



Code of Ethics

**a principled
way of working**



Welcome to our Code of Ethics

This Code outlines the principles that govern how AWE conducts its business. It also sets out AWE's responsibilities to its stakeholders and describes how AWE expects those working on its sites to behave in respect to the company's values as well as the relevant legislation and regulation that controls the operations on our sites.

This Code should be read in conjunction with other company policies and relevant UK legislation.

A message from our Managing Director

At AWE we are committed to our four core values:

- **Pride**

We recognise past achievement and are proud to contribute to our nation's security

- **Excellence**

We deliver excellence at every level, behaving ethically and professionally, continually striving for improvement

- **Innovation**

We lead the way in delivering innovative and integrated solutions, pushing the boundaries of science and technology in the nuclear defence environment

- **Trust**

We build trust in all that we do, meeting our promises and commitments to each other, our neighbours, our customers and our country.

As we continuously improve our business practices, we must hold firm to our high standards of ethical conduct. Our values and ethics are fundamental to who we are and what we do.

Our success relies on our relationships with

customers, shareholders, external regulators and suppliers. These groups, along with other organisations and individuals we interact with, take a close interest in what we do. A key determinant of our reputation is how we all behave – both collectively and as individuals.

Our AWE Code of Ethics offers clear standards and guidance for when you are representing AWE or act on behalf of the company. Each AWE employee is individually accountable for upholding the high standards outlined in the Code of Ethics. We expect the same standard of ethical conduct from any of our suppliers or integrated personnel working on behalf of AWE. In addition to this guidance, I encourage you to consult other resources, including your Line Manager, AWE's Corporate Ethics Office or HR Business Partner, should an ethics-related issue or question arise.

Thank you for embracing our Code of Ethics and core values, and for committing to the high standards for ethics that is essential to AWE's success.

Kevin M. Bilger



Our Commitment

We take great **pride** in working together to help keep our world safe and secure by delivering warheads for the UK's deterrent. We deliver **excellence** at every level and continually strive for **innovation** as we push the boundaries of science, engineering and technology in the UK's nuclear weapons programme.

Most importantly, we build **trust** in all we do by behaving ethically and professionally in meeting our promises and commitments.

Building on our proud heritage, our excellent people and technologies, we will continue to be a unique and internationally recognised trusted partner to the UK Government, delivering innovative and integrated nuclear security solutions.

We are committed to working ethically.



Our Code

This Code of Ethics promotes honest and ethical conduct by setting out the high standards required by AWE and explaining what must be done to meet those expectations.

This Code outlines the principles governing how we all at AWE conduct our business. The booklet also sets out AWE's responsibilities

to its stakeholders and describes how we expect colleagues to behave regarding both our company values and the relevant legislation and regulation controlling the operation of our sites.

Other company policies and relevant UK legislation should be read alongside this Code.

case study

Ethical dilemma: Social media abuse

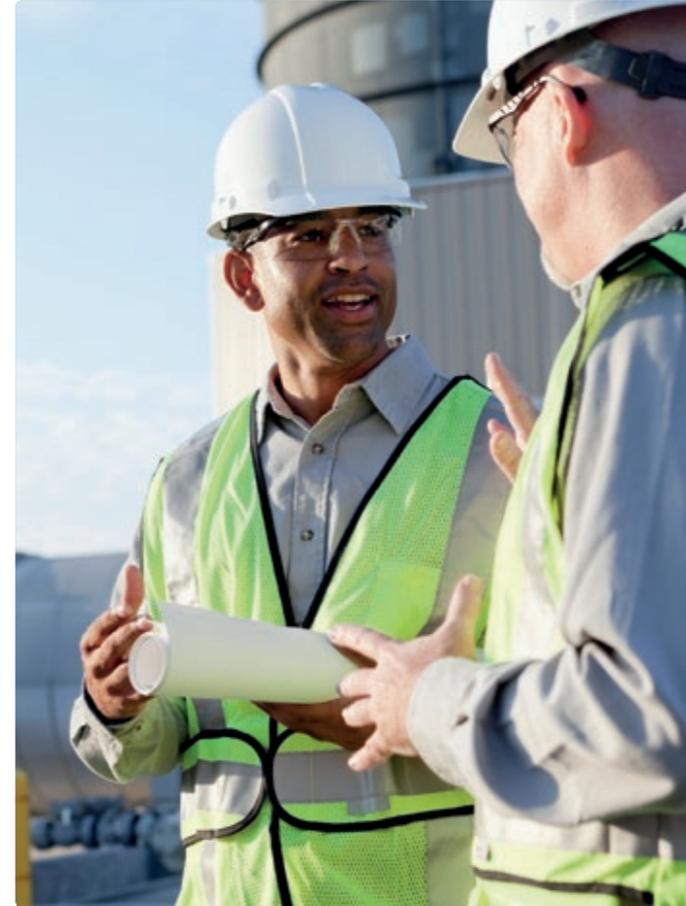
Your colleague Andrew posts some negative comments on Facebook about a decision his manager has made which he does not agree with. It is about a security issue and Andrew is obviously frustrated and angry about it, making remarks that are increasingly disparaging about his manager and AWE.

