

CODE of BUSINESS ETHICS & CONDUCT

June 2022



washington **river**
protectionsolutions
an **amentum**-led company

STATEMENT OF COMMITMENT

There must be a healthy tension that ensures balance between safety, compliance, and results for us to move the mission forward.

At Washington River Protection Solutions, we move the mission forward due to a healthy tension that ensures balance between safety, compliance, and results. We can't have one without the other two.

Our commitment to compliance, with **honesty, integrity and ethical business practices** is a critical part of the way we conduct ourselves – **it's how we earn our client's trust and respect.**

The WRPS Code of Ethics & Business Conduct outlines the legal and ethical guidelines that direct our business activities – **how we think, decide and act.** Our reputation on showing respect for each other and acting with integrity in our business dealings is paramount. We treat each other with dignity, never engaging in harassing or discriminating behavior, and strive to be good stewards of assets that belong to the Government and/or the Company.

Business integrity is woven into our cultural fabric – **we don't cut corners or bend the rules. Simply put – we do the right thing. Adherence to the code will lead us to the right outcome every time.**



To be successful in this area, it's critical that we include ethics as part of our daily conversation with our coworkers – making it part of our meetings, pre-job briefings and moment-to-moment interactions. **Integrity is a core value that must drive our decisions and behaviors.**

Each of us are obligated to act with the highest degree of integrity and full compliance with the code. If you suspect there is a violation, please report it.

You have my personal commitment that I will do my part to ensure the code is observed and honored – and I'm requesting the same from you.

You are the face and voice of our values and the key to our integrity. Please think before you act, and always maintain your commitment to do the right thing. Upholding the highest standards of safety and compliance will enable us to continue to move the mission forward on behalf of our Department of Energy client.

Wes Bryan

A handwritten signature in dark ink, appearing to read 'Wes Bryan'.

President and Project Manager

OUR MISSION, VISION AND CORE VALUES

We are committed to doing the right thing - always. This Code addresses our company's professional, ethical, financial, and business values. It sets company expectations for all employees. Our mission and vision define our purpose at Hanford and promote a culture of compliance.

Mission

Washington River Protection Solutions is committed to the safe and efficient management, retrieval and treatment of Hanford's radioactive and hazardous tank waste, to protect the nearby Columbia River.

Vision

Be ready to feed waste to the Waste Treatment Plant on schedule.

Core Values

The core values of WRPS are the cornerstone of who we are and what we stand for. They are the foundation for this Code and include the following:

- Safe – Actively care for each other's safety. Never fail to act on a situation that we believe may be unsafe.
- Innovative – Find ways to improve through new ideas and better solutions.
- Reliable – Consistent quality and performance. We are trusted. We do what we say, when we say we will do it. We go the extra mile to deliver on our promises.
- Technically Inquisitive – Avoid surprises, get in front of issues and risks, display behaviors and actions that meet the expectations of our stakeholders and our customer.

Integrity

Work with transparency to promote understanding and clarity.

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It's Up to You

INTRODUCTION

Getting to Know Our Code of Business Ethics and Conduct

The Company's commitment to managing our business according to our Code of Business Ethics and Conduct (the Code) is essential to continuing success as an enterprise. In any work environment such as ours, there is a need to establish standards of conduct. These standards help to provide a safe, pleasant and orderly workplace for all employees, suppliers and visitors. The Code characterizes the values of all employees and allows us to perform our work with the highest standards of legal and ethical conduct. Our Code is meant to provide guidance regarding these principles, however one document cannot possibly address every law, rule, policy or scenario we may encounter in our daily work, nor is it a substitute for exercising common sense and good judgment or seeking guidance when we need it.

There is both a management and an individual obligation to fulfill the intent of our Code. To help determine whether a particular action is appropriate, ask yourself the following questions:

- Would my action(s) comply with the intent and purpose of WRPS's policies, procedures, and Standards of Conduct?
- Would I feel comfortable doing this, or would it violate my personal standards of conduct?
- Is this action honest in all respects?
- How might this action affect others or the Company?
- Would this action embarrass me, or WRPS, if known to my coworkers, management, family, friends, or our Customer?

As employees we are entrusted with ensuring that the company's operations reflect responsible business practices. Simply put, good ethics means good business. It is the responsibility of every employee to read and understand the Code and adhere to it. Violations may result in disciplinary action, up to and including termination of employment. The Company also expects its consultants, subcontractors and other third parties to be aware of and adhere to these ethical standards. Failure to conduct business in an ethical manner may lead to termination of their contract.

WHAT DO I NEED TO DO?

