

HUMAN RIGHTS POLICY

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HUMAN RIGHTS AND BWXT

Responsible corporate citizenship, including respect for human rights, is a fundamental BWXT principle. Engaging in any form of activity that violates the human rights of others, including human trafficking, procuring commercial sex acts, or the use of slave or forced labor, while in the performance of any BWXT contract by the company, its employees, agents, subcontractors or representatives on behalf of the company is expressly prohibited.

This policy summarizes principles contained in the BWXT Code of Business Conduct as well as practices and procedures already set forth in other policies into a single document to create a comprehensive reflection of BWXT's standards on these matters.

NON-DISCRIMINATION AND HARASSMENT

- BWXT will uphold all applicable laws in all locations in which the company operates and will hold all who work for, or on behalf of, the company to this standard. Employees will conduct business with integrity and will not knowingly engage in or facilitate any illegal or unethical conduct by others.
- BWXT will work to minimize any negative consequences of its business activities by minimizing harm to the environment, promoting workplace safety, and communicating in an accurate and transparent manner with its stakeholders.

- BWXT offers equal employment opportunities to qualified individuals, regardless of race, religion, national origin, age, sex, sexual orientation, gender identity, disability, genetic information, protected veteran status – or any other factor protected by law and/or company policy. These policies apply not only to hiring decisions but to all aspects of employment. Every employment decision BWXT makes, from compensation and benefits to transfers and training, must conform to applicable federal, state, or local laws and to company policy.

FREEDOM OF ASSOCIATION

BWXT recognizes the rights of employees to participate in any lawful organization and will comply with laws pertaining to freedom of association, privacy and collective bargaining.

ENVIRONMENT, HEALTH AND SAFETY

BWXT is committed to providing a safe and healthful workplace for its employees and to protecting the environment in the communities where it conducts business.

WORK ENVIRONMENT, HOURS, SCHEDULING AND COMPENSATION

- BWXT strives to promote a work environment that encourages productivity, teamwork and communication and that provides employees with fair and competitive compensation and benefits for the local market in which the work is being performed.
- In addition, each business unit has established work schedules and shifts to meet the business needs of the company and its customers and to comply with applicable laws and/or collective bargaining agreements.

Resources for Questions and Reporting

Employees are asked to speak up and report any unethical business conduct or policy violations.

Help Line: 1-855-871-9138

Web: www.bwxthelpline.com

Email: ethics@bwxt.com

The Help Line is available 24 hours a day, seven days a week. The call will be answered by a professional third party and the interviewer will work with you to document the situation in detail. Your call will not be recorded, and you do not have to give your name.

HUMAN TRAFFICKING AND SLAVERY

The U. S. Government prohibits human trafficking and slavery. BWXT and its employees, agents or representatives on behalf of the company, are expressly prohibited from any attempt to:

- Engage in human trafficking and the use of illegal child labor or forced labor;
- Conduct business in a manner contrary to the BWXT Code of Business Conduct and established legal and ethical standards;
- Subject workers to physical or mental coercion;
- Fail to pay workers a fair and legal wage under applicable laws and regulations or have wages withheld for coercive purposes;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority;
- Use misleading or fraudulent practices during the recruitment or offer of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charge employees recruitment fees;
- Fail to provide return transportation or pay for the cost of return transportation upon the end of employment, a) for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (for portions of contracts performed outside the United States); or b) for an employee who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the United States);

- Provide or arrange housing that fails to meet the host country's housing and safety standards; or
- If required by law or contract, fail to provide an employment contract, recruitment agreement or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the working document shall be provided to the employee at least five days prior to the employee relocating. The Employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process and the content of applicable laws and regulations that prohibit trafficking in persons.

THIRD PARTY PROVIDERS COMPLIANCE

BWXT maintains the expectation and is committed to ensuring that its agents, subcontractors or representatives (collectively "third-party provider(s)") abide by the principles of responsible corporate citizenship and respect for human rights as outlined above. BWXT is committed to ensuring that its third-party providers do not engage in human trafficking and requires its third-party providers and their subcontractors to abide by the following policies with respect to the treatment of employees:

- Human trafficking and the use of illegal child labor or forced labor are strictly prohibited.
- Business will be conducted in accordance with the BWXT Code of Business Conduct and established legal and ethical standards.
- Workers shall not be required to surrender identity papers, other critical personal documents, or a "deposit" as a condition of employment.
- Workers shall not be subject to physical or mental coercion.
- Applicable child labor and workplace safety laws and regulations shall be strictly adhered to, and international treaties, compacts and regulations addressing the use of child labor and workplace safety shall be respected and applied in the absence of applicable local law setting minimum standards for the protection of workers.
- Workers shall be paid a fair and legal wage under applicable laws and regulations and shall not have wages withheld for coercive purposes.

AUDITING

Third-party providers must be able to demonstrate compliance with this policy at the request of and to the satisfaction of BWXT. BWXT is permitted to audit its third-party providers' compliance with this policy and, in cases in which serious risks are presented, such audit may be immediate and unannounced.

BWXT monitors its supply chains for a variety of reasons, and not solely to determine compliance with the prohibition against human trafficking or slave labor. BWXT will promptly and thoroughly investigate any claims that a third-party provider is engaging in human trafficking or slave labor and any such claim will be reported to the Audit & Finance Committee of the company's board of directors, along with the resolution of the claim and/or the findings of the investigation.

If a third-party provider is found to be engaging in human trafficking or slave labor, BWXT will take prompt remedial action to address the violation.

TRAINING

Periodic training shall be provided to all BWXT supply chain management and other BWXT executives regarding the BWXT Code of Business Conduct, including training on human rights, human trafficking and slave labor.

GOVERNMENT REPORTING REQUIREMENTS

The company and employees, agents or representatives on behalf of the company, shall inform the contracting officer and the agency Inspector General immediately of:

- Any credible information it receives from any source (including host country law enforcement) that alleges the company, its employee(s), subcontractor(s), subcontractor employee(s) or their agent(s) has/have engaged in conduct that violates this policy; and
- Any actions taken against the company, its employee(s), subcontractor(s), subcontractor employee(s), or their agent(s) pursuant to this policy.
- If the allegation may be associated with more than one contract, the company shall inform the contracting officer of the contract with the highest dollar value.