#### Diversity

The Company is committed to ensuring that individuals are treated with fairness and respect, regardless of race, color, religion, creed, national origin, ancestry, disability, sex, age or other protected characteristics as defined by U.S. Federal or local laws.

#### Harassment

Harassment in the workplace is behavior that is unwelcome and offensive to specific individuals or groups. We do not tolerate actions, comments, inappropriate physical contact, sexual advances or any other conduct that is intimidating or otherwise offensive or hostile.

# Quality

Meeting customer contractual requirements with a focus on quality, excellence and continuous improvement is of primary importance in BWXT's business. We view our Suppliers as an extension of our own processes and expect the same high quality.

#### Protection of Physical Assets and Proprietary Information

BWXT's assets – both physical and intellectual – are highly valuable and are used to advance the Company's business purposes and goals. All Suppliers are expected to prevent waste, loss, damage, misuse, theft, misappropriation or infringement of BWXT's assets.

Information acquired with respect to BWXT's business should be kept confidential, unless and until BWXT consents to its disclosure, or unless such knowledge and information becomes generally available to the public through no fault of the applicable parties.

# Integrity of Records and Accounting Procedures

Records must be complete and accurate in all material respects. You must not hide, fail to record or make false entries in any book or record. All financial books and records must conform to generally accepted accounting principles and legal requirements.

# WHERE CAN YOU GO FOR ANSWERS?

1-855-871-9138

(call toll-free)

BWXT's ethical standards are integral to the success of our Company and the strength of our reputation. By following the guidelines in this

www.BWXTHelpline.com

(for confidential reporting)

brochure and in BWXT Code of Business Conduct, the Company's

business partnerships with all Suppliers will be enhanced and

strengthened. Your adherence and cooperation are expected

BWXT is proud to maintain a strong ethics culture, and we expect our Suppliers, employees and business associates to provide feedback, including views, questions and concerns, regarding the standards outlined in this brochure. Please contact us at ethics@bwxt.com, or call BWXT Help Line toll-free at the numbers noted below. The Help Line is available 24 hours a day and is managed by an independent third party. All callers have the option to remain anonymous.

Anonymous Web Reporting

and appreciated.



# **BUSINESS STANDARDS**

FOR SUPPLIERS, SUBCONTRACTORS & CONSULTANTS



the strength of integrity



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#### AT BWX TECHNOLOGIES, INC. (BWXT),

our employees, as well as our suppliers, subcontractors, consultants and other third party intermediaries **(each referred to as "Suppliers")** play a critical role in BWXT's core business as it works to provide high-quality, competitive solutions in a global economy. These business standards apply to all Suppliers that provide direct and indirect materials and services to BWXT, when doing business with or on behalf of BWXT.

BWXT maintains a business culture that is of the highest integrity. We expect our employees and Suppliers to exercise professional, cooperative and objective behavior in business relationships, and avoid impropriety or even the appearance of impropriety, in all business interactions.

While Suppliers should have and abide by their own business standards, this brochure summarizes BWXT Code of Business Conduct, which establishes our expectation of how all business with, for and by BWXT is to be conducted. Violations of these standards by any employee or Supplier will not be tolerated.

#### Bribes, Kickbacks, Unlawful Payments and Other Corrupt Practices

Direct or indirect offers, payments or authorization of payments of any value cannot be made for purposes of:

- Influencing judgment or conduct of any individual or company
- Ensuring a desired outcome or action of any individual or company
- Obtaining a benefit we are not legally entitled to receive
- Winning, retaining business from, or otherwise influencing any government official (including "deemed" government officials), political party, political candidate or official

#### Gifts & Entertainment

BWXT purchases products and services on the basis of quality, price and reliability. In turn, customers are expected to obtain products and services from BWXT on the same basis.



Strong relationships with our Suppliers are vital to our work; however, giving and receiving gifts or entertainment can potentially affect the independence of our judgment and that of our customers, and may create the appearance of favoritism. For these reasons, BWXT employees

and the Company's business associates must not receive, solicit, offer or give inappropriate gifts or entertainment that may influence, or be perceived to influence, the recipient's integrity or independence.

BWXT operates in many countries with unique local traditions, and in many cultures, gifts and entertainment are integral to good business practice. In these cases, giving or receiving gifts or entertainment that relates to BWXT's legitimate business is permissible only if the reason for the gift or entertainment is appropriate and within BWXT's set gift policy.

While promotional logo items are generally acceptable, cash, *gift* cards or other cash equivalents are always unacceptable. Good judgment and high ethical standards are prerequisite to all business dealings.

### **Conflicts of Interest**

Conflicts of interest can arise in many circumstances, with the most common concern being personal or financial interests. All potential conflicts of interest should be disclosed to BWXT and documented. For the sake of practicality, BWXT does not distinguish between a perceived conflict of interest and an actual conflict of interest. Action should be taken to ensure all potential conflicts do not progress into perceived or actual conflicts of interest.

#### Fair Competition Laws

Fair Competition laws forbid agreements or activities that restrain trade or limit competition. BWXT is committed to fair competition in compliance with international laws, the laws of the U.S. (antitrust) and the laws of the country in which we are dealing. BWXT employees and Suppliers representing BWXT are expected to comply with all applicable laws and regulations regarding fair competition.

#### **Trade Compliance**

The laws of many of the countries in which BWXT conducts business restrict the export of some commercial and specialized goods and technologies. Compliance with the letter and spirit of all applicable import and export



controls and trade compliance laws is mandatory. This includes screening end use, end users' customers and countries against export blacklists; screening orders against diversion risks; and ensuring BWXT does not cooperate with or agree to illegal boycott language.

# Environmental, Health & Safety

We aim to provide a safe, secure and healthy workplace where employees and Suppliers can finish each day incidentand injury-free, while ensuring no harm to the environment during operations or projects. BWXT expects all employees and Suppliers to follow the Company's Environmental, Health & Safety policies and procedures. BWXT is also committed to ensuring that the workplace is free from the use of illegal drugs, the misuse of legal drugs and the abuse of alcohol.

# **Organizational Culture**

BWXT also believes in the importance of a strong organizational culture throughout its operations. BWXT is dedicated to having a culture where employees at all levels of the organization feel comfortable speaking up if they have a question, or raising an issue so it can be addressed, especially with regard to safety and creating a safety conscious work environment. It's a culture where individuals are treated with respect, where there is a high degree of trust, and where problems are addressed in an appropriate and timely manner.

### Corporate Social Responsibility

We encourage all BWXT Suppliers to share our respect for promoting corporate social responsibility. BWXT is dedicated to being a good corporate citizen. We have a commitment to contribute to the economic, environmental, and social sustainability of the communities in which we live and work.

