



UCOR

an Amentum-led partnership with Jacobs

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OWNER: Business Assurance & Compliance		PROC-IA-1001	REVISION: 4
SUBJECT MATTER AREA: Ethics		PREPARER: Dacey Romberg	Page 1 of 5
PROCEDURE TYPE:	Administrative <input checked="" type="checkbox"/>	CONCURRENCE/DATE: A. J. Reed 12/3/20 [Approval Signature on File]	
Emergency <input type="checkbox"/>	Alarm Response <input type="checkbox"/>		
TITLE: ETHICS PROGRAM		APPROVED BY/DATE: Dacey Romberg 11/18/20 [Approval Signature on File]	
USQD <input type="checkbox"/>	UCD <input type="checkbox"/>	CAT X <input type="checkbox"/>	EXEMPT <input checked="" type="checkbox"/>
EFFECTIVE DATE:		12/4/20	
USQD/UCD/CAT X No:		REQUIRED REVIEW DATE: 12/4/23	
Exhibit L Mandatory Contractor Procedure: No <input type="checkbox"/> Yes <input checked="" type="checkbox"/>		If an Interim Procedure, Expiration Date:	

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This document is approved for public release per review by:

Teresa D. Fancher 5/21/18

UCOR Classification and Date
Information Control Office

REVISION LOG			
Revision	Effective Date	Description of Changes	Pages Affected
4	12/4/20	Non-intent. Updated company logo and name. Changed Ethics Office to Ethics Officer.	All
3	6/15/18	Intent change. Revised to address DOE Order update, communication method changes, and other administrative changes. Form-446 is retired.	All
2	6/25/15	Non-intent changes to procedure and Form-446 to reflect owner and verbiage updates.	All
1	9/30/14	Intent Change. Modified to reflect current operations. Non-intent changes throughout to update acronyms and terminology.	All
0	2/9/12	Initial Release. Replaces BJC-IA-1001, Rev. 0, <i>Ethics Program</i> .	All

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PURPOSE This procedure establishes the UCOR, an Amentum-led partnership with Jacobs, Ethics Program. It provides UCOR employees (employees) and subcontractor personnel (subcontractors) with details, guidance, and expectations of the Ethics Program. The Ethics Officer is charged with developing employee directives, developing training and testing, establishing an independent and confidential process for raising ethical concerns, reviewing and evaluating ethical concerns, and reporting the activities of the Ethics Program. The Ethics Officer will ensure ethics concerns are handled promptly, fairly, and objectively.

SCOPE This procedure applies to all employees and subcontractors working on UCOR projects or scopes of work.

OTHER DOCUMENTS NEEDED

- Form-2962, Code of Business Conduct and Ethics Acknowledgement

WHAT TO DO **A. Code of Business Conduct and Ethics**

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| Ethics Officer | <ol style="list-style-type: none"> 1. Establish a Code of Business Conduct and Ethics (Code) incorporating Department of Energy (DOE) requirements from DOE Order 221.1B, <i>Reporting Fraud, Waste, and Abuse to the Office of the Inspector General</i>; DOE Order 221.2A, <i>Cooperation with the Office of Inspector General</i>; Federal Acquisition Regulation (FAR) 52.203-13, Contractor Code of Business Ethics and Conduct; and FAR 52.203-14, Display of Hotline Posters. 2. Ensure employees and subcontractors receive notice of the Code and that it is published and available on UCOR internal and external webpages. 3. Review and update the Code periodically in accordance with Company requirements. |
| Employee | <ol style="list-style-type: none"> 4. Read and understand the Code and how to report ethical concerns. 5. Upon hire, sign Form-2962, Code of Business Conduct and Ethics Acknowledgement, to acknowledge understanding of the Code and that continued compliance with the Code is one of the terms and conditions of employment with UCOR. |
| Subcontractor | <ol style="list-style-type: none"> 6. Acknowledge understanding and compliance of Ethics Program in accordance with their employer’s requirements. |
| Employee and Subcontractor | <ol style="list-style-type: none"> 7. Notify supervisor and the Ethics Officer when there is a change or potential change impacting their compliance with this requirement. |

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B. Ethics Training and Testing

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| Ethics Officer | <ol style="list-style-type: none"> 1. Develop Computer Based Training to ensure employees and subcontractors understand the Code and how to report ethical concerns. 2. Ensure employees and subcontractors complete annual Computer Based Training. |
| Employee and Subcontractor | <ol style="list-style-type: none"> 3. Complete all applicable Ethics Awareness training and testing as required by their assigned Training Position Description on their Position Assignment Form. |