As an Employee You Must:
Perform everyday business and activities leading by example, demonstrating compliance with the standards of ethical conduct, as well as company policies and procedures.
Demonstrate our core values in everyday business and activities.
Become familiar with this Code as well as company policies and procedures.
Comply with the applicable laws and regulations. If any of these standards appear to conflict, discuss the matter with your Manager, Ethics & Compliance, Human Resources, Employee Concerns Program (ECP), General Counsel, DOE, or DOE OIG.
Never try to conceal a person's failure to comply with a law, regulation, company policy, procedure or Standards of Conduct.
Never ask or allow another party, such as an outside agent or subcontractor, to perform an action that a WRPS employee is not permitted to do.
Report any questions or concerns about the company's business practices with management or other appropriate authority (see Reporting Suspected Violations on page 10).
Report suspected violations of the law or this Code of Business Ethics and Conduct to management or the respective authority (see Reporting Suspected Violations on page 10).
Cooperate and provide complete and accurate information related to investigations of misconduct.

In Addition, as a Supervisor/Manager You Must:
Promote a culture of compliance in which Employees understand their responsibilities and feel comfortable asking questions or reporting suspected violations without fear of retaliation.
Foster a spirit of ethics, integrity, and lawfulness by personally leading compliance efforts.
Never retaliate or tolerate retaliation, or the appearance of retaliation against any individual for reporting suspected violations, even if they go outside of the chain of command.
Ensure that Employees understand that business results are never more important than ethical conduct and compliance with this Code.
Promptly responding to alleged, or known, misconduct; contacting respective management, Ethics and Compliance, Employee Concerns or HR resources for assistance. (see Reporting Suspected Violations on page 10).

Any Supervisor/Manager who directs or approves of any conduct in violation of this Code, Company policies/procedures, Company Standards of Conduct or law, or who has knowledge of such conduct and does not immediately report it, will be subject to disciplinary action.

Thank you for your commitment to operating the Tank Farms with the highest ethical standards, fostering an environment based on integrity and transparency, and for conducting business in a respectful and compliant manner.

Integrity In Everything We Do

Integrity is indispensable to our mission. We act with honesty and adhere to the highest standards of ethical values and principles through our personal and professional behavior. We demonstrate our understanding of these values and principles and uphold them in every action and decision. We expect our actions to be consistent with our words, and our words to be consistent with our intentions.

The following principles set forth the standards for behavior that we must follow:

- Ethical behavior is the basis for everything that we do
- We are committed to treating people fairly
- Teamwork, mutual respect, trust, and open communication are the foundation of our culture
- We strive to be a responsible corporate citizen in the community
- We are committed to compliance with our Contract, DOE Orders, the laws, rules, and regulations applicable to our business
- We accept our responsibilities, share leadership in, and subject ourselves to the highest standards of public trust. We hold ourselves accountable for our words, our actions, our integrity, and honesty. Examples include (but are not limited to):
 - Owning our mistakes
 - Being forthcoming and truthful in written and oral statements
 - Integrity and honesty with exams, qualifications or tests
 - Integrity in procurement (Procurement Integrity Act)
 - Attendance at events associated with business travel such as meetings, conferences, and training
 - Procedure compliance
 - Good faith reporting of violations
 - Exhibit fiduciary responsibility when handling company and Government funds including timekeeping, use of government resources, business expense reporting and accountability

RESPECT AND CIVILITY IN THE WORKPLACE

Equal Employment, Nondiscrimination and Harassment-Free

The Company is committed to a civil workplace where everyone is treated with dignity and respect. Our differing backgrounds, experiences, and perspectives give us the strength to lead and reflect our commitment to diversity. For these reasons, we will not tolerate discrimination or harassment in the workplace. We all have the responsibility to treat coworkers, applicants for employment, customers, and other stakeholders with respect and in a fair, non-discriminatory manner.

All employment decisions such as recruitment, hiring, classification, job assignments, benefits, training, transfer, layoff, recall, promotion, pay, testing, and termination are based on merit and business needs. Applicants for employment and employees are treated in accordance with state and federal laws and regulations that prohibit discrimination based on sex, age, ancestry, color, disability, marital status, national origin, race, religion, sexual orientation, gender identity, genetic history, physical or mental disability, pregnancy, citizenship, veteran status, or any other classifications protected by law.

A respectful workplace is defined as not engaging in or tolerating any form of harassment. Harassment is a form of

employment discrimination and is a form of unwelcome conduct that is based on race, color, religion, sex (including pregnancy), national origin, age, disability, or genetic information. It is unlawful where enduring the offensive conduct becomes a condition of continued employment, or the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. Offensive conduct may include, but is not limited to, offensive jokes, slurs, epithets or name calling, physical assaults or threats, intimidation, insults, offensive objects or pictures, and interference with work performance. Harassment can occur in a variety of circumstances.

