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TITLE: Supplier Code of Conduct	<u>5</u> YR PERIODIC REVIEW DATE: <u>11/12/30</u>	
	APPROVED BY: DATE:	Lydian Torres Garcia 11/12/25 (Signature on File)

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Level 1 Policy

Revision	Record of Issue/Revision	Affected Pages
0	Initial Release.	All

Previous Record of Issue/Revision information is available from the history files.

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A. PURPOSE

1. As the Decontamination and Decommissioning (D&D) contractor at the Portsmouth Gaseous Diffusion Plant (PORTS) site in Piketon, Ohio, Southern Ohio Cleanup Company LLC (SOCCo) has a responsibility to conduct its business responsibly, ethically, and legally.
2. SOCCo has an absolute determination to do the right thing. In all its dealings, SOCCo is committed to unyielding integrity and the highest standards of business conduct. This commitment is integral to SOCCo's continued success, which positively impacts suppliers, customers, employees, and communities where SOCCo does business.
3. SOCCo seeks to conduct business with businesses who share SOCCo's values of Safety, Courage, Character, Excellence, and Compassion and the principles expressed within SOCCo's Code of Business Conduct and Ethics Policy (the Code) (DND-HR-POL-00003, *Code of Business Conduct and Ethics Policy for Southern Ohio Cleanup Company LLC [SOCCo] Piketon, Ohio*). SOCCo's suppliers are expected to meet these expectations and, in turn, SOCCo requires their suppliers to demonstrate these values and principles as well. Mutual success and continuing business relationships depend on it.

B. SCOPE AND APPLICABILITY

1. This Level 1 policy applies to SOCCo's suppliers.
2. SOCCo reserves the right to verify that a supplier's business operations comply with these essential business principles.
3. SOCCo expects its suppliers to maintain full compliance with this policy (henceforth referred to as the Supplier Code) and all laws and regulations for contracting with the U.S. Government, and to ensure extension of these requirements to all sub-tier suppliers they employ on SOCCo's behalf.
4. For the purposes of this Supplier Code, "Supplier" is defined as any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to SOCCo or on SOCCo's behalf, including suppliers, contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities.
5. This Supplier Code is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code. If local law is not as strict as this Supplier Code, we require our suppliers to comply with this Supplier Code.

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6. In the event of a violation of any of the above expectations, SOCCo may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, SOCCo may be required to report those violations to the proper authorities. SOCCo reserves the right to terminate its relationship with any supplier under the terms of the existing procurement/purchasing contract.

C. **POLICY**

NOTE

SOCCo expects suppliers to maintain and enforce policies requiring adherence to best commercial and lawful business practices that encompass ethical expectations.

1. Ethics and Compliance Program

SOCCo expects its suppliers to maintain an ethics and compliance program that is commensurate with the size and nature of their business. The program should include policies and other processes to ensure compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code. This should include systems to monitor their compliance with these standards and take appropriate action to correct identified deficiencies or incidences of noncompliance.

SOCCo also encourages its suppliers to be familiar with the business practices of their suppliers and other business partners to ensure compliance with the law and the Supplier Code for any activity performed on behalf of SOCCo; to proactively manage and mitigate risk in their supply chain; and, where appropriate, report risk back to SOCCo to ensure that those risks are appropriately mitigated.

2. Health, Safety, and Environment (HSE)

The health and safety of all personnel associated with SOCCo's work is highest priority. SOCCo's suppliers are expected to:

- Apply safe work practices (including regulatory and contract-specific requirements) to all their activities and instill safety in every aspect of their work process and in the attitude and behavior of all their workers.
- Conduct their operations in an environmentally responsible manner and in accordance with applicable environmental laws.

3. Financial and Operations Controls

SOCCo expects suppliers to be honest and transparent and to create and maintain complete and accurate records for all transactions and business processes related to SOCCo's business, including those for timekeeping and invoicing purposes.

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SOCCo's suppliers are expected to:

- Keep accurate, complete, fair, timely, transparent, and understanding financial and operation books, records, and accounts and a system of effective internal controls for all SOCCo procurement and subcontract actions, and, as applicable by contract, include records of work time and expenses charged to SOCCo.
- Create, retain, and dispose of business records in accordance with best commercial business practices and any applicable legal and contractual requirements that may be flowed down to their company through SOCCo purchase orders and subcontracts.
- As may be flowed down by contract, protect non-public information relations to SOCCo and/or the United States Department of Energy (DOE).

