



NUCLEAR
UNIVERSITY

Code of Conduct

Nuclear University
NU-SOP-CC-01

2011 Rev. 0





A MESSAGE FROM NUCLEAR UNIVERSITY

Honesty, commitment, and absolute integrity are the core values on which the Nuclear University has been built. Any action inconsistent with those values damages our reputation and undermines our ability to fulfill our mission. *NU's Code of Conduct sets out the framework for ethical and legal business conduct.* These rules must be followed by all.

Workplace pressures such as increasing revenue, responding to customer demands, or meeting perceived competition must never be used as an excuse to violate the letter or the spirit of our policies or the law.

If you have a question or concern about the Code, raise it. Talk to a manager, to a Human Resources representative or to any Nuclear University officer.

The Corporate Safety Email Hotline is also available if you choose safety@nuclearuniversity.com. Your concerns, however they are raised, will be addressed promptly and with care.

We have a special responsibility for maintaining a culture which not only complies with all laws and policies, but also ensures that each of us conduct ourselves with absolute integrity in all aspects of our activities.

We at Nuclear University share in this responsibility and give it our highest priority.

The Nuclear University Team



CONFLICTS OF INTEREST

As a valued employee, you help maintain the company's integrity by not using your position to gain an unfair personal advantage, and by avoiding even the appearance that you are doing so. Generally, it is advisable to stay away from any situation where your self-interest is, or may appear to be in conflict with your duty to Nuclear University, making it difficult for you to make an unbiased decision, particularly when it involves family, business, personal or financial relationships.

Typical situations in which a conflict of interest could arise include:

- You have private dealings with organizations that have business or contractual relationships with Nuclear University;
- You have private dealings with organizations that have pending proposals or anticipate contracts or subcontracts with Nuclear University;
- You accept outside employment or do outside consulting ("moonlighting");
- You possess confidential or proprietary information about another entity and use it for personal advantage;
- You or a close relative have a financial interest in a company doing business or that might do business with Nuclear University;
- You have a relative in your direct employ, where you make the decisions regarding his or her pay and/or promotions;
- You accept a loan from any of customers or any company with which Nuclear University does business.

These are just some of the more common conflict of interest scenarios. Remember that the perception of bias is just as important as the actual wrongdoing. If you are in doubt, you should talk to your manager about the situation, or contact a Human Resources Manager, our Legal Counsel or the Corporate Office. Talking through potential conflict issues is the best way to resolve them.

DISCLOSURE

If you are employed outside of Nuclear University or have any other interest, financial or otherwise, in an organization with which Nuclear University does or may do business, you are required to report it . We encourage each employee to take the opportunity to think carefully about possible conflict situations and talk them over with a manager.

GIFTS

A gift can easily be mistaken for a bribe. As Nuclear University employee, you may not accept any gift, rebate, kickback or anything of economic value (including "Comps") from a person who does business or wants to do business with Nuclear University. Although it is okay to accept items of small value (pens, t-shirts or items costing less than \$25), you should not solicit any gifts from governmental employees or vendors. If you receive a more valuable gift or the offer of one, refuse politely and let your manager know. The same caution goes with giving gifts to clients and vendors. Gifts valued at more than \$25 cannot be given unless a Company officer has approved it.



BUSINESS ENTERTAINMENT

As a general rule, social or business related meals or other modest entertainment can be offered or accepted (but generally not to government employees). Is the meal or entertainment extravagant? Think about whether entertainment falls within the bounds of good taste and does not have the potential to harm our company reputation. If you are uncertain, talk it over with your manager or a Human Resources Manager.

OUTSIDE EMPLOYMENT

You may take on a second job or paid consulting work outside of Nuclear University, but you need to inform your manager to ensure the work won't impact your duties at Nuclear University or pose a conflict of interest. Approval will not be given if the second employer competes with Nuclear University, does business or is being considered for business with Nuclear University or conducts a business that has been developed by or for Nuclear University. Managers must advise their or business unit Vice President when approving an employee's outside work. Questions about possible conflicts of interest should be discussed with our Legal Counsel.

PROVIDING INACCURATE OR MISLEADING INFORMATION

Nuclear University relies on all of us to ensure the accuracy and truth of documents we prepare, review or sign on Nuclear University's behalf. Few events can be more damaging to the companies reputation than inaccurate or misleading documents, or reports that omit facts essential to overall accuracy. All employees are encouraged to discuss any uncertain situations with their immediate supervisor. If in doubt remember the following: **STAR (STOP, THINK, ACT, REVIEW)**. If you make a mistake or discover an error, talk to your manager immediately. Nearly all mistakes can be corrected through disclosure and discussion. Covering up problems, on the other hand, only makes them worse.