Anti-discrimination laws also prohibit harassment against individuals in retaliation for filing a discrimination charge, testifying, or participating in any way in an investigation. This type of behavior has no place at WRPS.

If you feel you or someone else is being harassed or discriminated against, report your concerns to management, Human Resources, Employee Concerns, or the General Counsel's Office.

REPORTING SUSPECTED VIOLATIONS

Duty to Report

Why is Reporting Important?

It is important to raise concerns. Doing so reinforces our commitment to act ethically in every business decision we make. Early detection allows us to address concerns before they become widespread problems, and to take corrective actions if necessary. Above all, we are committed to maintaining a safety conscious work environment. A culture where each of us feels comfortable asking questions, speaking up, and working towards solutions.

Do I have a Duty to Report?

Yes. All employees and subcontractors have the responsibility and duty to report the identified wrongdoing to an appropriate authority (such as: supervisor, member of management, Employee Concerns Program, Office of General Counsel, Ethics and Compliance Program, DOE or DOE Office of Inspector General) all allegations of fraud, waste, abuse, misuse, corruption, criminal acts, and or mismanagement relating to DOE programs, operations, facilities, contract, or information technology systems.

No employee is authorized or required to carry out any order or request to conceal or

cover up an unethical or dishonest business transaction. Any employee receiving such an order or directive must report it. Examples of issues to be reported:

- Contract and procurement irregularities, such as cost, labor, or equipment mischarging;
- Falsifying time or expense sheets;
- Bribery and/or acceptance of inappropriate gifts;
- Conflicts of interest (either personal or organizational);
- Theft and/or abuse of government or Company property;
- Non-reporting of an on-site vehicle accident (or off-site with a government vehicle) or falsification of a vehicle accident report;
- Falsifying or directing another to falsify a document; and
- Safety, health, and environmental protection non-compliances or violations.

The Office of General Counsel should be contacted if there are any questions relating to the interpretation of laws or regulations, and their applicability to the operations of Tank Farms.



Raising Concerns And Zero Tolerance For Retaliation

Employees are encouraged to resolve work-related issues and/or concerns with their immediate supervisor. However, all employees have the right to utilize any of the many avenues provided to address your concern. If you have a work-related concern you may choose to first discuss it with your manager or the appropriate functional organizations including:

- Human Resources or Labor Relations
- Ethics and Compliance
- WRPS Employee Concerns Program
- Office of General Counsel
- Environmental, Safety, and Health Professionals, or Subject Matter Experts
- HAMTC Stewards and Safety Reps
- Employee Accident Prevention Councils
- Problem Evaluation Request (electronic) system
- Internal Audit
- Differing Professional Opinion Process (for environmental, safety, health, technical, and quality issues)
- Alternate Dispute Resolution Service (1-888-891-6149)

You may remain anonymous, if you choose this option, please leave as much detail as possible.

WRPS Ethics and Compliance Program Hotline – 509-373-4122

WRPS Employee Concerns Program Hotline – 509-373-5444

If you are not comfortable with going to your manager or you believe that management has not taken the appropriate action, there are many alternate avenues for the reporting of concerns such as the Department of Energy ECP or Department of Energy Inspector General.

You may remain anonymous. If you chose this option, please leave as much detail as possible.

DOE ORP Employee Concerns Program – 509-376-1934

DOE Office of Inspector General – 1-800-541-1625

Employees are protected by law when they raise a concern that they reasonably believe reveals actual or potential damage to the environment, public health or safety, workplace safety, waste, fraud, or abuse. Should any retaliation by any employee be substantiated, the Company will take prompt and appropriate actions, including disciplinary actions up to and including termination of employment.

Any employee who believes they are being retaliated against as a result of raising a concern, or who has any questions regarding the implementation of this policy should contact the WRPS Employee Concerns Program.

Responding to Investigations

We are expected to fully cooperate with any legitimate internal or external auditors or investigators who request information in connection with our company. Always provide accurate and complete information. When responding to external information or audit requests, coordinate with the General Counsel's Office or the Internal Audit Department. In addition, do not attempt to improperly influence any auditor, regulator, or investigator, or encourage anyone else to do so.

You must never destroy or alter any documents or electronic records, lie to or mislead an investigator through commission or omission, or obstruct the collection of information that relates to an investigation, audit, or any legal action brought on behalf of, or against, WRPS.

To the greatest extent possible, the Company will cooperate with internal auditors or investigators or external government agencies responsible for investigating suspected violations of law, and cooperate with outside audits/inspections/investigations to coordinate requests with appropriate WRPS management or WRPS organizations to determine legal and information disclosure requirements.



AVOIDING CONFLICTS OF INTEREST

Personal Conflicts of Interest

We all have a stake in acting in the best interest of the Company. It is crucial that we avoid conflicts of interest, whether actual, potential, or perceived.

