

# CODE OF ETHICS

STOP, THINK, ASK



## A message from Iain Stevenson, CEO

**As we continuously improve our business practices, we must hold firm to our high standards of ethical conduct.**



Our behaviours and ethics are fundamental to who we are and what we do. Our success relies on our relationships with customers, shareholders, external regulators, suppliers and each other. These groups, along with other organisations and individuals we interact with, take a close interest in what we do.

A key determining factor of our reputation is how we all behave – both collectively and as individuals. Our Code of Ethics offers clear standards and guidance for when you are representing AWE or act on behalf of the company. Each AWE employee is individually accountable for upholding the high standards outlined in the Code.

The Code supports the company's behaviours of, We keep our promises, We are safe and secure, We connect with respect and We embrace simplicity all of which you will uphold if you demonstrate the standards and values AWE expects of you. The Code is a guide to making good choices and represents our commitment to doing the right thing and acting with integrity.

The Code is set out in six sections: Safety and Security, Working with Integrity, Valuing People, Customer Relations, Protection of Assets and Data, and Responsible Organisation. Within each section there are a number of topics in which consideration of our ethical behaviour is important.

Alongside a brief explanation of each topic the Code gives an example of a dilemma you might encounter. It gives you the opportunity to consider what action you would take. It does not cover every topic in which an ethical issue may arise nor every situation that you might encounter, but it does give you guidance and confirms the standards you must meet and the types of behaviour we expect in our interactions with our colleagues, suppliers, stakeholders and the wider community.

We also expect the same standard of ethical conduct from any suppliers or integrated personnel working on our behalf. In addition to this guidance, I encourage you to talk to your line manager, AWE's Corporate Ethics Office, an Ethics Ambassador or HR Business Partner, particularly if an ethics-related issue or question arises.

**You are responsible for understanding and following this Code.** Thank you for committing to the high standards for ethics that are essential to AWE's success.

### Ethics Training

**Everyone must complete the mandatory annual ethics training. In addition, there will be other opportunities throughout each year for ethical discussions. There are also a number of relevant training courses on Minerva covering topics such as Whistleblowing, the Bribery Act (2010), Harassment and Bullying and Sexual Harassment at Work.**

## AWE Behaviours

Our behavioural framework is a set of core behaviours which defines how we are expected to behave and the impact we have on people day-to-day through what we say and what we do.

### We keep our promises

We take proactive and decisive action to follow through on commitments to deliver our mission, showing accountability to achieve excellence, and create trust.

### We are safe and secure

We uphold a culture of care, we take pride in creating an environment where all feel safe and secure, operating in a way that protects others, our business and our nation.

### We connect with respect

We combine our expertise, celebrate, and leverage our differences, working collaboratively to achieve our mission, always acting with integrity, trust and respect.

### We embrace simplicity

We know when to positively challenge assumptions to make things simpler and better. We are curious and use insight to seek out new ways of working and to challenge the status quo. We listen, we learn and seek out the best ideas.

## Making good decisions

**The theme of this Code is STOP, THINK, ASK.**

There will be times when we are faced with a difficult decision or an ethical dilemma, where what we are being asked to do may feel wrong, not quite right, or a little uncomfortable. Everyone should feel empowered to constructively challenge the request and those making the request should embrace constructive challenge and be able to offer a clear and reasonable response. AWE has a decision-making tool to assist you.

When faced with a difficult decision or ethical dilemma, **STOP, THINK, ASK:**

- Does my decision feel right?
- Does it align with our behaviours and expectations?
- Is it consistent with our policies and processes?
- Would I be happy explaining it to my colleagues?
- Have I considered the potential consequences?

As a guide, if you can answer YES to all the questions, then it looks like a good decision. But the decision is still yours. If you remain in doubt, talk to your manager or contact the Ethics Office.

## Safety and Security

### Safety

**AWE should be a safe place to work. No-one should come to any harm because of the work we do. The company highlights safe practices but we also have a personal responsibility for the things we must do to keep ourselves and our colleagues safe.**

**For example, we must:**

- Always wear the right equipment
- Always work within any statement or risk assessment that applies to the job
- Only operate equipment if we are fully qualified or suitably trained
- Only operate equipment in accordance with its operating instructions
- Behave responsibly when there are risks
- Report any accident, dangerous occurrence or abnormal event
- Report any conditions or work practices that aren't safe

**Always ask if you're not sure about how to do something or if you feel you are being asked to do something that's not safe.**

### Dilemma

Ben is about to start a process that is carried out regularly. However, as he is about to start, his manager, John, comes along and tells him that they need to speed things up today as they are under a lot of pressure. He would like Ben not to carry out the checks at the beginning of stage six of the process. He tells Ben that in 21 years, nothing has ever gone wrong so the checks are no doubt unnecessary anyway. Ben is unsure. He thinks there must be a reason for the checks although no-one has ever explained that to him, but he thinks it must be important to carry them out to know if it is safe to continue with the process.

### What should Ben do?

1. Do as his manager says and skip the checks
2. Continue with the process including doing the checks
3. Stop before he starts the process and ask a colleague for advice

It is never good practice to take risks when it comes to safety. If Ben is unsure why the checks are carried out, he should ask so that he understands. In this case, he should either stop and ask, or continue but carry out the checks. His manager should not put him in the position where he is being asked to compromise safety or where Ben feels he has to defy his manager to do what is right.

