



STRATEGIC  
STORAGE  
PARTNERS

An APTIM BWXT JV

# Code of Business Ethics and Conduct

## From The President and Project Manager

At Strategic Storage Partners (SSP), integrity isn't just a value—it's how we operate. Every action we take should reflect our commitment to doing the right thing. Our co-workers, our community, and our customer count on us to deliver on our important responsibilities working at the Strategic Petroleum Reserve—and that means doing our jobs with integrity, every step of the way.

Our Code of Business Ethics and Conduct lays out what acting with integrity looks like at SSP. The Code also points you to the resources available if you ever need guidance.

As you go through the Code, think about how it connects to your day-to-day work. If something's unclear or you have a concern, talk to your manager, or reach out to Human Resources, Ethics & Compliance, or Legal. You can also contact our APTIM Ethics Line, available 24/7, using our on-line portal <https://aptim.caseiq.app/portal> or by calling 1.866.921.6714, where you can stay anonymous if you prefer.

We believe in creating a workplace where ethical behavior is the norm and where speaking up is encouraged and protected. If you see something that doesn't feel right, we want you to say something. Whether it's a question, a concern, or a report, your voice matters.

I'm proud to be part of the SSP team and proud of the work we're doing to support this critical resource for the energy security of the United States. I'm personally committed to living out our value of integrity, and I hope you'll join me in doing the same—by following the Code and making choices that reflect well on SSP and on you.

Alan Weakley  
President and Project Manager  
Strategic Storage Partners, LLC

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## 1.0 INTRODUCTION

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The Strategic Storage Partners, LLC (“SSP” or “Company”) Code of Business Ethics and Conduct (“Code”) provides the ethical guidelines and expectations for conducting business on behalf of SSP. The Code includes a summary of certain key Company policies to assist employees in complying with these guidelines and the law.

The Code also describes our standard of higher ethical conduct, reinforces our commitment to integrity, and sets expectations of behavior for employees on the job.

The Code applies to all directors, officers, and employees (full-time, part-time, and temporary) of the Company. SSP expects you to act with honesty and integrity in all matters when representing our Company. SSP expects 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.

Certain external business partners of SSP serve as an extension of the Company. We expect our external business partners, such as suppliers, vendors, subcontractors, agents, representatives, consultants, and joint venture partners, to behave in the ethical manner described in our Code when doing work for the Company. Managers, who administer the performance of our external business partners, are responsible for ensuring that they understand their compliance obligations. If an external business partner fails to comply with our ethics and compliance policies, it may result in the termination of its subcontract with SSP.

While the Code cannot address every law, policy, or issue that we may encounter, it does provide guidance and resources for those times when the right choice may not be clear. The Code is not a substitute for exercising common sense and good judgment or seeking guidance when needed.

### 1.1 Compliance with Laws and Regulations

The laws and regulations of the United States, its states, and municipalities apply to SSP. SSP policy is to comply with all laws and applicable regulations, everywhere we engage in business.

Each of us should be aware of the relevant laws and regulations that apply to our work and any changes, or new laws or requirements that may affect our business. We each need to know the rules so that we never, intentionally or unintentionally, engage in conduct that violates applicable standards.

### 1.2 Taking Action When You Have Questions—Reporting Possible Violations

Every time you ask a question or raise a concern, SSP has an opportunity to improve. When you speak up to clarify a policy or report questionable conduct in the workplace, you are protecting your colleagues, our stakeholders, and the Company.

If you believe that anyone associated with SSP has violated a provision of our Code or policies, bring the matter to the attention of your supervisor or manager, Ethics & Compliance, Legal, your Human Resources representative, or contact the APTIM Ethics Line using our on-line portal at <https://aptim.caseiq.app/portal> or by calling **1.866.921.6714**. We will maintain confidentiality for those who report concerns to the greatest extent possible, consistent with a fair and full investigation.

### **1.3 Duty to Cooperate In Investigations**

SSP expects every employee to cooperate in lawful investigations of allegations that our Code, policies, or laws have not been followed. Cooperation means being honest, truthful, and forthcoming in response to questions and requests. Cooperation also means protecting confidentiality during the investigation, so that the investigation can be conducted fairly and efficiently. If you do not cooperate, you could face discipline, up to and including termination of employment.

The Company cooperates with lawful government investigations. When we are notified of an external investigation, we will take prompt action to preserve documents that may be relevant.

**You must never destroy or alter any documents or electronic records, lie to, or mislead an investigator, or obstruct the collection of information that relates to an investigation, audit, or any legal action related to SSP.**

### **1.4 Mandatory Disclosure**

SSP expects all employees to promptly raise concerns so that the Company can determine whether a mandatory disclosure is required. You should report any situation that you believe may be a violation of laws or regulations prohibiting bribery, conflicts of interest, fraud, gratuities, false claims, or situations in which we may have received overpayment for our work. Timely reporting allows us to assess the issue, meet contractual and regulatory obligations, and take appropriate action when necessary.

### **1.5 Resources for Questions and Reporting**

SSP expects you to speak up and report any unethical business conduct and any violation of the Code or of Company policy. Remember, SSP can only address issues that are brought to our attention—we can only act if you inform a responsible person or the APTIM Ethics Line.