A Conflict of Interest occurs when one's personal or financial interests interfere with the ability to make objective business decisions on behalf of the Company. It is required that conflicts are identified, declared, evaluated and, if required, mitigated.

An Appearance of a Conflict of Interest is a situation that could give rise to the perception that a conflict exists and may interfere with the ability to make business decisions on behalf of the Company.

Conflicts can arise through many situations including, outside employment, financial interest in an outside business, customer and supplier relations, family relationships, household members, friendships, dating relationships, gift giving, charitable activities, and even public service.

Household Members/Family Members Include: employee, employee spouse, significant others, dating partners, child, parent, brother, sister, mother-in-law, father-in-law, sister-in-law, brother-in-law, daughter-in-law, son-in-law, roommates, cousins, aunts, uncles, or any other person where the relationship could lend itself to an actual, potential or perceived Conflict of Interest.

At times we may find ourselves working with family members or others with whom we have close ties. While this may not always result in an issue, it can in many cases lead to perceived favoritism. For this reason, an employee may not:

- Hire, supervise, report to, review, or influence the job evaluation or compensation of another employee with whom they have a close personal relationship;
- Participate in or make a procurement decision that could benefit themselves, a relative, or a friend; or
- Engage in an intimate or romantic relationship with a direct or indirect report or supervisor.

Whether or not you believe you have a conflict to disclose, all employees, subcontractors, consultants and other third parties, must complete and submit a Conflict of Interest Disclosure form. You have a continuing duty to update this Disclosure as soon as facts or circumstances arise which could create an actual or perceived conflict of interest or could render a previous Disclosure invalid or incomplete.

Failure to disclose a Conflict, either actual, potential, or perceived, may be determined to be misconduct in accordance with TFC-BSM-HR_EP-C-02, Employee Discipline, and subject to disciplinary actions as outlined in this procedure.

Organizational Conflicts of Interest

Organizational Conflict of Interest means that because of other activities or relationships with other persons, a person is unable or potentially unable to render impartial assistance or advice to the Government, or the person's objectivity in performing the contract work is or might be otherwise impaired, or a person has or gives another organization or person an unfair competitive advantage. An unfair competitive advantage exists where a contractor competing for award of any Federal contract possesses—

- (1) Proprietary information that was obtained from a Government official without proper authorization; or
- (2) Source selection information (as defined in FAR 2.101) that is relevant to the contract but is not available to all competitors, and such information would assist that contractor in obtaining the contract.

Organizational Conflicts of Interest primarily arise as a result of one of the three situations:

Biased Ground Rules: Situations in which an organization, as part of fulfilling a contract, has set the ground rules for another contract, for example, by writing the statement of work or the specifications. In these “biased ground rules” cases, the primary concern is that the organization could skew the competition, whether intentionally or not, in its own favor. These situations may also involve a concern that the organization, by virtue of its special knowledge of the customer's future requirements, would

have an unfair advantage in competing based on those requirements.

Impaired Objectivity: Situations where an organization's work under one contract could entail evaluating itself, either by performing an assessment of work completed under another contract or by evaluating proposals. In these “impaired objectivity” cases, the concern is that the organization's ability to render impartial advice to the customer could appear to be undermined by its relationship with the entity whose work product is being evaluated.

Unequal Access to Information: Situations in which an organization has access to non-public information as part of its performance of a contract and where that information may provide the organization a competitive advantage in a later competition for a second contract. In these “unequal access to information” cases, the concern is limited to the risk of the organization gaining a competitive advantage; there is no issue of bias.

You must also be careful to avoid Organizational Conflicts of Interest as the guidelines and restrictions for Government procurement are very strict. We must never hire subcontractors who have an unfair competitive advantage.

Your early identification and timely communication of potential conflicts of this nature allow us to continue to participate in new business opportunities and reinforce our intention to conduct business with integrity.



Political Contributions, Political Lobbying Activities

WRPS respects the integrity of the political process; however, employee involvement and participation in the political process must be on an individual basis, on their own time, at their own expense, and without the use of government resources such as computers (e.g. e-mail), photocopiers, telecommunications equipment, or internet access.

- Making of any federal grant or loan
- Entering into any cooperative agreement using federal funds
- Extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement

Federal law prohibits the use of federal funds to influence or engage a consultant to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress. This applies in connection with the following:

- Award of any federal contract

Political activities may not be conducted on WRPS premises. You must be aware of, and avoid, conflicts of interest that can arise if you campaign for or hold public office or serve on commissions. If you plan to seek or accept a public office, you must consult with the Office of General Counsel or Ethics and Compliance.