## Security

**AWE processes a huge amount of sensitive information. It's everyone's responsibility to make sure our information and our people are safe and secure.**

**For example, we must:**

- Always know the security policies that relate to our area
- Have the courage to speak up if we think something's wrong
- Make sure all our Official Sensitive (OS) and above assets and documents are locked away at the end of the day
- Make sure we process, store and communicate information based on its classification
- Check the classification of our documents before we scan or email to our official network, Ozone. If in doubt, seek advice first. Your Line Manager, Local Classification Practitioner (LCP) or Local Classification Authority (LCA) can help you
- Behave in a way that won't put our security clearance at risk, at work and in our personal lives
- Make security part of everyday decision making
- Understand the threats we face
- Ask if we're unsure of the policy

## Dilemma

Claire is working on a Secret document. Her manager asks her to print a copy so he can take it home to read. Claire explains that Secret cannot be taken home without authority so her manager tells her to delete the 'Secret' markings so he can take it home. He says he will take responsibility if he's caught.

## What should Claire do?

1. Do as her manager says and prepare the document
2. Refuse and tell him to ask someone else
3. Refuse and report the matter to the Security Department

It is never acceptable to willingly bypass a security measure on your own authority. Claire should refuse to do this and report the matter. By not reporting it, she would be allowing the behaviour to continue. It's not easy standing up to a manager. But we all have a responsibility to make sure this kind of behaviour is highlighted and addressed.

## Drug and alcohol abuse

**Being mindful of safety means taking responsibility for our actions and ensuring we don't endanger others. Working under the influence of drugs or alcohol can put us and others at risk.**

It is vital that we protect our workplace and all our workers from these risks. However, it is also important to remember our duty of care towards those who do abuse these substances by providing supportive mechanisms to help them with their addiction. Both safety and security can be compromised by colleagues who are addicted to harmful substances.

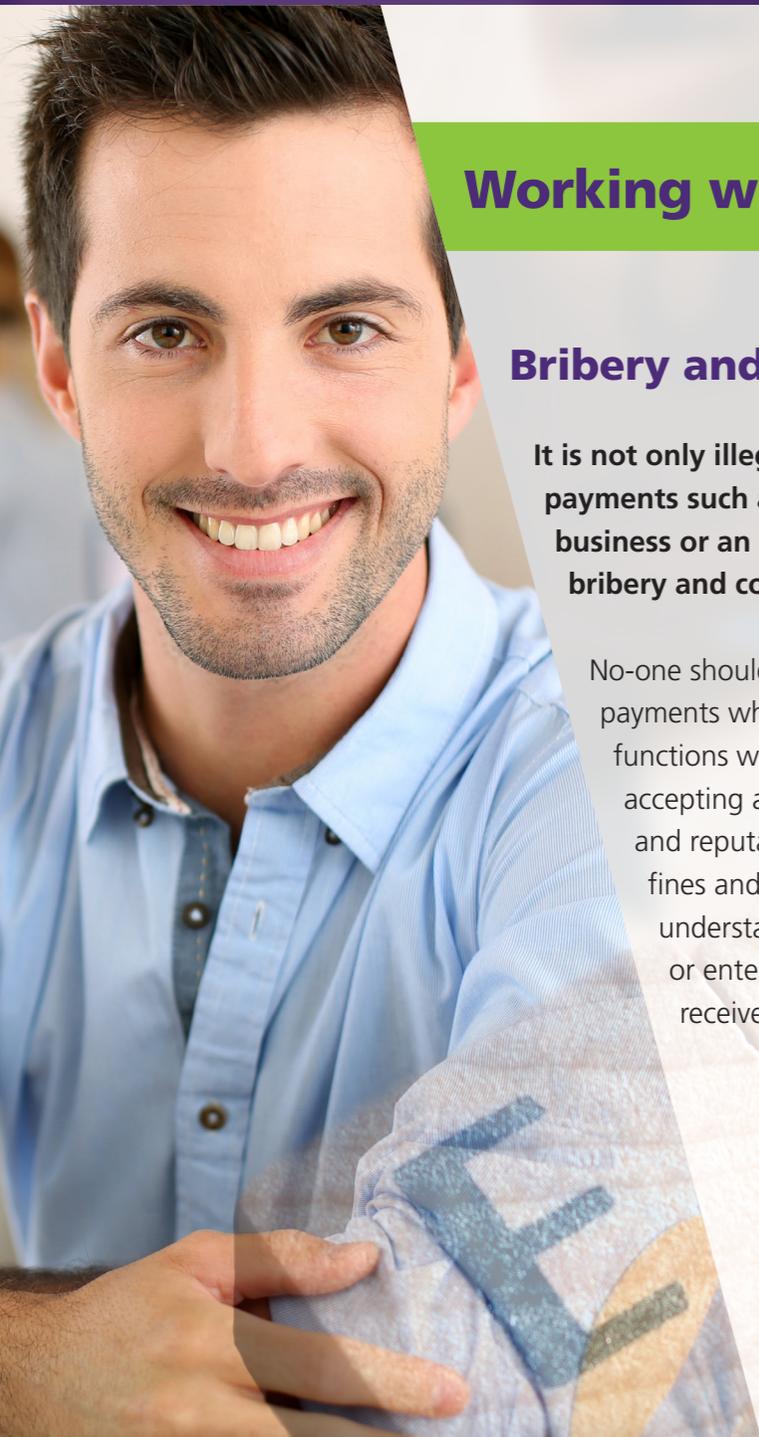
## Dilemma

Sarah comes in to work. She is acting a little strangely: she doesn't seem to be completely awake, she is wobbling when she walks and she looks pale and washed out. When Jackie goes over to her to ask if she is all right, she smells alcohol on Sarah's breath.

## What should Jackie do?

1. