

Policy

Supplier Code of Conduct

**Idaho
Cleanup
Project**

Idaho Environmental Coalition, LLC, is the
Idaho Cleanup Project contractor for the
U.S. Department of Energy

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1. PURPOSE

To provide clarification on the Idaho Cleanup Project (ICP) contractor's, the Idaho Environmental Coalition, LLC (IEC), mission, vision, and values and to set a standard for the code of conduct of its suppliers.

2. INTRODUCTION

IEC holds its suppliers and contractors to the same standards that IEC holds for itself. Therefore, suppliers are also required to do what is necessary to understand and comply with these expectations. The mutual success and business relationships of both parties depends on it. Running a good business means running a safe, socially responsible, and ethical business that extends well beyond IEC.

IEC does things right and adheres to laws and regulations. IEC always acts with integrity by taking responsibility for its work, caring for its people, and staying focused on safety and sustainability. IEC makes investments in its clients, people, and communities so that all can grow together.

2.1 Our Reputation

2.1.1 IEC always puts honesty and integrity at the forefront of how it conducts business. Over the past several years, IEC employees have earned a solid reputation through countless interactions with clients, suppliers, and authorities.

2.1.2 IEC works on projects representing billions of its clients' dollars, and to do this, IEC must have its clients' trust. IEC always holds itself – and its suppliers – to the highest ethical standards. IEC's supplier code of conduct is designed to provide clarity about the expectations of its partners to meet its clients' needs, including suppliers. This policy is an overview of the guiding principles and values that govern how IEC conducts business and makes ethical decisions.

2.2 Supplier Responsibility

2.2.1 Supplier supply chain: When a supplier works with IEC, the supplier must ensure that its supply chain complies with this code of conduct.

2.2.2 Suppliers and contractors can view the ICP [POL-158](#), "Code of Business Conduct and Ethics Policy," which defines these expectations for IEC employees on IEC's [Procurement webpage](#).

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2.3 Asking for Help and Reporting Concerns

- 2.3.1 If a supplier becomes aware of any ethical issues that may affect IEC, or has any concerns or questions, the supplier should contact its ICP Supply Chain point of contact. If preferred, the supplier may call the Jacobs Integrity Hotline: 1-844-543-8351 and remain anonymous.
- 2.3.2 For questions, comments, or training support about IEC’s expectations, contact the ICP Supply Chain representative or ICP Supply Chain manager.

2.4 Compliance

- 2.4.1 IEC will assess the supplier’s compliance with this code of conduct and regularly review supplier qualifications, representations, and certifications, as well as reserves the right to conduct audits and thoroughly investigate possible non-compliance with this code of conduct. IEC strives to be prompt and fair in its investigations and conduct them confidentially to the extent possible under the circumstances. If the supplier is involved in an audit or investigation, it must cooperate fully and comply with any required corrective measures. Any violations of this code of conduct or failure to cooperate in an audit or investigation may jeopardize the supplier’s business relationship with IEC, up to and including the termination of any contracts a supplier has with IEC.

2.5 Relationships

- 2.5.1 IEC values strong, long-term relationships with its clients and suppliers. IEC knows that its relationships are strengthened when fundamentals such as safety, social responsibility, integrity, and business ethics are aligned. IEC appreciates its suppliers doing their part and helping it continue to build and maintain its hard-earned reputation, today and in the future.

3. POLICY**3.1 Health, Safety, Security and Environmental Considerations**

- 3.1.1 The health, wellbeing, safety, and security of IEC employees, IEC supply partners, and everyone associated with IEC work is of utmost importance at ICP. IEC is committed to adhering to the highest standards of safety and security practices, but more than that, safety, security, and wellbeing are intrinsic to how IEC does business. IEC is committed to a “culture of caring” where safety and security is engrained in everything it does.

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3.1.2 IEC’s culture of caring also extends to how it approaches the environment and sustainability. It is important that IEC suppliers strive to balance the social, economic, and environmental aspects of their businesses just as IEC does for its business and for its clients’ businesses.

3.1.3 Suppliers must always:

- Comply with applicable health, safety, and environmental laws and regulations
- Apply safe work practices to all activities and instill a safety culture in work environments and processes
- Focus on incident prevention and minimizing exposure to health risks
- Develop and implement emergency response plans and procedures, delegating and training responsible emergency response personnel
- Develop, implement, and maintain environmentally responsible business practices
- Work to deliver sustainable, efficient, and effective goods, services, and solutions
- Report, immediately, any incident, unsafe act, situation, or insecure environment
- Refrain from possession or transportation of any contraband, prohibited, or restricted items
- Report any enquiry by law enforcement or other government agencies regarding the company, its personnel, and its activities
- Design out hazards to minimize risk in construction, use, and maintenance and implement collective control measures over personal protection.