What would you do?

- 1 Nothing – it does not concern you
- 2 Talk to Andrew – if he has a problem he should deal with it internally
- 3 Report it to your manager

The third option is the correct one – Andrew is saying negative things about the company publically and this is not appropriate. You can talk to him, too, but you still need to report it.

Misuse of social media is a serious issue that must be dealt with.



Our Conduct

AWE's continued success depends on us maintaining the public's trust and preserving our reputation in the eyes of those we deal with, including colleagues,

customers, parent companies and the wider community.

Behaving ethically is at the heart of what we do.

1 Commitment to colleagues

Effective employment policies are in place to ensure we recruit and retain the best people.

AWE respects the human rights of all colleagues and will treat everyone fairly, responsibly and with dignity.

We commit to continue encouraging diversity by selecting

and developing employees on their ability and qualification for each job.

No harassment, bullying nor violence against any colleague will be tolerated and we also commit to being safe, secure and clean on all our sites.

case study

Ethical dilemma: Bullying

Emma was constantly undermining Ben and talking negatively about him, both behind his back and to his face. You notice the effect this is having on him – he looks pale and drawn and last week his presentation was not very good as he seemed really nervous. Ben also tells you that he is miserable, not sleeping and has lost confidence.

What would you do?

- 1 Nothing – it is none of your business
- 2 Talk to Ben and suggest he confronts Emma
- 3 Speak to Ben's manager, once you have made sure he knows you are going to do so

You should take the third option and talk to Ben's manager because if you see something is wrong you need to act. Ben would likely find it hard to confront Emma and his manager must deal with a situation like this – bullying is not acceptable.

2 Colleague responsibilities

All those working on our sites are expected to behave ethically at all times. Everyone should work with honesty and in a professional manner to promote our good public image and reputation.

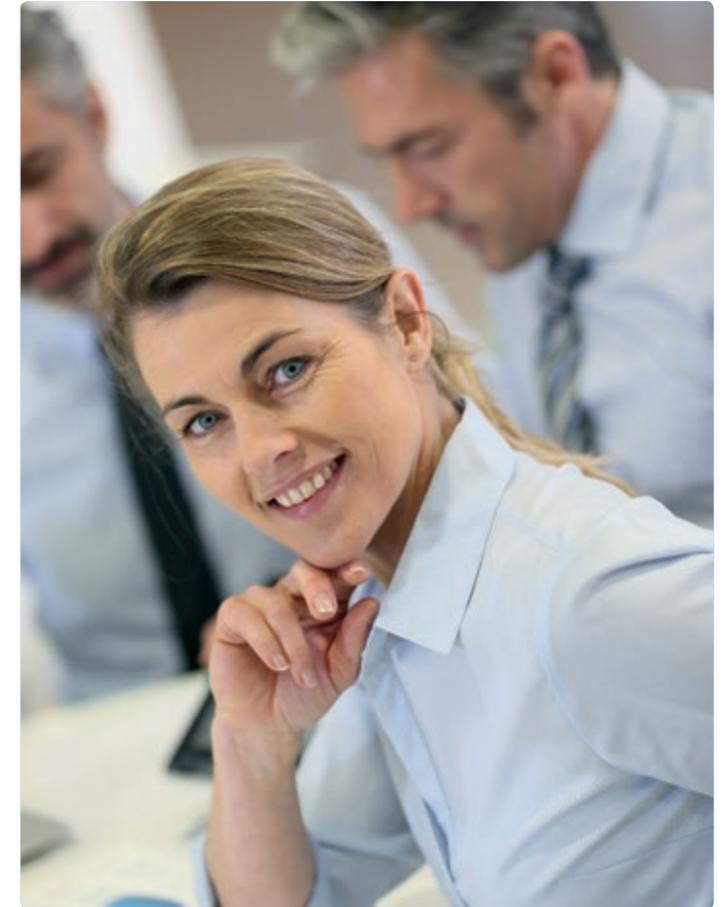
Colleagues should be intolerant of discrimination, harassment or victimisation and must report any instances witnessed.