SSP has an open-door policy. Talk to your supervisor or manager about concerns or questions at any time. SSP provides other options for reporting, including talking directly to another leader, talking directly to Human Resources, Ethics & Compliance, Legal, or reporting a concern to the APTIM Ethics Line, anytime. You can make your call or report to the APTIM Ethics Line anonymously if you wish, which means you do not have to give your name.

## 1.6 What to Expect When You Call the APTIM Ethics Line

One of the best ways that we can be for each other is to ask questions, think critically, and report activity that jeopardizes the integrity of SSP. We will always support every employee when they choose to do right thing. No hesitation or exceptions.

The APTIM Ethics Line is available 24 hours a day, seven days a week. The call will be answered by a professional, independent third party. The interviewer will listen and document the situation in detail. Your call will not be recorded, and you do not have to provide your name, although this may make it more difficult to investigate and resolve your concern. The information will then be relayed to SSP for investigation. Confidentiality for those who report concerns will be maintained to the fullest extent possible.

## 1.7 Integrity in Everything We Do

The Code, policies, and procedures offer important guidance for our daily conduct at work, but these alone cannot create a company-wide culture of integrity. We each help to shape our culture through our personal commitment to meet the highest ethical standards in all 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. If you are faced with a difficult decision, ask yourself the following questions:

- Will my actions comply with the intent and purposes of SSP's policies, procedures, and the Code?
- Is it the right thing to do?
- Have I considered all the options, and do I have all the facts?
- Will my actions be lawful?
- Will I be comfortable telling others about my decision?
- Can I honestly say I would be proud of the choice I made, or would I instead be embarrassed of my actions?
- What is the possible impact of my actions on others?
- What would I say if someone else made the same choice?
- How will my decision be viewed in one month; one year later?

Seek guidance if you are still unsure what to do. Don't hesitate to ask questions and get the advice you need. Keep asking questions until you have the information you need to make the right choice.

## **1.8 Protection from Retaliation**

SSP will not tolerate any retaliation or retribution against anyone who makes a good faith report of an alleged violation of the Code or policies. Individuals who raise good faith concerns, who participate in investigations, and who help to resolve reported matters are protected against retaliation.

We take claims of retaliation seriously, which means that we thoroughly investigate any claim of retaliation and, if substantiated, we will discipline retaliators, up to, and including termination of employment. If you believe you have been retaliated against, report your concerns to your supervisor, Human Resources, Ethics & Compliance, Legal, or the APTIM Ethics Line.

## **1.9 Accountability and Discipline**

Violating relevant laws, regulations, or this Code, or encouraging others to do so, exposes the Company to liability and puts SSP's reputation at risk. Violations may result in disciplinary actions up to and including termination of employment.

Understand that violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution. The Company takes a zero-tolerance position on these violations.

If you direct or approve of any conduct in violation of this Code, Company policies or procedures, or law, or if you know about misconduct and do not report it, you could be subject to disciplinary action.

## 2.0 OUR RESPONSIBILITIES TO ONE ANOTHER

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Each of us has a responsibility to do our part to promote and maintain the highest ethical standards. In particular:

- Do the right thing. Period.
- Be familiar with the information contained in this Code and Company policies, paying particular attention to the policies that pertain to your job responsibilities.
- Promptly report concerns about possible violations of laws, regulations, policies, or this Code to your supervisor, any member of management, Legal or to the APTIM Ethics Line.
- Complete all required compliance training in a timely manner and keep up to date on current standards and expectations.
- Cooperate with investigations, auditing, and monitoring procedures.
- Tell the truth. Do not make false or misleading statements.

There is no good excuse for violating laws, regulations, or policies. We will support any employee who chooses to do the right thing.

### 2.1 Ethical Leadership

Management has the added responsibility of demonstrating, through their actions, the importance of high ethical standards. SSP expects leaders to meet the following additional expectations:

- Help create a work environment that recognizes effort, appreciates teamwork, and values mutual respect and open communication.
- Never ask an employee to do what you would be prohibited from doing yourself.
- Be a resource for employees. Communicate to employees about how the Code, policies, and procedures applies to their daily work.
- Serve as a role model for the highest ethical standards and work to create and sustain a culture that demonstrates care and concern for your colleagues.
- Be proactive. Take reasonable actions to prevent and identify misconduct and report situations that might impact the ability of employees to act ethically on behalf of the Company.
- Take prompt action to correct business conduct that is inconsistent with the Code or policies.
- Seek assistance from other supervisors whenever you are unsure of the best response to any given situation.

- If you supervise external business partners including suppliers, vendors, contractors, agents, representatives, consultants, and joint venture partners, ensure that they understand and meet their compliance obligations.

Managers and supervisors, if an employee raises an ethics concern, welcome the chance for a dialogue, even if you do not agree that there is a problem. We want ethics dialogues to be a natural part of daily work, not a challenge to authority. As a manager or supervisor, you are responsible to ensure that the employees under your supervision act ethically. Failure to exercise this responsibility through training, communication, and taking disciplinary action when required, may subject you to disciplinary action as well.