Gifts, Gratuities, and Entertainment

When we are conducting business, all employees should be aware of limits to giving or receiving gifts and gratuities, and to entertaining clients or business associates. Federal rules are very specific about how one can and cannot entertain federal employees. No offered or accepted gift should ever be allowed if it could in any way be perceived as a bribe or kickback. Seek advice from Ethics and Compliance or the Office of General Counsel if you have any questions.

Accepting or Offering Gifts to/from Subcontractors, Suppliers, Vendors, or Non-Federal Clients, Employees, and Officials

You may accept or offer gifts or entertainment to/from vendors designed to establish and maintain ethical business relationships (with your supervisor’s approval), ***if the gifts or entertainment are nominal in value, not related to or the result of a purchasing decision, and with no expectation for any improper advantage or expectation***

that a business relationship will be unjustly influenced. Entertainment includes such things as business meals, attendance at sporting events, concerts, or similar functions. Do not accept or offer gifts, gratuities, or other items of value from any person or entity that result from a procurement decision, intending by such offer to affect your purchasing decision.

Offering Gifts to Federal Clients, Employees, and Officials

Federal regulations allow Federal employees to receive “unsolicited gifts” having an aggregate value of \$20 or less (not to exceed \$50 in a single calendar year) subject to certain restrictions. The regulations also allow limited entertainment, including food and refreshments, of nominal value (again, \$20/\$50), e.g., entertainment at a hospitality room. However, under no circumstances may a gift – regardless of the value -- be offered, or received, that is intended to influence an official action.

ETHICAL AND COMPLIANT BUSINESS PRACTICES

Fundamentals of Business Data and Information

All TOC Team Members are required to ensure that all data and information is Current, Accurate, Complete, Repeatable, Auditable, and Compliant/Trustworthy with applicable governing requirements. This data and information condition is achieved through performance of validation checks, ensuring our data and information is trustworthy, and can be reliably used by stakeholders to make informed decisions.

Data and information that contain anomalies (with respect to the core values in the paragraph above) must be identified, and resolved (if possible) or reconciled to avoid any misrepresentation, misinterpretation, misunderstanding, or misuse of the subject data/information.

These business fundamentals apply to individually, organizationally, and or system generated data and information. Knowingly passing data which is NOT Current, Accurate, Complete, Repeatable, Auditable, or Compliant/Trustworthy or willfully bypassing/manipulating validation checks or the lack of validation checks, without full disclosure/identification/annotation is considered a violation of these “Ethical and Compliant Business Practices” found in this “WRPS Code of Business Ethics and Conduct”



Time Reporting

All employees and subcontractors should be aware that time card falsification is a federal crime. Under the False Claims Act (31 USC 3729), it is illegal for any person to knowingly present a false or fraudulent claim for payment or approval to the federal government; and it is illegal for a person to knowingly make or use a false record or statement material to the payment of a false or fraudulent claim. Additionally, civil penalties ranging from \$10,957 to \$21,916 per occurrence exist under the False Claims Act for falsification.

The WRPS time recording system and contracted labor time recording systems are an essential part of the company's accounting system and reflects each employee's work. Employees and subcontractors are responsible to comply fully with WRPS time recording procedures including:

- Accurately record time worked on a daily basis at the end of the day or in the morning for the previous day;
- Properly code time to the correct cost account (i.e. projects/activities worked); and,
- Report knowledge of falsified time sheets.

Each employee/subcontractor is responsible for the information submitted on their time card. By an employee's/subcontractor's submittal and/or concurrences in the Time Information System (TIS) or Contracted Labor Time Reporting (CLTR) system, the employee/subcontractor affirms that the time and attendance data are true, accurate, and complete. When submitting time and attendance data, the employee/

subcontractor acknowledges awareness and understanding of his/her responsibilities under applicable requirements. If the time card is submitted by someone other than the employee, it is the employee's/subcontractor's responsibility to review the time card and make corrections if needed.

When a manager/approval delegate approves and/or concurs with a submittals in TIS or CLTR, he/she represents to the best of his/her knowledge and belief that the time and attendance data submitted are true, accurate, and complete and in accordance with applicable requirements. When approving time and attendance data, the approving official acknowledges awareness and understanding of their responsibilities under applicable requirements.

Manager/Approval Delegates and Persons-in-Charge/Field Work Supervisors should have reasonable knowledge of the work performed and time spent by the employees/subcontractors on the associated tasks. Various techniques are available to obtain reasonable assurance including, for example, reviewing the employee's/subcontractor's work output or periodically calling or visiting the work site during the scheduled work period.

Compliance checks are unannounced reviews of time-keeping practices used to monitor controls. Finance staff conduct periodic reviews to ensure recording of labor hours is in accordance with applicable requirements. Employees are required to provide time-keeping related information to these finance personnel, treat them with courtesy and respect, and answer all questions honestly.