The creation, sharing and use of science, engineering and technology are fundamental to our strategic mission, improving our capabilities and managing knowledge and information.

Our reputation for world-class science, engineering and technology underpins our ability to deliver the UK's requirements for nuclear warheads and supports national security.

Colleagues should work with honesty and act with great care, keeping skills updated.

We must always work in a principled way with our stakeholders.



3 Community relationships

Our business success depends on building a strong and positive relationship with the local community and stakeholders and being seen as a responsible neighbour. We must commit to engaging in open and transparent communications in our dealings with them. AWE also encourages colleagues to become actively involved in community initiatives.

We are committed to promoting efficient and effective communications with the media and general public about our activities. Our AWE Communications Team should be the first point of contact in any dealings with the media and can be contacted on [0118 985 5888](tel:01189855888).

4 Customer/stakeholder relationships

Key stakeholders influence our programme of work and ultimately impact on the sustainability of our business. The successful management of our stakeholder relationships is a high priority. It remains a vital part of our commitment to optimising stakeholder value.

We have developed a structured framework for managing customer and stakeholder relations. In all interactions, those working on its sites should ensure AWE's reputation is protected and enhanced by communicating in an honest, transparent, accurate and timely manner.



5 Supplier relationships

Individuals buying goods or services for AWE or those involved in the procurement process must treat all suppliers consistently and fairly. In deciding among competing suppliers, colleagues should objectively and impartially weigh up all facts and avoid any favouritism.

Because of this, those working on AWE sites must not accept gifts or hospitality from suppliers or vendors, except advertising or promotions of a nominal value.

No gift or hospitality can exceed £50 per item (see below for guidance).

6 Gifts and hospitality

These include anything with a monetary value, like the following:

- Goods or services
- Hospitality and entertainment such as meals, tickets to events
- Discounts
- Gratuities
- Loans
- Personal favours

We are aware it is common practice for entertainment, hospitality and gifts to be given and received during the normal course of business. But it is important gifts and hospitality should be of nominal value and not exceed £50 per item.

● continued on page 10

case study

Ethical dilemma: Accepting gifts

Project manager Hannah receives a huge Harrods hamper worth several hundred pounds from one of her suppliers, whose contract is just about to end.

They are hoping to renew it soon.

Hannah is delighted with the gift and puts it straight in her car.

What should you do?

- 1 Say nothing and hope you are going to get a hamper too
- 2 You remind Hannah to put it on the gifts and hospitality register
- 3 You challenge her decision to accept the gift and if she refuses to discuss it, talk to your manager

You must act if you suspect something is wrong and record it, as AWE has a £50 limit on gifts it must be declined. As it is such a large gift, it could influence the prospects of the supplier in the future job bid and it must be refused.

6 Gifts and hospitality (continued from page 9)

Those working on AWE sites should not seek to accept anything that might reasonably be believed to influence commercial activity or their decision-making process.

Invitations to corporate hospitality or entertainment events may be accepted subject to certain considerations like:

- **The level of hospitality offered**
- **The way in which it is being provided**
- **The level of influence the person receiving the invitation has on business decisions**
- **The frequency of such invitations**

Prior approval to attend the event or accept the hospitality must be obtained from your line manager. Offers of anything must be recorded in hospitality registers, whether they are accepted or declined. The hospitality capture tool can be found on the portal.

Any suppliers holding corporate events with the intention of inviting those working on AWE sites must inform Supply Chain Management before the event. This email address is scm.relmanagement@awe.co.uk



7 Anti-bribery and anti-corruption

We have a zero tolerance approach to bribery and corruption and commit to acting professionally, fairly and with integrity in all our business dealings and relationships.

We will implement and enforce effective systems to counter bribery wherever we operate.

