



Code of Conduct

2026

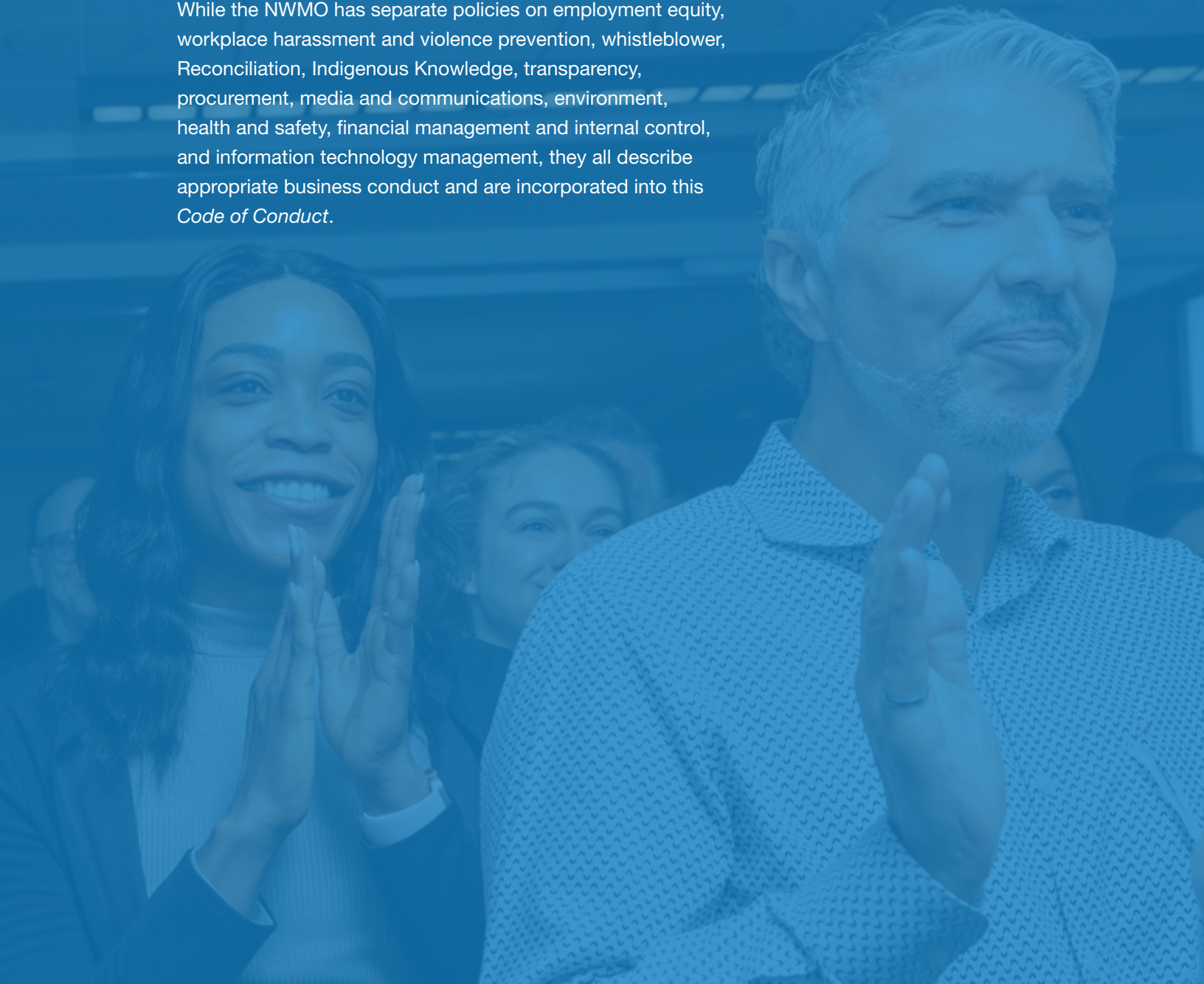
nwmo

NUCLEAR WASTE
MANAGEMENT
ORGANIZATION

SOCIÉTÉ DE GESTION
DES DÉCHETS
NUCLÉAIRES

Scope

This *Code of Conduct* applies to all of us — as directors, officers, employees and contractors of the Nuclear Waste Management Organization (NWMO). It is also expected that suppliers, agents, representatives, consultants, and other business partners and associates of the NWMO will abide by the high ethical standards reflected in this *Code of Conduct*. While the NWMO has separate policies on employment equity, workplace harassment and violence prevention, whistleblower, Reconciliation, Indigenous Knowledge, transparency, procurement, media and communications, environment, health and safety, financial management and internal control, and information technology management, they all describe appropriate business conduct and are incorporated into this *Code of Conduct*.



Our commitment to ethical conduct

At the NWMO, we are dedicated to acting with fairness, honesty, integrity and openness. This *Code of Conduct* applies to all directors, officers, employees, contractors and business partners. It sets out our expectations for behaviour and guides decision-making, ensuring we treat everyone with respect and dignity and uphold our mission and values in all interactions.

Our values in action

Grounded in shared purpose

Safety guides everything we do. We have a responsibility to keep future generations and the environment safe, including water.