C. Employee Communications

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| Ethics Officer | <ol style="list-style-type: none"> 1. Issue periodic communications to raise ethical awareness and emphasize management’s commitment to maintaining the highest standards of business conduct and ethical behavior. 2. Inform employees and subcontractors annually of their responsibilities to report actual or suspected allegations of fraud, waste, or abuse involving UCOR projects or scopes of work and to cooperate with the Office of Inspector General’s (OIG) office requests for information, interviews, and briefing. These requirements include not impeding or hindering another employee’s cooperation with the OIG or taking any form of retaliation or reprisal against individuals who report concerns or cooperate with the OIG. 3. Ensure the Ethics Helpline number is displayed on official bulletin boards in common areas and published on UCOR internal and external websites. |
| Employee and Subcontractor | <ol style="list-style-type: none"> 4. Read Ethics bulletin boards and communications. Direct ethical questions or concerns to their supervisor, the Ethics Officer, or the Ethics Helpline. |

D. Ethical Concerns

NOTE 1: Personnel who raise ethical concerns are referred to as the Concerned Individual (CI).

NOTE 2: CIs may identify themselves or remain anonymous. Their contact with the Ethics Officer will be kept confidential to the greatest extent possible.

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| Ethics Officer | <ol style="list-style-type: none"> 1. Establish an independent, anonymous, and confidential process for raising ethical concerns to the Ethics Office. 2. Ensure employees and subcontractors receive instructions on how to report ethics concerns including use of the anonymous Ethics Helpline or contacting the Ethics Officer by phone or email. 3. Administer the Ethics Helpline e-mail address and anonymous Ethics Helpline and maintain a record of calls received. |
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| Employee and Subcontractor | 4. Report any ethics concerns to their supervisor, the Ethics Officer, or the Ethics Helpline. |
| Supervisors/ Managers | 5. Report ethics concerns raised by employees or subcontractors to the Ethics Officer. |

E. Evaluation of Ethical Concerns

NOTE: Ethical concerns include non-compliance with the standards of business conduct and ethics described in the Code or allegations of fraud, waste, or abuse involving UCOR projects or scope of work. Concerns received that are normally addressed through other UCOR programs such as the Employee Concerns Program will be referred to the proper authority.

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| Ethics Officer | <ol style="list-style-type: none"> 1. Review all ethical concerns and inquiries received. 2. Document each concern received, investigations performed, and results obtained. 3. Review each concern for potential safety or security issues requiring immediate action, notification, or disclosure, and then take appropriate action. 4. Determine whether an investigation is warranted or other action is required, such as discussions with management or counseling employees. 5. Review each concern for jurisdiction and refer to a Subject Matter Expert, such as Internal Audit, Employee Concerns, Human Resources, or General Counsel, for investigation where appropriate. |
| General Counsel | 6. Determine if the available information and allegation warrant early disclosure to the DOE or the OIG. |
| Ethics Officer | 7. Ensure investigations are performed with objectivity, fairness, dignity, and maximum confidentiality and no employee is subject to retaliation for raising ethical concerns. |

F. Reporting

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| Ethics Officer | <ol style="list-style-type: none"> 1. Provide updates and resolution of the concern to the CI as appropriate. However, not all information obtained during an evaluation can be disclosed. Examples include the identity of other CIs, disclosure of employee disciplinary action(s), or case referral to law enforcement. 2. Provide a summary of the concerns or allegation received to the President and Chief Executive Officer and the Board of Managers. |
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- General Counsel **3.** Notify the OIG and the DOE Contracting Officer whenever, in connection with the award, performance, or closeout of this contract or subcontract thereunder, the Contractor has credible evidence that a principal, employee, or subcontractor of the Contractor has committed: (a) a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code; or (b) a violation of civil False Claims Act (31 U.S.C. §§ 3729-33).

RECORDS All Ethics Helpline and Ethics Office records will be retained in confidential files by the Ethics Officer. Records generated by this procedure and listed below shall be dispositioned in accordance with PROC-OS-1001, *Records Management, Including Document Control*.

- Ethics Officer **1.** Maintain and retain a log of concerns reported to the Ethics Office.
- 2.** Maintain and retain records related to Ethics Concerns.

- SOURCE DOCUMENTS**
- POL-UCOR-034, *Employee Relations*
 - PPD-IA-1003, *Code of Business Conduct and Ethics*