

## **Business Conduct Guidelines**

At CHBWV, 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 CHBWV. We ask that you familiarize yourself with our policies and ensure that any of your employees who interact with CHBWV 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 staff 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 CHBWV 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 CHBWV. 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 that may conflict with or give the appearance of conflict with 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. CHBWV 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. CHBWV will not engage in any form of discriminatory conduct in the selection of its suppliers. CHBWV 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 with 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 CHBWV 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 way of a specific subcontract or Purchase Order.

## Guideline Summary

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

Questions?  
Contact your authorized  
Procurement Representative

Or Lynn Hollfelder  
Procurement Manager  
716.942.4789

## Project Partners



U.S. Department of Energy



New York State Energy  
Research and  
Development Authority

## CH2MHILL • BWXT West Valley, LLC

*West Valley Demonstration Project*

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

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## West Valley Demonstration Project



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