribery Act 2010 and our own Sellafield Ltd Conduct and Compliance Policy, shall retain a log of all requests which can be audited and if necessary, used as evidence.

[◀ Back](#)

Gift guidelines:

- The gift must be of a suitable nature, not lavish and of a nominal value. Typically, a gift should not be accepted, or given, if the cumulative value from any one organisation or individual exceeds £200 in any 12 month period or £50 for any one gift.
- The gift must be given for an appropriate reason.
- The gift must be given at an appropriate time (e.g. not in advance of the issuing of an opinion or determination, or in advance of the award of a contract).
- The gift must be of a “one-off” or of an irregular nature.
- Gifts of cash equivalents (such as gift certificates, loans, shares etc.) are expressly prohibited under all circumstances.
- Immediate family members may not give a gift, nor accept a gift connected with your work.
- Understand and respect the gifts and hospitality policies of our business partners, suppliers and vendors and do not create situations that may violate those policies.
- It is considered a gift to be paid by an external party to attend an event in your official capacity and representing Sellafield Limited, for example a speaker at an event.
- Gifts include Sponsorship and this will require approval from the CEO prior to declaration to the CCO.

All gifts, whether given or received, must be declared to the company through the Conduct Compliance Office at conduct.compliance@sellafieldsites.com

[Next page >](#)

Gifts and hospitality

Hospitality and Events Guidelines:

In the following circumstances, it may be considered appropriate to accept, or provide, a working lunch or dinner, or beverages, in the normal course of business, where it is:

- not lavish in nature;
- not a frequent occurrence;
- there is no actual, potential or perceived conflict of interest
- does not exceed the value of £50 per person
- there is a genuine business benefit to Sellafield Limited.

Attendance at business events are permitted where approval by Senior Management has been obtained. Where another organisation has invited you to an event as a guest, this must have authorisation by your relevant Executive Member prior to declaration to the Conduct Compliance Office for final approval. This must have a genuine business reason and cause no actual, potential or perceived conflict of interest. Transport, overnight accommodation, and any other incidental expenses should be covered by Sellafield Limited (having obtained the budgetary approval) or covered by the individual attending.

< Back

Paying to attend awards, of any kind, requires the approval of the relevant Executive Member or the Sellafield Ltd Chief Executive Officer prior to being declared to the Conduct Compliance Office.

The Company supports charity events and employees may accept invitations up to a nominal value of £50. Employees are attending as private individuals and charitable donations, refreshments above those provided by the inviting organisation, transport, overnight accommodation, and any other incidental expenses etc. are personal and are not to be claimed back from Sellafield Ltd.

It should be presumed that attendance at major sporting events, other corporate social events and supply chain social events are not appropriate. If it is considered there is an over-riding business need, this must be approved by the Sellafield Ltd Chief Executive Officer prior to being declared to the Conduct Compliance Office.

No gifts or hospitality must ever be given to government employees or elected officials without prior approval. In all such cases this approval is jointly given by the CEO in conjunction with the Conduct Compliance Office.

[All gifts and hospitality requests above nominal value must be declared in writing and sent for review to \[conduct.compliance@sellafieldsites.com\]\(mailto:conduct.compliance@sellafieldsites.com\) using the appropriate forms \(Proformas can be found here\)](#)

Scenarios >

Gifts and hospitality

Scenarios

Here you will find some example situations which some of us **have** faced at Sellafield Ltd. regarding gifts and hospitality. 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.

◀ Back

Event attendance

It is crucial to remember that we represent Sellafield Ltd at all times.

If you are attending an event on behalf of the company, bear in mind that your words and actions can be interpreted as those of the wider company. Bear this in mind when making decisions at events, such as giving your personal opinion on Sellafield Ltd matters, and how much to have to drink.

If you are invited to an event or being hosted in any way, this will be considered hospitality and separate guidance applies.

If you are presenting something at an event on behalf of Sellafield Ltd, please ensure your materials have been cleared for public viewing. To do this, send your materials to our corporate affairs team at conference.and.events@sellafieldsites.com prior to the event, who will ensure that they are in line with company messaging and branding.

◀ Back

At an event, if you are asked to speak about something which you may not know enough about to do so, don't leave it to chance. Ask someone who does know about the subject to either provide you with information or take your place for any presentations on that subject. This reduces the risk of incorrect or conflicting information being shared.

When returning from an event, it is crucial that we share any learning with the wider business to maximise the value Sellafield Ltd gets from your attendance. Why not write a blog about the event when you return so everyone can share in your learning?



Political contributions

Sellafield Ltd does not lobby or make political contributions, and no contribution should be made in its name.

We recognise that you may engage in political activity in your own time, but company time, assets and facilities may not be used for your political activity.



[◀ Back](#)

Corporate Affairs



A positive corporate reputation plays an important part in helping us deliver our purpose. Speaking and engaging openly, honestly, in a timely manner and with a consistent voice is key to maintaining that reputation.

To do this we have a dedicated team of Corporate Affairs professionals who manage our relationship with the media and external stakeholders. They also build understanding of our purpose through regular public facing engagement activities, conferences, social media and other communications channels.

If you are contacted by the media or a member of the public, you should report this to the Corporate Affairs team as soon as possible. To do this, contact our External Relations team.

[Scenarios >](#)

Corporate Affairs

Scenarios

Here you will find an example which some of us **have** faced at Sellafield Ltd. regarding stakeholder relations. 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.

[◀ Back](#)