## **2.2 Fair Employment Practices**

SSP employees are committed to respect and to “being for each other,” supporting each other’s success and operating from the point of view that we are all in this together and that any one of us cannot win at the expense of someone else. Our culture is to collaborate, to care, and to honor our commitments. Harassment, intimidation, discrimination, and retaliation are contrary to these important values. We expect our employees to treat each other with respect. We are all responsible for doing our part to create a positive working environment.

SSP is committed to attracting, developing, enabling, and appreciating talent. We believe that our different backgrounds, experiences, and perspectives give our company the strength we need to lead in our marketplace. SSP values all employees as individuals for who they are and expects employees to do the same. SSP enhances teamwork and builds a competitive advantage by respecting differences.

SSP strives to ensure equal opportunity for all applicants and employees during all phases of employment. SSP is committed to providing a work environment that is respectful and free of harassment, intimidation, and retaliation. SSP prohibits sexual harassment and harassment against applicants and employees based on any legally protected status, including age, citizenship, color, disability (physical or mental), gender, gender identity, familial or marital status, national origin, race, religious creed or religion, sexual orientation, veteran or military status, genetic information, or any other legally protected status.

SSP prohibits any form of harassment (any action that creates or seeks to create a hostile, intimidating, or offensive work environment). Harassing behavior can be sexual or non-sexual, but, in any case, harassment has no place at SSP. Harassment can include verbal remarks (comments, suggestions, jokes, requests for sexual favors), pictures (videos, drawings, or photographs), or physical behavior (unwelcomed touching, suggestive looks). In any form, harassment violates our Code and policy. If you feel that you or someone else is being harassed or discriminated against, report your concerns to your supervisor, Human Resources, Ethics & Compliance, Legal, or the APTIM Ethics Line.

## **2.3 Abuse of Drugs and Alcohol**

SSP is committed to providing a safe and productive work environment, which is free from the use of illegal drugs, the misuse of legal drugs, and the abuse of alcohol.

When you report to work, SSP expects you to be fit for duty and capable of performing your assigned responsibilities safely and productively, free from the influence of illegal drugs or alcohol.

SSP does not tolerate the use of illegal drugs or alcohol in the workplace. Anyone who is under the influence of illegal drugs or alcohol while conducting business for SSP, could create an unsafe work environment and may be subject to discipline. SSP reserves the right to test for the use of alcohol or other controlled substances and may conduct searches in the workplace if there is reason to suspect violation of policy, where consistent with applicable law.

- While at work or on Company business, be alert, never impaired, and always ready to carry out your work duties.
- Possession of legally prescribed drugs is not prohibited, but you are responsible to ensure that while in the workplace the use of prescribed drugs will not affect your productivity or the safety of the workplace. Consult with Human Resources or Safety if you have questions.
- Follow local laws and customs when they are more restrictive than Company policy.
- Do not bring alcohol into the workplace.
- Resources are available to you if you have a problem with substance abuse. SSP expects you to seek professional help as needed. Contact your Human Resources representative to obtain information on how to access the Employee Assistance Program (EAP).

## **2.4 Health and Safety**

SSP strives to provide a safe, secure, injury-free, and healthy work environment. We believe that all occupational and environmental incidents can be prevented, and we have an established safety program to help us achieve our environmental, safety and health goals.

An integral part of our safety program is our Safety Conscious Work Environment (SCWE) expectation; we encourage an open culture for all employees to raise issues that are important to them and allow for resolution with commitment, respect, and timeliness. SSP expects you to report immediately any situations that may pose an environmental, safety, health, and quality (ESH&Q), or security hazard.

Each of us has a responsibility to help maintain safe working conditions for ourselves, our co-workers, and visitors to our facilities. We must all participate in safety training, follow safety standards, and report any safety concerns, accidents, injuries, and unsafe conditions. We all need to work together to foster a positive working environment, to practice and promote proper work habits, use good judgment, and comply with all applicable ESH&Q rules and regulations.

We can only achieve our goal of a safe, secure, and healthy work environment through everyone's active participation and support. SSP empowers and expects all employees, contractors, customers, and vendors to follow SSP's ESH&Q policies and procedures. It is your responsibility to:

- Always wear required safety equipment.
- Never tamper with safety equipment or systems.

- Create and maintain a work environment that encourages open communication. The more we communicate, the better we can respond to any unsafe or non-compliant situations.
- Make sure you are familiar with the laws, regulations, policies, and procedures that apply to your job.
- Notify your supervisor or site safety employees immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment. All employees have the right and responsibility to stop any work they feel may be unsafe.
- Cooperate in all investigations to determine the cause of incidents.

At SSP we do not tolerate:

- Threatening remarks.
- Causing physical injury to another.
- Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- Unauthorized possession of firearms, weapons, or explosives on Company property or while on duty.
- Threatening, intimidating, or coercing fellow employees on or off the premises (including on social media)—at any time, for any purpose.

For further information, requirements for the creation and maintenance of a safe work environment are detailed in the ESH&Q procedure manuals developed by each operating group or division.