AWE upholds all laws relevant to countering bribery and corruption.

8 Fraud prevention

AWE will also not tolerate fraud and is committed to ensuring all its resources are used for the purpose for which they are intended.

The Fraud Act 2006 states this offence can be committed in three ways – by false representation; failing to disclose information; and abuse of position. We commit to uphold all laws relevant to countering fraud and remain bound by the laws of the UK.

Fraud is used to describe acts such as criminal deception, blackmail, corruption, theft, embezzlement, forgery, concealment of material facts and collusion.

● see chart on page 12

case study

Ethical dilemma: Fraud

Newly-promoted lead accountant Jane meets with her boss to go through the company finances. While discussing the figures, he mentions her predecessor used to go with them to Wimbledon each summer as a thank-you for all his hard work. When Jane reviews the figures following the trip, which she enjoys, there are suspect cash transactions, which she calls her boss to clarify. He says smoothing over any anomalies was part of the understanding with her predecessor, adding that tickets for Centre Court don't come cheap.

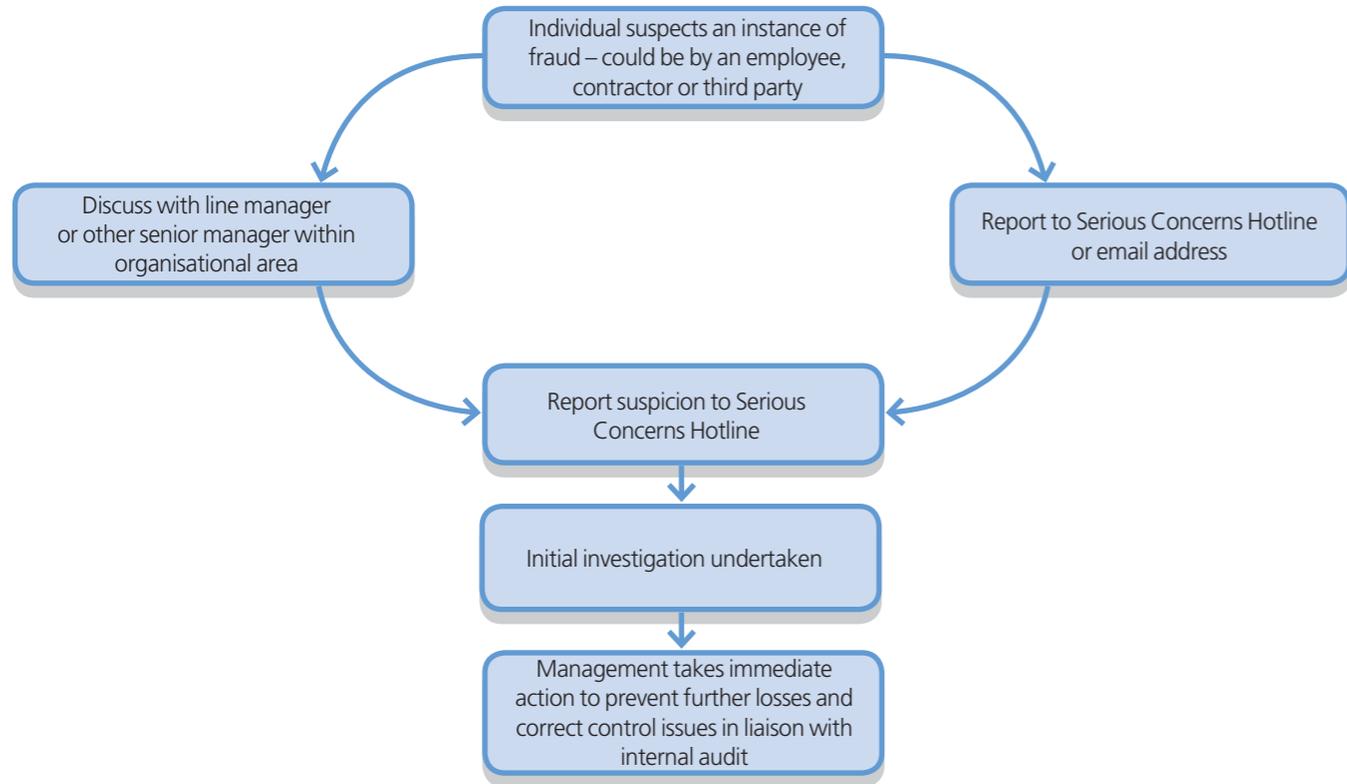
What would you do?

