

Consultant Orientation to Standards of Conduct and Business Ethics (11/00)

It is the policy of BWXT Y-12, LLC (hereafter Company) that its acquisition and retention of business be conducted in accordance with the highest standards of honesty and integrity. Sales of its products and services must be free from even a perception that favorable treatment was sought or received, or that questionable activities were engaged in or condoned. Purchases of supplies, materials, and services from suppliers, vendors, and subcontractors must be conducted with the same high standards. Severe criminal and civil penalties may be imposed on and the individuals involved for violation of laws, federal and state, that affect the conduct of our business.

Company policies and procedures are designed to ensure compliance by all employees with applicable laws and regulations. These policies and procedures are embodied in the Company's *Standards of Conduct and Business Ethics* booklet. As a consultant to Company, even though you are an independent contractor, your performance of services may involve acts on your part which may be attributable to and for which the Company would be held liable. For that reason, it is necessary that you be made aware of and understand Company policies and procedures as they relate to your performance.

The *Standards of Conduct and Business Ethics* booklet contains provisions which directly affect the manner of your performance of services for the Company. Your attention is specifically called to the section of the booklet entitled *Guidelines for Specific Situations*:

The following guidelines are provided to illustrate the activities regulated by policies, procedures, and the *Standards of Conduct and Business Ethics*:

- At no time should you make, offer, promise or give, directly or indirectly, anything of value to a government official or any other person for the purpose of improperly influencing official actions or decisions in order to obtain or retain business for the Company. Under no circumstances whatsoever should you give, offer to give, or authorize the giving of any form of bribe, kickback or payoff, directly or indirectly, to obtain or retain business for, or direct business to the Company.
- Even though the recipient's standards of conduct may permit it, you should not give anything of value to any federal executive branch employee, civilian or military.
- If, in the performance of your consulting duties, you are in a position to deal as a representative of with a supplier, vendor, or subcontractor of, you should not accept from that supplier, vendor or subcontractor things of value. Under no circumstances whatsoever should you receive, or agree to receive, any form of kickback or bribe.
- While you are free to participate in the political process on a personal basis, you should not, on behalf of the Company, give anything of value, including your time, to any political party or candidate for office at any level, federal, state or local.
- Unless specifically directed by the terms of your consultant agreement, you should not engage in any lobbying efforts on behalf of with any executive or legislative branch member or employee of the federal or any state government.
- Requests for reimbursement of time and expenses, if authorized by the terms of your consultant agreement, must be accurate and truthful.

- At no time should any government official have any legal or beneficial interest in your business or in any payment that the Company may make to you for your services rendered or expenses incurred.
- You should not accept or attempt to obtain procurement sensitive data of the government that is not authorized for public release. Similarly, you should not accept or attempt to obtain any information of a competitor in circumstances where there is reason to believe the release or receipt of such information is unauthorized.
- You should not disclose to anyone without proper authorization proprietary information of the Company.
- If, in the performance of your consulting duties, you have occasion to meet with or communicate with customer personnel, you must ensure that all statements, communications, and representations made on behalf of are accurate and truthful.
- There may be times when, in the performance of your consultant duties, you learn of important information affecting the activities of or other companies with whom we are dealing that has not been publicly released. This is considered to be material inside information and you are required to maintain it in the strictest confidence. It is a violation of federal law to purchase or sell a company's securities using such information.
- In the performance of your consulting duties, you have an obligation to avoid financial, business, or other relationships which might cause a conflict with the performance of those duties, or which might be opposed to the interests of
- If at any time during the terms of your consultant agreement you have a question regarding the application of the *Standards of Conduct and Business Ethics*, or you feel that a subcontract task may cause a violation, you should advise your Subcontract Administrator.

By execution of this agreement, consultant acknowledges that he or she has received and read a copy of *Standards of Conduct and Business Ethics* and that he or she has read or had this Orientation read to them by a representative of the Company and that he or she fully understands its requirements and agrees to comply with them at all times.