Accounting and Reporting

Even if maintaining financial data is not your primary job duty, each of us contributes to record keeping in some form, such as completing timecards, submitting travel and expense reports, or keeping safety records. Honest and accurate accounting for costs incurred in the execution of our work is a paramount responsibility of everyone. This includes the responsibility to ensure allowable and unallowable costs for our Tank Farm work are properly segregated. Proper accounting and compliance with accepted accounting principles and procedures is required at all times. This is all part of our fiduciary responsibility for Company and Government funds and assets.

We have established and maintained a system of internal accounting controls providing assurance that transactions properly and accurately reflect business and operations. The WRPS accounting system meets the highest standards of honesty and integrity in accordance with accepted accounting principles. Our approved accounting procedures are designed to meet federal and state accounting requirements. These procedures must be followed as applicable.

We commit to thoroughly collecting and accurately reporting our business and operations cost and financial information. It is every employee's responsibility to accurately and honestly account for costs in support of claims for project cost and schedule to ensure accurate representation of the variances. No false, artificial, or misleading

entries shall be made in WRPS financial records. No payment shall be requested, approved, or made with the intention that any part of such payment is to be used for any purpose other than that which is described in the documents supporting payment.

Employees are reminded that "allowable" costs include only those costs that are directly associated (i.e. within the Contract scope) with the performance of Tank Farm work and that are incurred in accordance with applicable laws and regulations. The Business Operations organization should be contacted if there are questions regarding allowability or accounting for costs.

Information captured in the Business Management System (BMS) provides accurate and reliable records that are critical to meeting the financial, legal, and management obligations of WRPS. All reports, vouchers, bills, payroll and service records, measurement and performance records, and other essential data should be prepared promptly, carefully, and honestly, and treated with discretion. Circumventing of internal controls is not tolerated. Our Internal Audit Department periodically audits WRPS financial transactions and processes.

If you notice any accounting or auditing irregularities, or incidents of potential fraud, you should report your observation to management, the Ethics and Compliance Program Office, or the Office of General Counsel.

Traveling on Official Business and Expense Reporting

Employees planning official travel, including foreign travel, must process and report travel plans according to applicable travel and security procedures. Prior to traveling, all travelers must secure an approved Travel/Conference Attendance request form (approved by Manager and Controller or designees).

The Company's intent is that an employee does not lose or gain financially as a result of company business travel. While traveling on authorized business, employees are expected to spend the company's money as carefully as they would their own and only incur reasonable and necessary expenses. Employees must ensure that their behavior and attendance at all meetings/sessions/events for which is the purpose of the travel, reflects positively on their own reputation as well as that of WRPS. It is the responsibility of the traveler to have knowledge of the applicable per diem rates for the areas in which the travel will

occur and to obtain government rates or rates which are comparable to government rates. Travelers must ensure that expense reporting is factual and represents allowable expenses incurred in performance of travel on company business. Travel expenses should be submitted promptly and will only be repaid according to procedure.

The traveler's manager is responsible for approving the travel and expense reports. ALL expense account reporting must be accurate and descriptive of the actual transaction. Never seek reimbursement for non-business expenses or duplicate reimbursements. Expense Reports are WRPS business records and must accurately and clearly represent expenses consistent with WRPS expense reporting procedures. Falsification of records or reports is considered extremely serious misconduct. Employees must report any falsification of reports or records to WRPS Ethics and Compliance.

Purchasing Card (P-Card)

The Purchasing Card (P-Card) is used to simplify and streamline the acquisition process for small dollar procurements of goods. All employees who have been issued a P-Card must assure that only legitimate and proper purchases are made consistent with WRPS requirements. P-Card holders must exercise prudence and integrity in the management of resources in their custody and in all fiscal transactions in which they participate and not knowingly be party to or condone fiscal misconduct. They must expose corruption whenever discovered and protect privileged or confidential information to which they have access by virtue of their position.

Designated P-Card holders are required to complete a P-Card training class, sign a "Card Holder Agreement" form before receipt of the card, and protect the security of the P-card and the P-card number. Card holders are also required to complete and submit an

annual Conflict of Interest form and provide the form to the P-Card Administrator.

The P-Card holder's manager is also required to receive training to assure proper use of the P-Card. The manager is required to sign the P-Card Holder's Transaction Approval Reports, which are to be kept on file for auditing purposes. The P-Card Holder's Manager, the Procurement Services Manager, or the P-Card Administrator, may deactivate the P-Card at any time if deemed to be in the best interest of the company. WRPS will treat misuse as a violation of the Code of Business Ethics & Conduct, and when appropriate, refer such misuse to law enforcement officials or the Office of the DOE Inspector General for further investigation/prosecution.

P-Card holders have strict rules that they must follow. Do not ask a card holder to make purchases outside of procedure or fraudulently.