## 3.0 OUR RESPONSIBILITIES TO OUR CUSTOMERS AND BUSINESS PARTNERS

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### 3.1 Dealings with the Government Customer

The laws, rules, and regulations for contracting with the U.S. Government are detailed and complex. Violating these legal provisions may result in criminal penalties as well as disciplinary action, including dismissal. If you deal with the U.S. Department of Energy (DOE) in support of SSP's performance of the Contract, you must familiarize yourself with and comply with the various limits and requirements imposed by law, regulation, and the Contract. Take special care to ensure accuracy in all communications with DOE. False, inaccurate, or misleading communications are criminal violations of law.

### 3.2 Time Charging

We must only charge DOE for time spent on work authorized by our DOE contract. Timecard 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. It is also illegal for a person to knowingly make a false record or statement material to the payment of a false or fraudulent claim. Additionally, civil penalties of \$10,000 and greater per occurrence exist under the False Claims Act for falsification.

**We must, without exception, always timely, properly, accurately, and precisely report our time.**

The SSP 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 for complying fully with SSP time recording procedures including:

- Accurately record time worked daily at the end of the day or in the morning for the previous day.
- Properly code time to the contract cost account (i.e., projects/activities worked).
- Reporting knowledge of falsified time sheets.

Employees and subcontractors, you are responsible for the information submitted on your timecard. When you submit or approve information in the time-keeping system, you affirm that the time and attendance data are true, accurate, and complete. When you submit time and attendance data, you acknowledge awareness and understanding of your responsibilities under applicable requirements. If

someone else submits a timecard for you, you are still responsible to review the timecard and make corrections if needed.

Managers and approval delegates, when you approve or concur with a submittal in the time-keeping system, you represent, to the best of your knowledge and belief, that the time and attendance data submitted are true, accurate, and complete. When approving time and attendance data, you are acknowledging awareness and understanding of your responsibilities under applicable requirements.

If you're responsible for approving time, you must have reasonable knowledge of the work performed by the employees and subcontractors on the associated tasks that you're approving. Various techniques are available to obtain reasonable assurance including, for example, reviewing the employee's or 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. Periodic reviews are conducted to ensure recording of labor hours in accordance with applicable requirements.

If someone encourages you to charge time in a manner contrary to these rules, it is your responsibility to report the matter to your supervisor, Human Resources, Ethics & Compliance, Legal, or the APTIM Ethics Line.

### **3.3 Quality of Products and Services**

SSP is committed to providing the DOE with the right products and services, safely, the first time, and within budget. Honesty, integrity, and ethical business practices are a critical part of the way we conduct ourselves—we earn our client's trust and respect. To meet these goals, it's important that we identify all requirements before work starts and that we communicate them to all concerned.

We also hold our external business partners accountable for complying with our high standards of quality.

SSP and its business partners are committed to:

- Understanding our customers' needs and meeting their requirements.
- Addressing and reporting any quality issues and concerns.
- Ensuring that management remains responsible and accountable for showing its commitment to quality and for providing the necessary resources to meet the agreed requirements.
- Ensuring that first line supervisors are responsible and accountable for the work performed by their direct reports and ensuring that quality requirements are made known and followed.

- Always completing reports and documentation fully and honestly and never falsifying or misrepresenting test results.
- Never performing tasks for which we are not qualified.

If at any time you are not sure what the production requirements are, ask your manager or supervisor for clarification before continuing the work.

### **3.4 Integrity in Business Relationships**

We will only do business with third parties that conduct business ethically and do not subject the Company to criminal or other liability or cause SSP reputational harm.

All third parties must agree to comply with business practices reflected in our Code and applicable policies. Conducting due diligence minimizes SSP’s risk by helping to avoid relationships that may implicate SSP through the misconduct of its business partners. Accordingly, we always conduct due diligence on third parties to ensure that their reputation, background, and abilities are appropriate and meet our ethical standards.

Only certain SSP officers and authorized procurement representatives can bind SSP to contractual relationships. In exercising this authority:

- No employee shall contractually bind SSP to another party until such party has been through the appropriate due diligence and approval procedures.
- Do not conduct business with a supplier, business partner, or other third party that may subject SSP to criminal or other liability or cause reputational harm.
- Be cautious of any suspicious activity involving the conduct of the Company’s sales representatives or agents.
- Strictly follow Company policies and procedures in dealings with third parties.
- If you are a manager, ensure that the Company’s standards and expectations are understood and agreed to prior to entering any contractual relationship.
- Never do anything through another party acting on our behalf that we are not allowed to do ourselves.
- Ensure that any commission or fees paid to a third party are reasonable and consistent with sound ethical principles and applicable laws.

When engaging in procurement activities:

- Create and maintain all records accurately to document the procurement process and to substantiate procurement decisions.

- Use merit and the terms of the solicitation alone as the standards for procurement decisions. Be careful to avoid conflicts of interest between the Company and any third parties.
- Do not divulge procurement information to anyone outside the Company or to persons inside the Company who do not have a “need to know.”

If you become aware of any unethical business conduct by a SSP supplier or provider of services, contact your supervisor, Human Resources, Ethics & Compliance, Legal or the APTIM Ethics Line.

### **3.5 Identifying and Reporting Material Noncompliance**

As a government contractor, SSP owes a duty to its customer to identify and report any material non-compliance with SSP’s contractual obligations. If you cause or uncover suspected material non-compliance with SSP’s contractual obligations, you are required to report this information to your supervisor, Human Resources, Ethics & Compliance, Legal or the APTIM Ethics Line. SSP will timely investigate the issue where necessary, in consultation with the Legal Department, and report it to the government.