Acting with openness

We are lifelong learners, unafraid to ask hard questions, seek answers and listen to feedback, and hold ourselves accountable as we move forward with our work. We work alongside Canadians, Indigenous Peoples and international partners to share what we learn and create a better future together.

Walking a Reconciliation journey

We strive to respect the rights, equity and well-being of Indigenous Peoples, and their spiritual connection to the land, in every action we take. We are grateful for the opportunity to learn from the expertise and lived experiences of Indigenous Peoples.

Creating a safe and respectful workplace

The NWMO is committed to providing a safe, healthy and inclusive work environment. Every individual has the right to work free from discrimination, harassment and violence. Employees are expected to comply with safety regulations, report hazards and demonstrate fitness for duty. Harassment, bullying and workplace violence are strictly prohibited and will not be tolerated. If you experience or witness inappropriate behaviour, report it promptly. Retaliation against those who raise concerns in good faith is forbidden.





Employment equity and human rights

We strive to eliminate barriers, foster a workforce that reflects the diversity of our communities, and respect Indigenous Knowledge and Reconciliation. Discrimination in any form, whether direct or indirect, is not acceptable. We are committed to employment equity and respecting the rights and well-being of all.

Misrepresentation or appropriation of Indigeneity — directly or indirectly presenting oneself as First Nations, Inuit or Métis for any reason (including to access opportunities or benefits intended for Indigenous Peoples) — is not acceptable and will not be tolerated. Where Indigenous self-identification is requested, information must be provided truthfully and in good faith.

Harassment and violence prevention

Harassment can include abuse of power, bullying or sexual harassment. A poisoned work environment — created by offensive jokes, texts or conduct — is also a form of harassment. Legitimate management actions are not harassment. Violence, including threats or physical altercations, is not tolerated. If you are affected by domestic violence that may impact the workplace, confidential support is available.

Managing conflicts of interest

Employees must avoid situations where personal interests conflict — or appear to conflict — with the NWMO's interests. Business decisions must be based solely on merit, and employees are expected to exercise good judgment and seek guidance whenever a situation may create a real, potential or perceived conflict. Outside business activities, community involvement and political participation must be disclosed and approved in advance to prevent conflicts.



Gifts and hospitality

Accepting gifts or hospitality is permitted only when they are of nominal value (under \$100) or culturally appropriate such as in Indigenous ceremonies, and all dealings with public officials must be transparent and fully compliant with anti-bribery laws.

Outside business interests

While employed by the NWMO, you are expected to devote yourself exclusively to NWMO business. You must not engage in secondary employment, consulting or other business activities — paid or unpaid — without prior written approval from your manager/supervisor and the Vice-President of Human Resources and Chief Ethics Officer. You also must not hold financial or other interests in organizations where such interests could conflict, potentially conflict or reasonably be perceived to conflict with the NWMO's interests.

Community, professional organizations and political activities

The NWMO supports participation in community and professional activities. However, if an outside activity is relevant to NWMO business or could intersect with the NWMO's interests, you must seek approval in advance through full disclosure. Activities must occur outside working hours, must not interfere with your job responsibilities and must not use NWMO assets or resources. Employees may not serve as a director or officer of any organization that supplies goods or services to the NWMO.

Familial relationships

Employees should generally avoid direct or indirect reporting relationships with their family members. However, recognizing that talent resources may be limited in remote communities, exceptions can be considered with full disclosure and provided that clearly defined reporting lines prevent conflicts of interest.

Dealing with public officials

All dealings with public officials must be transparent and reflect the integrity of the NWMO. Bribery in any form is strictly prohibited, including the direct or indirect offering, giving or receiving of anything of value intended to improperly influence a decision.


Procurement activities

Employees reviewing or selecting vendors must protect the integrity of the NWMO's procurement process. Disclose any actual or potential conflicts with suppliers in advance and keep proposal information confidential. Do not share proposal details with anyone outside the process, including other staff or suppliers.

Breach of conflict of interest

If you are uncertain whether a situation may place you in a real, potential or perceived conflict of interest, seek guidance before proceeding. You should consult your manager/supervisor or the Vice-President of Human Resources and Chief Ethics Officer to ensure appropriate steps are taken.

Social responsibility and environmental stewardship



At the NWMO, we conduct our business in a socially and environmentally responsible manner that respects applicable laws, Indigenous cultures and the human rights of the communities with which we work. We are committed to meeting all regulatory standards that protect the health, safety and security of people and the environment. Employees are expected to learn from and respect the cultures and communities they work in, engage with Indigenous communities and the public in a respectful, ethical and sensitive manner, and not tolerate human rights abuses (including the use of child labour or forced labour) or be complicit in any actions that contribute to such abuses. Concerns that a supplier or business partner may not meet the NWMO's standards for social responsibility or ethical conduct should be reported to the Vice-President of Human Resources and Chief Ethics Officer.

Honouring Indigenous Knowledge and Reconciliation

The NWMO is committed to honouring Indigenous Knowledge and advancing Reconciliation in all aspects of our work. We learn respectfully from Indigenous communities, the Council of Elders and Youth, and Indigenous Knowledge Holders, recognizing that each community's knowledge is rooted in its own history, culture and lived experience.