- 1 Report it to a member of the board or the Corporate Ethics Manager
- 2 Tell your boss you are not prepared to be compromised
- 3 Find a way of balancing the figures

Any suspected fraud must be reported to someone who can look into it and deal with the matter, so the first option is the right answer. Jane must flag up this serious issue with someone in authority.

8 Fraud prevention (continued from page 11)

This chart details the course of action to be taken:



Safeguarding

This Code of Ethics applies to all colleagues, contractors, agents and others when representing AWE. Compliance is monitored and reviewed by our Corporate Ethics Manager.

AWE monitors ethical performance regularly and produces reports to the Audit Committee. This booklet is

reviewed to ensure it reflects our company values and concerns of those working on its sites.

This Code is intended to be a guide and further information can be found on our website – www.awe.co.uk – and on the company portal, through our ethics portal page.

Seeking advice and guidance

To protect ourselves and AWE, we should all be aware of what unethical behaviour is, the steps we can take to avoid it and available help.

Our Executive Leadership Team is committed to ensuring anyone raising a concern will not risk losing their job or suffer any

retribution as a result of highlighting a problem.

This Code cannot cover every situation that may arise and individuals could be faced with ethical issues that are difficult and complex to resolve.

● continued on page 14

case study

Ethical dilemma: Conflict of interest

Gary has shortlisted three suppliers to come and pitch for a large contract. When the second supplier arrives, he recognises an old friend, Wendy, who is heading up the team.

Later, when he analyses the results he sees that Wendy's bid is the best.

What should he do?

- 1 Gary should give Wendy the contract because it is irrelevant that she is an old friend
- 2 Gary should talk to his manager and consider his role in the decision-making process
- 3 He should not give her the contract as it compromises his integrity

The second option is right because there is a conflict of interest and, even if Wendy's bid is best, Gary could be seen to be influenced by the old friendship. It risks the tender being seen as unfair by colleagues and other suppliers.

Seeking advice and guidance (continued from page 13)

If you are unsure whether an action or decision would comply with our business principles, consider the following:

- **Is the proposed action or decision legal?**
- **Are you authorised to take the action or decision?**
- **Is it consistent with AWE's values and our Code of Ethics?**

If you have any doubt over the legality or ethics of an issue, seek further advice before continuing. Approach your line manager or supervisor or speak to the Corporate Ethics Manager about a particular issue or any concern.

Colleagues can call the EXPOLINK line on 0800 374 199, open 24 hours a day.

You can ring in total confidence knowing your call will not be traced or recorded. Information given to EXPOLINK is passed on to a senior executive without compromising the caller – you won't even be asked your name.

There is also an internal telephone line if you prefer. It is manned

during working hours and provides a telephone answering service outside normal hours. The number for this helpline is [extension 25758](#) internally or [01 189 825758](#) externally.

AWE also has a mailbox, which can be accessed internally and externally, where email messages

can be left, although they will not be anonymous. This address is seriousconcerns@awe.co.uk

Any allegation is investigated promptly, thoroughly and objectively, within reasonable time limits. Upon request, feedback will be given in writing to the employee raising the concern.

Relevant legislation and policies

This Code should be read in conjunction with related policies:

- [Business Ethics policy](#) ● [Concerns policy](#) ● [Supply Chain Management policy](#)
- [Anti-corruption and Anti-bribery policy](#) ● [Fraud Response plan](#) ● [Employee Handbook](#)

These are available on the ethics pages on the portal.

This Code should also be read bearing in mind UK legislation that includes:

- [Public Interest Disclosure Act](#) ● [Data Protection Act](#) ● [Fraud Act 2006](#)
- [Equality Act 2010](#) ● [Bribery Act 2010](#)

If in doubt... seek help

Ask yourself...

Is this something to be proud of?
Is this **fair** and **honest**?

Have we covered all the risks?

How do I **honestly** feel about this?

Is this **bothering** me in any way?

How would this look to our **customer** or **supplier**?

Do I need to find out more about this?

Will this **decision** stand the test of time?

Are these **actions** legal?

Think and behave ethically

Work with integrity

Respect others

Build trust

Take pride in your work

Always do the right thing...