### **3.6 Conflicts of Interest**

A conflict of interest occurs when your actions or your private interests interfere in any way—or even appear to interfere—with the interests of the Company. Conflicts of interest expose our personal judgment and that of SSP to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us.

We have a fundamental obligation to make sound business decisions in the best interests of the Company, independent of our personal interests. We must not take personal advantage of opportunities for SSP that are discovered because of our position with SSP or use of Company property or information. In addition, we must not use our position with SSP or Company property or information for personal gain to compete with SSP.

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

For purposes of this section of this Code, household and family members include the employee and the employee’s spouse, significant others, dating partners, children, stepchildren, parents, parents-in-law, siblings, siblings-in-law, children-in-law, roommates, cousins, aunts, uncles, or any other relationship that could lend itself to an actual, potential of 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 instances 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.
- Engage in intimate or romantic relationship with a direct or indirect report or supervisor.

All employees, subcontractors, consultants and other third parties have a continuing duty to disclose any conflicts of interest to Ethics & Compliance, Legal, or the APTIM Ethics Line as soon as facts or circumstances arise which could create an actual or perceived conflict of interest. Failure to disclose a conflict, whether actual, potential, or perceived, may be determined to be misconduct, subjecting the individual to disciplinary action.

Because it is impossible to describe every potential conflict, each of us must exercise sound judgment, seek advice when necessary and adhere to the highest standards of ethics and integrity.

**Avoid being compromised and avoid even the appearance of conflicts of interest.**

If you become aware of an actual, potential, or perceived conflict of interest, immediately disclose the situation to Ethics & Compliance, Legal, or the APTIM Ethics Line. In addition, keep in mind the following:

- Avoid being compromised and avoid even the appearance of conflicts of interest.
- When in doubt, disclose.
- Always make business decisions in the best interest of SSP.
- Remain aware of how personal activities can lead to potential conflicts, such as accepting gifts or entertainment from a supplier.
- Never use your position at SSP, Company property, or information you have gained through your work for personal gain.

### **3.7 Conflicts of Interest—Warning Signs**

Both the appearance of a conflict and an actual conflict are cause for concern. All employees, as well as anyone acting on behalf of the Company, must make business decisions based only on the best interest of SSP.

- Avoid situations where you might be involved in hiring or supervising any close relative.
- SSP may only hire relatives of current employees if the new employee will not be working directly for or supervising a relative or will not occupy a position with authority to affect decisions involving any direct benefit to the relative.
- Don't allow your personal relationships with contractors and suppliers to inappropriately influence business decisions.
- Don't give or accept gifts or hospitality without prior approval that might place you under an obligation—or might appear to do so.

### **3.8 Gifts, Gratuities, and Entertainment**

Strong relationships with our business partners are vital to our business, but giving gifts to and receiving them from business partners or customers can potentially affect the independence of our judgment and that of our customers and may create the appearance of favoritism.

For the purposes of our Code and policies, the term “Gifts and Entertainment” has the broadest possible meaning, including gifts and favors of all kinds, trips, services, meals, tickets to events, and any other gratuitous item, benefit, or thing of value.

You must avoid even the perception that giving or receiving gifts or entertainment is connected in any way with favorable treatment. Even if there is no intent to gain inappropriate influence or advantage, inappropriate gifts may cause embarrassment to the Company and damage our reputation.

For these reasons, employees must not receive, solicit, offer, or give inappropriate gifts or entertainment that may influence, or be perceived to influence, the recipient's integrity or independence.

Because there are special rules and restrictions regarding U.S. government employees and non-U.S. government officials, SSP does not give or accept gifts from or to any client representatives (including our client or any subcontractors). SSP expects its employees not to give or receive anything of value from or to a government representative. If you have questions, consult Ethics & Compliance or Legal.

We recognize there will be times when a current or potential business associate may extend an invitation to attend a social event or participate in trips to further develop your business relationship. As

a rule, decline such offers unless approved in advance by Ethics & Compliance and Legal, and when all the following criteria are satisfied:

- Be in accordance with applicable laws and acceptable good business practices.
- Attendance must be infrequent and limited to occasions where you cover your own meal and incidental expenses, so that no benefit is provided by the current or potential business associate.
- Be acceptable under the policies of the company employing the other party.

Employees shall not accept gifts (whether in the form of cash, services, or any other nature) from a customer, client, supplier, or other business. If you receive an unsolicited gift, report it to Ethics & Compliance or Legal for additional guidance.

Some examples of gifts and entertainment that are prohibited are:

- Payments of cash or cash equivalent (gift cards).
- Entertainment.
- Meals.
- Hospitality, such as resorts or trips.
- Paying travel expenses (as an exception, if an employee will give a presentation at a broadly attended conference, and the conference host does not otherwise do or plan to do business with SSP, the travel and lodging may be paid by the conference host provided all details are made available in advance to your supervisor and reviewed and approved by Ethics & Compliance and Legal).
- Gifts or entertainment to spouses or family members.
- Anything which could, if publicly disclosed, embarrass you or the Company.