Indigenous Knowledge is shared through relationships built on trust and respect over time, and it does not become owned by the NWMO or an individual, once learned. Employees are expected to approach ceremonies, teachings and gatherings with humility, asking questions from a learning stance, following protocols and showing respect to Knowledge Holders and others who are learning.

We are committed to being transparent about how and from whom we learn, and to maintaining respectful and reciprocal relationships with Knowledge Holders. Reconciliation is both an individual and collective journey rooted in truth and shared through stories, experiences and dialogue. Creating space for Indigenous voices and acknowledging their value is essential to our commitment to ethical, culturally grounded practices.

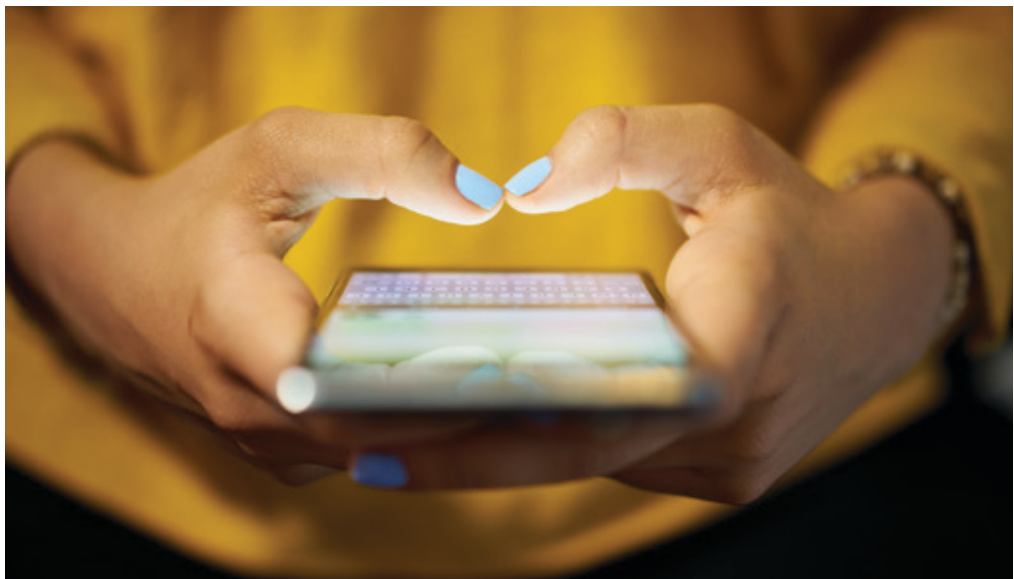


Protecting the NWMO's integrity and reputation

Our reputation is built on professionalism and ethical conduct. Employees are expected to represent the organization positively to the public in all circumstances, including in interactions on social media, during business travel and when working off premises. Only designated spokespeople are permitted to make official public statements, and comments or conduct — whether at work or outside work — that could harm the organization or our people are not acceptable.

Social media use

Employees are responsible for protecting the NWMO's reputation. While personal use of social media is permitted, employees must ensure their posts and interactions remain respectful, do not reflect negatively on the NWMO, and comply with this *Code of Conduct* and all related policies. Employees must not post or share statements — on any platform or in any setting — that are negative, defamatory, false or disparaging about the NWMO's mission, services, employees, partners or stakeholders.



Safeguarding information and company assets

Employees are entrusted with the NWMO's assets and confidential information. These must be protected and used responsibly, only for business purposes. Sensitive information should not be disclosed, except as required by law or with proper authorization. Intellectual property created for the NWMO remains the organization's property. Misuse of assets or information may result in disciplinary action.

Electronics use and access

Company information technology resources must be used appropriately. Unauthorized access, distribution of offensive material and misuse of equipment are prohibited. The NWMO reserves the right to monitor information technology usage.

Reporting concerns and seeking guidance

The NWMO encourages employees to raise ethical concerns or report violations of this *Code of Conduct*. Concerns can be discussed with supervisors, Human Resources, or the Vice-President of Human Resources and Chief Ethics Officer, and may be reported anonymously through IntegrityCounts. All reports are investigated thoroughly, and retaliation against those who report in good faith is strictly prohibited.

Consequences of non-compliance

Failure to comply with the *Code of Conduct* or its related governance or knowingly making false or malicious allegations may result in disciplinary action, including termination and/or legal proceedings.

Understanding and acknowledgement

All staff are required to review the *Code of Conduct* and its related policies and procedures annually, as well as successfully complete an annual knowledge assessment. New employees will receive the *Code of Conduct* during onboarding, and managers are responsible for ensuring that staff fully understand their responsibilities and the expectations outlined in this policy.

Related governing documents

- » *Whistleblower Policy*
- » *Environment Policy*
- » *Indigenous Knowledge Policy*
- » *Reconciliation Policy*
- » *Transparency Policy*
- » *Ethical and Social Framework*




External references

- » *Canada Labour Code*
- » *Canadian Human Rights Act*
- » *Employment Equity Act*

**For more information,
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