

# NWMO Code of Conduct



FEBRUARY 2011

**nwmo**

NUCLEAR WASTE  
MANAGEMENT  
ORGANIZATION

SOCIÉTÉ DE GESTION  
DES DÉCHETS  
NUCLÉAIRES

# NWMO Code of Conduct

## Scope

This Code of Conduct applies to all employees of the Nuclear Waste Management Organization. NWMO maintains separate policies on: Employment practices, transparency, communications, environmental responsibility, worker health and safety, and financial integrity.

## Policy

This Code of Conduct is based on NWMO's Mission, Vision and Values principles which include integrity, excellence, engagement and accountability.<sup>1</sup> We are committed to exemplifying these values in all of our business transactions and professional behavior. As individuals, NWMO staff will take these values as a minimum standard. **Compliance with the Code is required of everyone.**

## Requirements/Decision Rules

### Sensitive Information

Sensitive information may include (but is not limited to) technical information, research reports and data; prototypes; demonstrations; computer systems and passwords; financial data; business plans; personal information; and trade secrets. Employees will not in any way divulge, furnish or make accessible to any unauthorized person or organization, either during employment or any time thereafter, any confidential information entrusted to us relating to the business of NWMO, NWMO Member organizations or other parties, subject to disclosure that may be required by law, or which has the consent of the originating parties. At the end of our employment with NWMO, employees will be required to return to NWMO all confidential information acquired during our employment. We will not misuse information entrusted to us for purposes of NWMO business.

Additionally, we will adopt appropriate practices to ensure that sensitive information of a personal nature is kept confidential to respect and safeguard individual privacy of employees.

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<sup>1</sup> NWMO has created a full statement of its mission, vision and values. This is provided to all employees and its Advisory Council and Board of Directors. A copy of this statement can be found on our website and will be provided on request.

### **Company Assets**

NWMO assets include (but are not limited to) documents; computer systems & software; corporate logo and trademarks; facilities; telecommunications devices; information and office supplies. All members of staff must protect company assets, ensuring that they are used only for NWMO business and are safe from theft and destruction. Internet access (including email and VPN access) and the telephone system is available primarily for business purposes. For security reasons, employees must ensure that their computer and office access passwords remain confidential. At the end of employment with NWMO, employees will be required to return to NWMO all company assets acquired during the period of employment.

### **Intellectual Property**

All work (including, but not limited to, documents, research work and business plans) created by employees, agents, representatives, contractors, consultants or business partners on behalf of NWMO is designated as and remains the property of NWMO in perpetuity. NWMO and its employees will respect the intellectual property of others and will adhere to all laws and contracts relating to intellectual property.

### **Conflict of interest**

Employees are in a conflict of interest whenever our personal interests interfere in any way with the interests of NWMO. Employees may be in a conflict of interest whenever personal interests appear to interfere or could potentially interfere in any way with the interests of NWMO. All business decisions should be based solely on merit and not on any actual or potential financial gain or advantage for an employee, family members or friends. Employees will not be permitted to be directly or indirectly involved in a reporting relationship involving someone with whom they have a personal/familial relationship. In order to maintain the good reputation of NWMO and ourselves, employees should avoid any situation that may create (or even appears to create) a conflict of interest. Full disclosure is required of all employees.

While employed by NWMO, employees should not invest in any related business other than a holding of shares listed on a recognized North American stock exchange that does not exceed 5% of the outstanding shares so listed. However, any such holdings should not create the opportunity for even the appearance of a conflict of interest.

### **Integrity, Reputation, Gifts and Hospitality**

NWMO's integrity and good reputation is fundamental to the creation and maintenance of good relationships. Employees' deportment and demeanor must not reflect negatively on these. Accepting gifts may influence or appear to influence the ability to make fair and objective decisions. However, on occasion, it may be acceptable to give or receive a nominal businessrelated gift or hospitality. When necessary, employees should seek guidance in order to determine the appropriateness of the gift. Where not appropriate, gifts should be returned with thanks and clarification of our policy or suitably distributed in the community (e.g. donated to a charitable organization in the name of the gift-giver). Gifts having a monetary value (such as cash, gift certificates, loans, services and discounts) are not permitted. Attire must be appropriate for the work place.

### **Outside Business Activities**

NWMO supports employees who are contributing to our communities and to professional organizations. We also support employees who participate in all levels of political activities. Employees must make a full disclosure of all relevant outside business activities and ensure that there is no negative impact on NWMO as a result of our outside activities. Participation must take place during non-working hours and must not interfere or conflict with our responsibilities and obligations to NWMO. NWMO's supplies, facilities or other business assets must not be used, without prior approval, to support outside activities. Employees may not serve as a director or an officer of any organization that supplies goods or services to NWMO.

### **Compliance**

NWMO is dedicated to being an ethical company. Our founding corporate principles of integrity, excellence and accountability provide constant guidance and direct our standards and behaviour. Compliance is required of all employees. When beginning their term with NWMO, new employees will be trained about the Code of Conduct.

Staff must report and act on any breaches on the Code of Conduct. No one will be penalized or criticized for "whistle-blowing." Genuine and serious concerns must be brought forward as part of an employee's duty to NWMO. Where possible and appropriate, every effort will be made to maintain the confidentiality of the reporting employee.

Further, comparable standards of conduct are expected of our agents, representatives, contractors, consultants and business partners.

Complaints will be investigated through the President's office or through the Chair of the Board of Directors (as appropriate). The results of the investigation will be communicated internally and to the Chair of the Board of Directors. The accused party/parties will have the opportunity to answer all charges under the presumption of innocence.

### **Consequences of Non-Compliance**

The President shall report all Code violations to the Board of Directors. Those who do not comply with NWMO's Code of Conduct will be subject to disciplinary procedures up to and including dismissal and/or legal action.

By extension, parallel expectations and comparable associated consequences also apply to our agents, representatives, contractors, consultants and business partners.

**Approved by: NWMO Board of Directors**

**Date: February 15, 2011**