### **3.9 Protection of Company and Government Assets**

Employees use and access to physical and intellectual assets—owned by SSP or owned by DOE and held by SSP for DOE’s benefit—are highly valuable and intended for use only to advance business purposes and goals. We are personally responsible for safeguarding these assets and for using all assets and resources appropriately.

Protect all physical property (facilities, computers, other equipment, and supplies) from misuse, damage, theft, or other improper handling. Use this physical property only for its intended purpose. This requirement extends to laptops, smart phones, USB/external storage media, digital cameras and other portable devices that offer convenient and easy access to information, whether you take work home or

across the globe. We must be vigilant in protecting systems and information from potential hackers and other parties who may attempt to access data.

- All employees are to protect DOE's and SSP's assets and ensure their efficient use for legitimate Company business purposes. SSP does allow the occasional, limited personal use of the Company's communication and information systems provided that the use does not represent a conflict of interest, and does not include pornographic, defamatory, or other inappropriate material.
- Employees and those who represent SSP are trusted to behave responsibly and use good judgment to conserve DOE and SSP resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.
- Be vigilant regarding access to our assets by others.

Access to Company intellectual or physical assets (including offices, facilities, and equipment) by any third party must be limited to and directly associated with services provided by the third party to the Company.

- Always keep devices in your possession and protect your passwords.
- Be sure to back up data.
- If a device is lost or stolen, report it immediately to IT so appropriate steps are taken to protect the Company's information assets.
- Notify the Legal Department of any inventions made during or because of employment with SSP.
- Comply with specific restrictions placed on the use and/or transfer of Company assets.
- Avoid the unauthorized receipt of the company confidential and proprietary information from others. Do not disclose to the Company or use for SSP's business any company confidential and proprietary information in your possession because of prior employment with another company.

### **3.10 Proper Use of Information Systems**

All employees, subcontractors, consultants, and others who have access to SSP's or DOE's computer resources, networks, intranet, internet access, email, and telephone systems, hold a duty to use and protect these assets responsibly and securely. These resources are provided for official government business purposes. SSP allows limited personal use as permitted by applicable DOE Orders and limited use policies, but personal use must be kept to a minimum and not detract from our work.

SSP will not tolerate use of government facilities or equipment for unauthorized, abusive, unethical, or inappropriate purposes. Never overuse or abuse Company assets for your personal use or gain or to conduct work on behalf of others. Improper use of these assets can be considered fraud or theft, depending on the circumstances.

Take care to avoid improper use such as:

- Frequent personal use that may cause congestion, delay, or disruption of service to any government system (such as streaming).
- Material that ridicules others based on 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, or 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 personal business.
- Communicating official Company business on behalf of SSP to external news groups, bulletin boards, or other public forums without authority.
- Use of Company-supplied computers to obtain protected information by accessing another computer without authorization.
- Releasing, not securing, or utilizing personally identifiable information for unauthorized purposes.

SSP may revoke or limit your privilege to use government resources for personal use at any time. If you do not comply with software licensing obligations, or abuse or misuse these privileges, SSP may revoke or limit your privileges.

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, or criminal prosecution.

### **3.11 Cyber Security**

SSP uses computer equipment and network systems to store and manipulate information and data to meet mission requirements and other SSP business needs. We are responsible for protecting this computer equipment, systems, information, and data from cyber risks. You are responsible for following

the security measures, internal controls, and mitigation strategies in established SSP and other site contractor policies and procedures regarding cyber security.

### **3.12 Confidentiality of Information and Records**

Keep SSP's business and client information Company Confidential. When in doubt, do not disclose information and guard it from inadvertent disclosure.

Many facets of SSP's operations are Company Confidential or business sensitive. Improper disclosure can create serious financial or competitive losses or disadvantages to the Company. In addition, improper disclosure can result in legal liabilities to the Company and individual employees. Examples of Company Confidential or business sensitive information 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.

We must never reveal Company 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. Access to prospective, current, or former employee records shall only be done with proper authority.

Individuals who generate, review, have custody, or otherwise have access to Controlled Unclassified Information (CUI) or Export Controlled Information (ECI) have the responsibility to identify, mark, and protect the information as appropriate.

If you discover or suspect the unauthorized use or release of Company Confidential information, notify management, Ethics & Compliance, Legal, or call the APTIM Ethics Line immediately.

### **3.13 Integrity of Records and Accounting Procedures**

We create documents and records in the normal course of business to assist in our decision-making process and to document our compliance with laws, regulations, and Company policies and procedures. All entries in the Company's books, records, and accounts must be complete, accurate, and fairly reflect our business transactions conforming to applicable accounting standards and legal requirements. This

pertains to all books, records, and information in any medium, including hard copies, electronic records, emails, video, backup tapes, and other media. Whatever your part in this process, SSP requires you to be honest and forthcoming – if you believe a transaction or payment cannot be accurately documented without raising legal questions or embarrassing the Company, do not complete the transaction, and notify your supervisor.

We must not improperly influence, manipulate, or mislead any authorized audit, nor interfere with any auditor engaged to perform an internal independent audit of SSP books, records, processes, or internal controls. Maintain essential information used for reporting, auditing, and other critical purposes in a recoverable format, and manage this information securely throughout the information’s life cycle.