PROTECTING OUR ASSETS

Keeping our Workplace Safe

We are committed to the highest standards in safety and health performance and to be a model of excellence in the performance of safe, quality work. This requires conviction and dedication in how we approach our work, balance our priorities, how innovative we are in our work processes, and how we

care for ourselves and our fellow workers. This dedication should never promote intimidating behavior, threats or acts of violence in our workplace. The safety and health of our employees will take priority whenever conflicts with production or other objectives occur.

Commitment to Safety

Everyone who works for or with WRPS knows that safety is our hallmark. Our reputation depends on our continued pledge to the safety and welfare of our employees, customers, vendors and subcontractors. Providing a safe and secure work environment gives us a competitive advantage in attracting the best applicants and retaining our valuable workforce.

Our Accident Prevention Councils, including the Employee Accident Prevention Council (EAPC), encourages employees to adopt a lifestyle of safety and health at work and at home, and offers a variety of tips and strategies to raise awareness and inspire opportunities to increase safety and health. Additionally, EAPCs and the EAPC Safety Books are another avenue to communicate or report a safety concern or issue.

No Weapons or Workplace Violence

Weapons are not allowed in the workplace. Acts of violence, as well as threatening remarks or gestures, conspiring to take action, or other disruptive behavior in the workplace are unacceptable. This includes

intimidation, stalking, bullying, or any physical act of violence. This expectation of ethical and civil behavior applies when you are on company business in any capacity, both on and off-site.

Drug and Alcohol-Free Workplace

The company prohibits the possession, use, dispensing, distribution, manufacture, sale, or presence of any intoxicants, alcohol, narcotics, hallucinogenic, depressants, stimulants, or other such drugs (e.g., controlled substances, except where legally prescribed) anywhere on the Hanford Site or any company or government location.

Additionally, we require employees and subcontractors at a work location or on the job to come to work free from the negative effects of drugs or alcohol and be able to safely perform all of their job duties. To help employee's comply with our commitment to a safe and drug-free workplace, employees are encouraged to seek assistance to overcome drug or alcohol dependency or addiction through the Employee Assistance Program.

If you believe you are subject to or witness inappropriate, unsafe conduct, you must report it as soon as possible to a supervisor/manager, Hanford Security, Human Resources, or any member of senior management. If you ever face an immediate threat to your safety or that of your colleagues on the Hanford site, call 911 immediately. If you have a cellular phone and you need on-site emergency assistance, dial 509-373-0911. DO NOT hang up if you accidentally dial 911 from your cell phone. Simply explain the situation to the emergency dispatcher. If you have a non-emergency to report, e.g., theft or a security concern/observation, contact the Hanford Patrol Operations Center (POC) at 509-373-3800, and then report the incident internally.



Environmental Stewardship

WRPS is an active steward of the environment and conducts business in an environmentally responsible manner. The company endeavors to comply with all laws and regulations impacting environmental quality as well as health and safety requirements.

We have a commitment to perform work through methods that meet or exceed federal, state, and local environmental requirements, assure the safety and health of workers and the public, and achieve the highest levels of quality. All aspects of work planning and execution by WRPS are to be performed within the structure of the Environmental Management System (EMS), an integral component of the Integrated Safety Management System (ISMS).

All employees are expected to conduct business in an environmentally responsible manner by planning and conducting work with the objectives of continual improvement, environmental stewardship, integrity, accountability, and transparency. These objectives shall be met through regulatory compliance, environmental sustainability, life cycle considerations, and environmental risk management.



Security

Every employee has a duty to protect government property and controlled-use information from internal and external security threats, and to report any breach of security to their supervisor or Hanford site security personnel.

We have a commitment and a contract duty to exercise reasonable care and to ensure the adequacy of our security programs for the protection of our employees and government property.

Protection of Infrastructure and Facilities

We are committed to providing a work place that is secure from outside threats to our facilities and employees. This is accomplished by employee badge challenges, access control devices (proxy card reader, locked doors, etc.), and increased vigilance, both inside and outside of our facilities. This includes the protection of your badge from damage, theft, and duplication (e.g. not having your photograph taken with your badge on or posting related items online).

Mail

Increased attention and caution is advised when opening mail received from unknown sources. If you suspect that mail contains any unknown substance or suspicious object, immediately call 911 or 509-373-0911 on a cell phone.

Report Security Events

Immediately report possible security incidents to the Patrol Operations Center (POC) at 509-373-3800. The POC will make all other necessary notifications and dispatch Hanford Patrol to investigate, if the situation warrants. These incidents should also be reported to your immediate supervisor and WRPS Security.

Computer Files

Computer security requires constant vigilance to protect against loss of sensitive information. Employees are reminded to safeguard their password and computer files. Computer security is a shared responsibility and a key part of computer use.