3.2 Quality

3.2.1 IEC is dedicated to delivering a superior client experience and value. IEC strives to satisfy its clients and exceed their expectations through high-quality and innovative solutions.

3.2.2 Suppliers must always:

- Have the same commitment to quality in the goods, services, and solutions with which is supplied to IEC
- Ensure that all goods, services, and solutions supplied to IEC comply with applicable laws and regulations.

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3.3 Observance of Competition and Anti-Trust Rules

- 3.3.1 IEC is committed to conducting its business in full compliance with anti-trust and fair competition laws.
- 3.3.2 Suppliers must never engage in anti-competitive business practices intended to limit or impair full and open competition for the goods, services, and solutions provided to ICP.

3.4 Conflict of Interest

- 3.4.1 IEC suppliers and contractors, their employees, and their family members must not receive improper benefits through their relationship with IEC or allow other activities to conflict with acting in the best interest of IEC. A conflict of interest occurs when personal or financial interests interfere with the ability to make sound and objective business decisions on IEC's behalf.
- 3.4.2 Suppliers must always:
- Avoid situations that create even the appearance of this kind of bias. A perceived conflict of interest that calls into question IEC's business integrity can be as damaging to IEC's reputation and business as the existence of an actual conflict.
 - Disclose any potential conflict of interest to IEC for review and prior to entering into any business transaction.

3.5 Bribery and Corruption

- 3.5.1 IEC secures and executes projects honestly and ethically.
- 3.5.2 Suppliers must always:
- Understand and comply with the "Foreign Corrupt Practices Act" (15 USC 78dd-1), the "Bribery Act" (2010 c. 23 [UK Public General Act]), and other applicable anti-corruption laws
 - Avoid any conduct that could reasonably be perceived by IEC customers or others as improper
 - Inform IEC immediately about any attempt made to bribe the supplier or solicit bribes from the supplier while working with IEC
 - If the supplier receives a request from an IEC employee or representative which the supplier reasonably believes is or may be (or may be perceived to be) a solicitation for a bribe, kickback, or other corrupt payment, IEC expects the supplier to refuse the request and inform IEC

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- If the supplier is offered or is aware of anyone else who is offered an inappropriate, or suspicious gift, award, hospitality, or business courtesy, IEC expects the supplier to report it.

3.5.3 Suppliers must never:

- Solicit or accept anything of value from a client representative, supplier representative, or anyone else which might be perceived as compromising (or actually compromises) the supplier's honest service to IEC or its clients
- Offer or give anything of value to improperly obtain new business, retain existing business, or secure any improper advantage
- Permit or authorize others to offer or accept anything of value for an improper purpose
- Make any type of facilitation payment (i.e., small "grease" payments to expedite an action by a government official or employee), even if such payments are a common business practice or legal under local law
- Furnish gifts, meals, hospitality, travel, or other business courtesies to government officials if this would be illegal or could reasonably be perceived as improper
- Make payments to political parties, party officials, or candidates for political office that are illegal or could reasonably be perceived as improper
- Offer anything to an IEC employee or family member of an IEC employee that could be interpreted as an attempt to influence the employee or put the employee under an obligation
- Give a gift to the IEC employee, except an advertising or promotional item of nominal value.

3.6 Inclusion and Diversity

- 3.6.1 IEC lives inclusion. IEC puts people at the heart of its business. IEC has an unparalleled focus on inclusion, with a diverse team of visionaries, thinkers, and doers. IEC embraces all perspectives, collaborating to make a positive impact.
- 3.6.2 Today is an opportunity to live IEC's values by speaking up and speaking out against injustice. IEC is committed to driving and achieving real change – creating a tomorrow everyone can be proud of, standing together as one.

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- 3.6.3 ICP is a part of the global Jacobs' [*Action Plan for Advancing Justice and Equality*](#), which builds on Jacobs' existing global inclusion and diversity strategy, TogetherBeyondSM, and sets actionable initiatives and measurable objectives in IEC's continuing efforts to address embedded and systemic racial inequities.
- 3.6.4 IEC believes that an inclusive environment enhances innovation and motivates the people that drive the company's growth.
- 3.6.5 IEC works to attract and retain diverse suppliers – large and small.
- 3.6.6 Suppliers must always provide fair and equal treatment to all in hiring, promotion, training, compensation, termination, and disciplinary action.
- 3.6.7 Suppliers must never discriminate on the basis of age, culture, disability, education, gender, marital status, regional or national origin, sexual orientation, political affiliation, physical appearance, race, religion, or any characteristic protected by law.

