

## Guideline Summary

1. Only authorized Four Rivers NP procurement personnel have the authority to develop a procurement contract with suppliers.
2. Four Rivers NP employees may not accept gifts or social entertainment from suppliers.
3. Four Rivers NP employees may not accept reimbursement, honoraria, loans, or other personal services from suppliers.
4. Four Rivers NP will obey anti-kickback and anti-bribery laws.
5. Four Rivers NP employees may not serve suppliers as an employee, director, officer, or agent.
6. Four Rivers NP prohibits discrimination and harassment in its dealings with suppliers.
7. Four Rivers NP and its suppliers will establish a confidentiality agreement to protect sensitive information.

Questions?

Contact your authorized Procurement Representative

OR contact

[FRNPPProcurement@pad.pppo.gov](mailto:FRNPPProcurement@pad.pppo.gov)

## Project Partners



The Paducah Gaseous Diffusion Plant (PGDP) was constructed in 1952 to produce enriched uranium, initially for the nation's nuclear weapons program and later for nuclear fuel for commercial power plants. The plant is owned by the Department of Energy (DOE), which oversees the environmental cleanup activities at the site. Four Rivers Nuclear Partnership, LLC is responsible for the deactivation and remediation at the plant.

Four Rivers Nuclear Partnership, LLC.

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## PADUCAH DEACTIVATION AND REMEDIATION PROJECT



## BUSINESS CONDUCT GUIDELINES

October 2017

## **Business Conduct Guidelines**

At Four Rivers NP, we recognize the value of our suppliers as contributors to our corporate success, and in return we also contribute to your success. 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 Four Rivers NP. We ask that you familiarize yourself with our policies and ensure that any of your employees who interact with Four Rivers NP 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, subcontracts or Purchase Orders should be conducted 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 always expected to act fairly, objectively, and in the best interest of the company. 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 Four Rivers NP 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 Four Rivers NP. 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.

### **Conflict 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. Four Rivers NP 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. Four Rivers NP will not engage in any form of discriminatory conduct in the selection of its suppliers. Four Rivers NP 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 Four Rivers NP 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 through a specific subcontract or Purchase Order.