

Guideline Summary

1. Only authorized CHBWV procurement personnel have the authority to enter into procurement contracts with suppliers.
2. CHBWV employees may not accept gifts or social entertainment from suppliers.
3. CHBWV employees may not accept reimbursement, honoraria, loans, or other personal services from suppliers.
4. CHBWV obeys anti-kickback and anti-bribery laws.
5. CHBWV employees may not serve suppliers as an employee, director, officer, or agent.
6. CHBWV prohibits discrimination and harassment in its dealings with suppliers.
7. CHBWV will protect the confidential information its suppliers entrusts to the company and expects its suppliers to do the same.

Questions?
Contact your authorized
Procurement Representative

Or Dave Pritchard,
Procurement Manager,
716-942-4544

Project Partners



**U.S. Department
of Energy**



**New York State
Energy Research
& Development
Authority**

CH2M HILL BWXT West Valley, LLC (CHBWV)

The West Valley Demonstration Project is a U.S. Department of Energy-led nuclear cleanup site located approximately 35 miles south of Buffalo, NY. CHBWV operates the site for the Department of Energy and the site's owner, the New York State Energy Research & Development Authority.

10282 Rock Springs Road
West Valley, NY 14171-9799

www.chbwv.com

West Valley Demonstration Project



**Business
Conduct Guidelines**

Business Conduct Guidelines

At CHBWW, we recognize the value of our suppliers as contributors to our corporate success. We hope that in return we also contribute to your success. In order for us to develop and maintain mutually beneficial relationships with our suppliers, we must always conduct our business with the highest regard for legal and ethical standards. Likewise, we expect the same from our suppliers. This pamphlet has been prepared as a guide for maintaining a good working relationship with CHBWW. We ask that you familiarize yourself with our policies and ensure that any of your employees who interact with CHBWW employees are aware and abide by them.

Know Your Contact

We are proud of the expertise and integrity of our procurement staff. To be sure that you receive the highest level of service, commitments should be entered into with authorized personnel only.

Gifts

When dealing with or making decisions affecting suppliers, our employees must be careful not to inadvertently obligate themselves or our company to a supplier. In conducting business with you, our employees are expected to act fairly, objectively, and in the best interest of the company at all times. Therefore, our employees may not accept gifts or gratuities from suppliers. If a gift is received which is inconsistent with these guidelines, it will be returned.

Entertainment

It is important that we make our sourcing decisions in an objective and unbiased manner. Since accepting social entertainment from a supplier may affect or give the appearance of affecting impartiality, our employees may not accept social entertainment offers from our suppliers, including business meals and receptions.

Reimbursements

Speaking at supplier-sponsored events is one way CHBWW builds and maintains a positive working relationship with its suppliers. The costs associated with this type of engagement, however, are business expenses which must be borne solely by CHBWW. Under no circumstances may our employees accept payment or gratuity for speaking engagements, including reimbursement for travel or hotel charges, speaker fees, honoraria, payment for consulting services, loans, or personal services.

Conflicts of Interest

It is critical that our employees avoid personal situations which may conflict or give the appearance of conflict with their responsibilities to the company and its customers. Accordingly, our employees may not serve any company supplier in the capacity of officer, director, or agent.

Kickbacks and Bribes

Kickbacks and bribes are illegal under federal and many state and foreign laws. CHBWW is committed to full compliance with anti-kickback and bribery laws.

Respect

Procurement decisions are made on the basis of price, quality, and other business considerations. CHBWW will not engage in any form of discriminatory conduct in the selection of its suppliers. CHBWW does not tolerate its employees or agents engaging in verbal or other forms of harassment in the workplace. We pledge that the interactions with our suppliers and others whom our employees come in contact will be conducted in a respectful manner. Similarly, we expect mutual respect from our suppliers.

Confidentiality

Sharing information is often necessary to meet our business needs. Our employees are responsible for protecting information entrusted to them by third parties. We expect our suppliers to provide the same level of protection for confidential CHBWW Information entrusted to them.

Additional Guidelines

These guidelines represent the minimum ethical standards surrounding our business relationship. Any additional limits will be communicated to you by the way of a specific subcontract or Purchase Order.