3.7 Human Rights

- 3.7.1 IEC respects the human rights and dignity of individuals within its operations, supply chain, and communities where it does business. Suppliers must always:
- Respect human rights in its operations, supply chain, and communities where you do business and avoid any involvement in human rights abuses
 - Comply with applicable laws regarding equal opportunities, forced labor, child labor, human trafficking, modern slavery, working hours, freedom of association, collective bargaining, recruitment, and fair wages
 - Treat all workers with respect and dignity
 - Conduct all operations in a harassment-free and nondiscriminatory manner
 - Promote and support inclusion and diversity in the workplace
 - Promote and protect health, safety, and security in the workplace
 - Provide a confidential, anonymous mechanism via which workers may report concerns and ensure that whistleblowers are protected against retaliation
 - Provide and/or cooperate in the provision of effective remedy when adverse human rights impacts occur as a result of the supplier's activities.

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3.7.2 Suppliers must never:

- Require workers to pay employers' or agents' recruitment fees or other related fees for their employment
- Retain or impede workers' access to personal identification documents and possessions.

3.8 Integrity of Financial and Performance Records

3.8.1 IEC relies on accurate information and reliable records to make responsible business decisions.

3.8.2 Suppliers must always:

- Comply with good practice and relevant standards and laws pertaining to record keeping and record retention
- Engage in honest and accurate recording and reporting of information
- Keep accurate and complete records as required by IEC.

3.8.3 Suppliers must never make false, overstated, artificial, or misleading entries or omissions in any system, book, or record for any reason.

3.9 Trade and Export Control

3.9.1 IEC complies with all international trade laws and regulations that apply to it wherever IEC conducts business.

3.9.2 Suppliers must always:

- Understand and comply with applicable laws and regulations relating to export, trade, non-proliferation, and arms control.
- Understand and comply with import laws and regulations designated by U.S. Customs Border Protection and other applicable customs agencies.
 - Understand and comply with any applicable trade sanctions and supply, when requested, product level Trade Compliance classifications such as Export Control Classification Number (ECCN), Harmonized Tariff or Schedule B, and/or U.S ML Category (ITAR).

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- Ensure that products supplied to IEC or its clients do not contain metals derived from “conflict minerals” that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or any adjoining country, as well as other products sanctioned or restricted by the United States. This includes Federal Acquisition Regulation (FAR) 889, “Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment,” Subsection (a)(1)(B), related to Chinese telecommunications and surveillance equipment manufacturers. Provide certification and reporting of compliance as requested.
- Ensure that all sub-suppliers and personnel are not subject to denied or sanctioned party restrictions. Immediately notify IEC of any violation or pending action of violation.
- Provide all documentation needed to file for final right of duty drawback when requested.

3.9.3 Suppliers must never participate in boycotts or other restrictive trade practices prohibited or penalized under United States or applicable local law and knowingly violate or circumvent any applicable trade laws.

3.10 Money Laundering Prevention

3.10.1 IEC is committed to complying with applicable anti-money laundering and anti-terrorism laws. IEC only conducts business with reputable customers and suppliers involved in legitimate business activities with funds derived from legitimate sources.

3.11 Confidentiality and Security

3.11.1 IEC deals with various types of proprietary, confidential, and personal information belonging to ICP and its clients, suppliers, employees, and others (collectively “confidential information”).

3.11.2 Suppliers are required to:

- Use confidential information only as authorized and intended
- Protect and secure all confidential information entrusted to the supplier by employing adequate internal controls in work processes and security measures for all written and printed data, as well as computer systems, portable electronic devices, laptops, and other storage devices
- Comply with all applicable laws and regulations related to confidential information handling and processing.

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3.12 Media

3.12.1 IEC maintains ICP’s well-earned reputation – and the reputations and confidentiality of its clients – by presenting a consistent message to print and online media. All requests for media interaction should be directed to the ICP Communications manager.

3.12.2 Suppliers must always ensure any communication about IEC, its customers, or work together, including but not limited to, marketing materials and channels (e.g., your website, annual reports, event materials), client and public presentations, press releases, social media posts, or media interviews, are approved prior to publication or broadcast by ICP’s Communications team.

3.13 Contact Information**3.13.1 Subject Matter Experts**

- Suppliers may contact IEC subject matter experts when it needs someone to explain policies, laws, and business practices in their particular area of expertise.

3.13.2 Compliance and Ethics Hotline

- If the supplier is uncomfortable using one of the other resources identified in this supplier code of conduct, it may contact the Jacobs Integrity Hotline at <https://integrity.jacobs.com> or by calling 1-844-543-8351.

4. REFERENCES

15 USC 78dd-1 “Foreign Corrupt Practices Act”

2010 c. 23, “Bribery Act 2010”

FAR, Section 889, “Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment,” Subsection (a)(1)(B)

Jacobs, *Action Plan for Advancing Justice and Equality*

POL-158, “Code of Business Conduct and Ethics Policy”