INTELLECTUAL PROPERTY PROTECTION

Intellectual property is, at its broadest, any idea that has some commercial value. It may be a "trade secret," which is any piece of information that derives commercial value from the fact that it is not generally known and which the owner takes steps to protect from public disclosure. Trade secrets can be formulas, know how, process, or even compilations of public information, which is valuable because it has been sorted and indexed in some way. For example, a customer list contains "public" information (i.e., names, addresses, etc.), but may be extremely valuable because the names on the list are known to have a need for or interest in a particular type of product. Giving away Nuclear University's IP, selling it to an unauthorized third party or using it for personal gain (such as in one's own business) is against company policy. Knowingly violating this policy could lead to disciplinary action, up to and including termination of employment, or—in the case of former employees, legal action.



SECURITY SENSITIVE INFORMATION

From time to time, Nuclear University may accumulate information, which if it falls into the wrong hands, could compromise client security or another national security interest. It is the duty of each employee to use good judgment and due care with all technical and business information to ensure it is shared and used only for business purposes. Additionally, sensitive or classified information SHALL only be handled in accordance with approved written procedures in/at an approved locations by authorized individuals only.

COMMUNICATIONS AND COMPUTER SYSTEMS

Nuclear University and/or their clients provide communications and computer systems (including voice mail, e-mail, networks, servers, data files, applications, laptops and desktops) to its employees to conduct company business. These resources are company or client property, and Nuclear University reserves the right to review, audit, intercept, disclose, access, read, delete or act on any information that is created or stored on our computer and communications systems to assure compliance with our policies or for other purposes. Users do not have personal privacy rights with respect to any information created, stored or transmitted on these systems. Good judgment consistent with Nuclear University policy should be used with respect to accessing the internet (including Web sites), transmitting information, creating data files and other uses of communications and computer systems.

ACCESSING PORNOGRAPHY AND OTHER "ADULT" CONTENT ON ANY WORK-RELATED COMPUTER SYSTEMS IS NOT ALLOWED.

WORKPLACE SAFETY AND SECURITY

Nuclear University maintains a safe, secure and healthy workplace, and has programs in place to address safety and efforts to prevent injury and illness. Everyone is expected to comply with: federal, state and local safety laws and regulations; safety rules; established safe work practices; and of course, to exercise caution in all work activities. Any accident or unsafe conditions should be reported to your manager.



EQUAL EMPLOYMENT OPPORTUNITY

At Nuclear University, we are committed to creating an environment that promotes achievement and professional development of all staff members. We believe that people with different perspectives provide the company with vitality, creativity, new ideas and growth. As part of our commitment, we provide equal employment opportunities to all persons, regardless of race, color, religion, gender (sex), sexual orientation, national origin, citizenship status, marital status, age, disability or veteran status. We will not tolerate discrimination based on any of these qualities. Any employee who violates this policy is subject to disciplinary action.

ANTI-HARASSMENT

We strives to maintain a safe, professional, and positive working environment that ensures that all staff members are treated with dignity, respect and courtesy. With that goal in mind, Nuclear University strictly prohibits harassment based on gender, race, religion, age, disability, pregnancy, medical conditions, sexual orientation, national origin, citizenship status, or any other basis protected by law. Workplace harassment occurs when someone is subjected to conduct that he or she did not invite and finds offensive or unpleasant, and which is based on any basis protected by law. Nuclear University does not tolerate harassing behavior from nonemployees who visit Nuclear University or any Nuclear University work setting. Anyone who has experienced or observed an incident which constitutes harassment should report this occurrence immediately. Due to the diverse workforce that is America, Nuclear University will make every effort to accommodate faith based worship practices at work, regardless of denomination or religion.

DRUG-FREE WORKPLACE

Nuclear University maintains a drug-free workplace. Any unlawful manufacture, sale or other distribution, dispensation, possession, storing or use of a controlled substance is prohibited, whether at any location or off-site, while performing work for Nuclear University or during work-related functions.



REPORTING CONCERNS

One of the most important responsibilities each of us shares is the obligation to raise concerns about possible violations of Nuclear University policy or the law. Sometimes it may seem difficult to raise such concerns and may even feel like a breach of personal ethical beliefs to do so. Failure to raise such a breach or suspected breach, however, can lead to serious harm. Nuclear University requires that employees report policy concerns. If you know about or suspect a possible violations of policy or law, you have several ways to report it. You are free to choose the most comfortable resource including:

- the person directly involved;
- your manager or any member of management;
- the Human Resources Department;
- Our legal counsel ;
- any Nuclear University officer.

Whatever method you choose, your report will be handled respectfully and seriously. If you choose to remain anonymous through a report to the Hotline and an investigation is initiated, you may be contacted during the course of investigation if the subject matter of the investigation makes it reasonable to speak to you—no one will try to figure out who made the report. In some cases, you may notice changes in procedures as a result of your report; at other times, the action management takes to resolve the issue may not be obvious. However, Nuclear University will take appropriate action in response to all compliance reports. When reporting a compliance concern, you should describe the situation to the best of your knowledge, providing dates, the names of people involved and the names of others who may have relevant information. Even if you do not have the complete facts, or you are uncertain whether the conduct violates our policies or laws, you should still make a report.