4. Avoid Conflicts of Interest (COIs), Gifts, Entertainment, and Business Courtesies

COIs can arise when personal interests interfere or appear to interfere with a person's ability to make objective business decisions or perform their duties without bias. This applies to a conflict between the interests of SOCCo and the personal interests of those working on our behalf, or their close relatives, friends, or associates.

SOCCo's suppliers are expected to avoid all situations that create a COI, or the appearance of one, in their dealings with SOCCo.

SOCCo does not encourage or support its suppliers to use gratuities, promotional items, or entertainment activities as a means of maintaining their professional business with SOCCo.

SOCCo's suppliers are further encouraged to refrain from and/or limit the issuance of any promotional items involving SOCCo employees to reasonable business courtesies within accepted business practices and never with the intent to improperly influence a business decision or create a potential COI or the appearance of impropriety.

Any potential COI or contractual business relation with SOCCo's employees and family members are to be disclosed to the SOCCo supply chain representative for review prior to entering any business transaction.

5. Compete Fairly

SOCCo believes in the competitive market system where merit, quality, price, and other objective factors determine who is awarded the materials and/or services work by SOCCo. SOCCo suppliers must compete on the merits of their products and services rather than by any illegal or unethical business practice.

SOCCo's suppliers are expected to:

- Comply with competition and antitrust laws.

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- Compete honestly and fairly. Never make agreements with competitors to fix prices, rig bids, allocate customer markets, or exchange pricing information.
- Never use the exchange of business gifts and hospitality to gain an unfair competitive advantage.

6. Government Work

Suppliers who provide support to SOCCo's work on the DOE's federally funded projects at the PORTS site are expected to have sound understanding of government acquisitions and contracting laws, rules, regulations, and procedures.

7. Prohibit Bribery and Corruption

SOCCo maintains zero tolerance for bribery and expects suppliers to do the same. Bribery is directly or indirectly giving, or promising to give, anything of value to improperly influence actions of a third party. Bribes may include money, gifts, travel or other expenses, hospitality, below-market loans, discounts, favors, business opportunities, political or charitable contributions, or any direct or indirect benefit or consideration.

SOCCo's suppliers are expected to:

- Comply with all relevant anti-corruption laws in addition to SOCCo's contract terms and conditions related to anti-bribery and corruption.
- Refrain from offering or making any payments of money or anything of value to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence a business decision.
- Conduct appropriate due diligence and monitoring activities to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of third parties, including consultants.

8. Ensure Product Quality

Suppliers must take due care to ensure their work product meets SOCCo's quality standards.

SOCCo's suppliers are expected to have an effective process to:

- Identify defects and implement corrective actions and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements.
- Minimize the risk of introducing counterfeit parts and materials into deliverable products.
- Detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

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9. Reporting Concerns

SOCCo's suppliers and their employees should promptly report any business conduct and ethics concerns involving or affecting SOCCo, whether the concern involves the supplier or not, by contacting one of the following:

- SOCCo's Compliance, Ethics, and Employee Concerns Hotline: 1-844-279-1102
 - SOCCo's Compliance, Ethics, and Employee Hotline is a way for SOCCo employees, suppliers, and others to report activities that may involve illegal or unethical conduct of violations of SOCCo's expectations, Code, or Supplier Code "without any fear of reprisal." It is available to take calls 24 hours/day, 7 days/week. If preferred, a concern may be reported without providing any personal information.
- SOCCo's Compliance & Ethics Concerns designated e-mail:
ComplianceAndEthicsConcerns@ports.pppo.gov
- SOCCo's Compliance Manager: 740-897-3246
- SOCCo's General Counsel: 740-897-2610

A supplier may also be requested to assist SOCCo in the investigation of any ethics concern involving SOCCo and the supplier. SOCCo policy prohibits retaliation against any person reporting an ethics concern.

D. DEFINITIONS/ACRONYMS

1. **Code** – SOCCo's Code of Business Conduct and Ethics Policy (DND-HR-POL-00003)
2. **COI** – Conflict of Interest
3. **DOE** – United States Department of Energy
4. **PORTS** – Portsmouth Gaseous Diffusion Plant
5. **SOCCo** – Southern Ohio Cleanup Company LLC

E. APPENDICES/ATTACHMENTS

Appendix A, *Source References and Regulatory Requirements*

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Appendix A
SOURCE REFERENCES AND REGULATORY REQUIREMENTS

DND-HR-POL-00003, *Code of Business Conduct and Ethics Policy for Southern Ohio Cleanup Company LLC (SOCCo) Piketon, Ohio*