- Always classify, store, and preserve records so that they are safe and protected.
- Dispose of books and records only in accordance with our policies.
- Don’t create or use hidden cash or bank accounts for any purpose. Except for normal and customary petty cash funds, which are strictly controlled, cash transactions are not allowed.
- If you become aware of litigation, investigations, or audits, suspend all record destruction.
- If you change jobs or leave SSP, be sure to properly transfer custody of all relevant books and records.
- If you approve reports or documents created by others, read them carefully and satisfy yourself that they are complete and accurate. Your signature is important—make sure you fully understand the implications before signing a document.
- Do not grant access to Company documents or records to any outside person, group, or agency. The requestor must contact the DOE to process a Freedom of Information Act (FOIA) request. If you have questions, contact Legal.

### **3.14 Communicating with the Public**

Modern businesses are under intense scrutiny from the press and the public, with many outlets for business information and news. Only authorized persons should speak on behalf of SSP. We need a clear consistent voice when providing information to the media and to the public. Unless the SSP Communications Department authorizes you to proceed, never give the impression that you are speaking on behalf of the Company, either verbally, written, or electronically.

Exercise caution when talking with journalists or writing communications that might be published. If you participate in online forums, blogs, newsgroups, chat rooms, or bulletin boards, never give the impression that you are speaking on behalf of SSP. Before you hit the ‘send’ button, think carefully.

Never send emails or post CUI, ECI, or SSP Company Confidential and Proprietary Information, and never send any other information that could be perceived as damaging to the Company's reputation.

- Never respond to media inquiries or initiate contact with the media, unless specifically authorized to do so by the SSP Communications Department.
- Be alert to situations in which you may be perceived to be representing or speaking on behalf of the Company.
- The SSP Communications Department must first review presentations and speeches that become public.
- In situations where you may be sharing information about our government operations, be sure to obtain the appropriate customer approval and consult with the SSP Communications Department prior to the public release of information. Failure to follow these strict guidelines may damage our contracts.
- Refer all inquiries from the media, financial analysts, and investors to the SSP Communications Department. Refer regulatory or governmental inquiries to Legal.

### **3.15 Political and Charitable Contributions**

We encourage employees to participate in the political process, and to support charitable causes, always keeping in mind that your political and charitable activities are a personal matter. SSP employees who wish to make contributions to political parties, candidates, or campaigns for public office, or make donations to charities must do so in their own name, on their own behalf, on their own time, and not as representatives of the Company.

Charitable and other contributions on behalf of SSP must be approved in advance by Legal in accordance with Company Policy.

- Never put pressure on a colleague to participate in a political cause or to make a charitable contribution. If you experience such pressure, especially from a supervisor, report it.
- Do not solicit contributions or distribute non-work-related materials during work hours or using government resources.
- You must never make a political or charitable contribution with the intent to improperly influence someone.
- All political and charitable contributions made on behalf of the Company must be accurately recorded in the Company's books and records.

## 4.0 OUR RESPONSIBILITIES AS CORPORATE CITIZENS

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### 4.1 Fair Business Competition

SSP believes in free and fair markets, and we compete in a legal and ethical manner on the basis of the quality of our services. We are committed to compliance with fair competition and anti-trust laws that apply. These laws are intended to prohibit practices that restrain trade or unduly limit free and fair competition. Fair competition violations include agreements with customers, suppliers, competitors, and others, such as:

- Mutual understandings to control prices.
- The boycotting of certain suppliers or customers.
- Attempting to affect competition by selling the same product at different prices to different customers.
- Making agreements to rig bids or proposals.
- The allocation of products, territories, or markets.

All employees should be aware of our policies in this area, but awareness is especially important for individuals in procurement and related positions. If you are a member of trade and professional associations or are planning to attend meetings of such trade or professional associations, make sure you know and understand our anti-trust policies.

Remember: fair competition and anti-trust laws are complex and can have an impact on our business in many ways, including our relationships with our suppliers and sales. Violation of the rules can have serious consequences for the Company, as well as for anyone acting on our behalf.

- Do not enter into agreements with customers, suppliers, competitors, or others that are intended to unfairly limit competition.
- Make purchases strictly based on quality, price, and service.
- Do not share information with a competitor about our customers, pricing, or market strategies.
- Don't discuss any aspect of bidding with any of our competitors.
- Never share competitor information with customers or vendors.
- Never discriminate unfairly in terms of price or services between similar customers.
- When you have any doubt about dealings with competitors, suppliers, or customers, you must consult with the Procurement Department.

## 4.2 Trade Restrictions and Export Controls

The Company respects all U.S. and foreign laws pertaining to export controls and trade restrictions, as well as U.S. anti-boycott provisions. U.S. law requires that specific licenses must be received before the export or re-export of U.S. origin products, services, or technology to specified countries or entities, as well as to, or for, certain end users. The following are examples of actions that are prohibited by U.S. trade restrictions and export control laws:

- Dealing with specifically identified boycotted countries, or persons, or entities acting on their behalf.
- Transactions involving narcotics traffickers and terrorists.
- Unlicensed exports for end users related to nuclear explosives, missiles, chemical and biological weapons, and maritime nuclear propulsion. U.S. laws also prohibit anyone acting on behalf of the Company from participating in boycotts not sanctioned by the U.S. government. The Company is also required to promptly report any request to join in, support, or furnish information concerning a non-U.S. boycott. It is imperative that you know who you are dealing with and the ultimate destination and end use of products that we sell.