Computer Usage

Just as we have a duty to protect the Government's assets, we share an obligation to use the computer resources, networks, internet, and email systems responsibly and securely. These resources are provided for official government business purposes, and are intended to be used for such. While WRPS allows limited personal use as permitted by applicable DOE Orders and limited use policies, it must be kept to a minimum and not detract from our work.

Using government facilities or equipment for unauthorized, abusive, unethical or inappropriate purposes will not be tolerated. Never overuse or abuse company assets for your personal use or gain or to conduct work on behalf of others. When taken too far, it can even be fraud or theft. You must also take care to avoid improper use such as:

- Frequent personal use that may cause congestion, delay, disruption of service to any government system such as streaming
- Material that ridicules others on the basis of race, creed, religion, color, sex, disability, national origin, or sexual orientation
- Material that is illegal, inappropriate, or offensive to a reasonable person
- Creating, downloading, viewing, storing, copying, transmitting sexually explicit or sexually oriented materials

- Fundraising, other than company sponsored (such as the United Way campaign)
- Lobbying or political activity
- Any activity related to a personal business
- Communicating official company business on behalf of WRPS to external news groups, bulletin boards, or to other public forums without authority
- Use of company-supplied computers to obtain protected information by accessing another computer without authorization can result in the imposition of civil and criminal sanctions
- Releasing, not securing or utilizing Personally Identifiable Information (PII) for unauthorized purposes

The privilege of using government resources for personal use may be revoked or limited at any time if it is determined that the privilege, including noncompliance with software licensing obligations, has been abused or misused.

All other use of government resources for non-authorized or non-sanctioned activities is prohibited, may result in the activity being identified as an unallowable cost, and could result in disciplinary action, loss of employment and/or criminal prosecution.

Confidentiality of Information and Records

Keep our business and client information confidential. When in doubt do not disclose information and guard against inadvertent disclosure.

Many facets of our operations are confidential or business sensitive. Improper disclosure can create serious financial or competitive losses or disadvantages to the company. In addition, such disclosure can result in legal liabilities to the company and individual employees. Examples include but are not limited to:

- Negotiations (including contract, procurement and union, etc.)
- Financial data
- Work in progress
- Work methods
- Names of clients
- Public and private client agreements
- Personally Identifiable Information (PII)

We must never reveal confidential or business sensitive information to any outside parties unless we are properly authorized or legally required to do so. In addition, we may not disclose such information to our co-workers who do not have a legitimate “need to know”.

We also have a duty to protect employee information in accordance with applicable legal requirements. No one should access prospective, current, or former employee records without proper authority.

Individuals who generate, review, have custody, or otherwise has access to Official Use Only (OUO) or export controlled information have the responsibility to identify, mark and protect the information as appropriate.

If you discover or suspect the unauthorized use or release of confidential information, notify Management, the Office of General Counsel, or the Ethics and Compliance Program immediately.

Government Property Accountability

All employees are responsible for using government property for WRPS government business and protecting it from loss, theft, fraud, unauthorized personal use, and negligent misuse.

Government property is to be used for WRPS government business and is to be protected from loss, damage, theft, and destruction. All government property under WRPS’ control is to be managed in accordance with Contract regulations and direction, sound industry practices, and accepted accounting principles. All WRPS employees and subcontractors are expected to be accountable for the proper utilization, care, and control of government property within their custody and/or organization.

Management control of government property is initiated promptly upon receipt. Government property that is sensitive (e.g. computers, laptops, tablets, digital cameras >\$1,000, etc.) and/or property that has value greater than \$10,000 is marked or tagged for identification and recorded in the WRPS property system, assigned a custodian and location, and tracked for accountability and financial purposes in

accordance with government requirements. This applies to government owned facilities and equipment assigned to WRPS and its subcontractors.

All Property Administrators, Custodians and/or users of government property are responsible for providing the location and status of tagged property at the request of Property Management to support assessment and inventory requirements.

All employees shall immediately report any missing, damaged, or destroyed government property to their manager, the Property Management Department, or to the Ethics and Compliance Program Office. This includes specified instances of loss, damage, theft, or destruction of government property, including buildings, facilities, equipment, instruments, tools, materials, supplies, and government vehicles.

All employees should identify property that is no longer necessary to perform Contract work to their manager or the Property Management Department as soon as it becomes known so property can be reutilized or transferred for disposal.



IT'S UP TO YOU

WRPS's reputation and success as a good corporate, community and government citizen depend upon each of us meeting our obligations under this code. If you have any questions or do not understand what is expected of you, it is your duty to raise your concern with your manager, human resources, general counsel or ethics and compliance.



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protection solutions
an **amentum**-led company