Obtain advice from the Legal or Procurement Department before you make any commitments concerning export or re-export of goods, services, technology, or software.

- Before engaging in any export/import transaction, be sure that the transaction is not prohibited, you have applied for and received all regulatory approvals, and you have secured all needed licenses.
- If you are regularly involved in export or import, be thoroughly familiar with government prohibitions and source-specific information regarding those transactions.
- Remember that displaying any technical data at both foreign and domestic trade shows may require export authorization.
- Do not do anything that would facilitate business with any country subject to an embargo by the United States or by the host country.
- Be familiar with the Company's Anti-Boycott Policy, its checklist of criteria for potential offending language or provisions, and its list of boycotting countries.
- Promptly report any request for information concerning a foreign boycott—and any other information you may learn about such a boycott—to the Procurement Department.
- Take reasonable measures to ascertain the “end-user” identity and the location and intended use for products that are exported.

### **4.3 Environmental Stewardship**

SSP prioritizes environmental protection and the health and safety of our employees and communities. We continuously improve performance through resource conservation and efficient practices. From advanced technologies to hazardous waste management, SSP ensures safe, responsible operations.

We measure our environmental performance and work to promote environmentally friendly practices that respect our environment and our natural resources. Each of us must do our part to help meet SSP's environmental goals:

- Take responsibility for ensuring that our operations meet applicable government and Company standards.
- Safely handle, transport, and arrange for the disposal of raw materials, products, and wastes in an environmentally responsible manner.
- Promptly report any breaches of environmental protection laws or SSP's policies.
- Participate in all required training to develop and improve your skills and knowledge and perform your job safely and in an environmentally sound manner.

### **4.4 No Child or Forced Labor or Human Trafficking**

SSP strongly believes that all individuals should be treated with dignity and respect. SSP is committed to fostering an environment that recognizes and supports human rights. SSP does not tolerate the use of child or forced labor, trafficking in persons, or procurement of commercial sex acts. You must also work to ensure that SSP does not have suppliers, contractors, or other business partners who do so.

### **4.5 General Prohibition on Lobbying**

Lobbying is any attempt by SSP directors, officers, employees, agents, representatives, or contractors to influence federal, state, or local government officials to act, or to not act, in a given manner (such as a vote on legislation or a procurement decision). Lobbying can occur directly, through interactions with a government official, or indirectly, through a member of that official's staff. Lobbying can occur in many forms including meeting with Congressional staffers and participation at committee hearings.

For the avoidance of doubt, lobbying does not include (i) actions to influence the government Contracting Officer and her or his advisors as part of the administration and performance of the SSP Contract; (ii) informing and educating government officials, at their specific written request, subject to strict rules that prohibit veering "off topic" from the specific area of discussion identified in the request; or (iii) accommodating Congressional visits to the SSP operated facilities, including providing tours.

As a rule, lobbying by SSP directors, officers, employees, agents, representatives, or contractors is strictly prohibited.

As a limited exception, lobbying can be conducted if all of the following requirements are satisfied: (i) the SSP Board of Managers has approved a policy (“Lobbying Policy”) permitting limited lobbying, which policy satisfies all statutory, regulatory, and contractual obligations; (ii) the SSP President and Project Manager approves the lobbying on a case basis after consultation with the Legal Department; (iii) the lobbying is performed in full compliance with the Lobbying Policy to include all costs, which qualify as lobbying, being charged to a specified disallowed cost charge code to ensure no costs are invoiced to DOE under the Contract; and (iv) the lobbying is coordinated with the Director of Government Relations at SSP member Company, BWXT, to ensure that all obligations regarding the reporting of lobbying activities are satisfied.

## 5.0 RESOURCES

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### 5.1 How Can I Get Help and Report Concerns?

If you face an issue and need to get help or report a concern, you should normally proceed first by contacting your immediate supervisor. However, if you are uncomfortable discussing the matter with your supervisor or their response isn't adequate, contact Human Resources—Employee Relations, Ethics & Compliance, or Legal:

- SSP Human Resources — Employee Relations 504.734.4694
- SSP Ethics & Compliance 504.734.4634
- SSP Legal 504.734.4254

If you are still uncomfortable using the resources listed or wish to raise a concern anonymously, contact the APTIM Ethics Line, available 24/7, either online or by phone.

- APTIM Ethics Line (portal) <https://aptim.caseiq.app/portal>  
(hotline) 1.866.921.6714

You have an obligation to promptly contact any of these resources if you know of or suspect misconduct, even if you aren't involved in the misconduct itself. Reporting misconduct contributes to our ethical culture and helps us minimize damage to fellow employees, other stakeholders, the Company, and our brand. Not reporting violations of our Code may result in discipline.

If you're concerned about retaliation, SSP is committed to doing the right thing. You will be protected from retaliation if you report suspected illegal or unethical conduct in good faith.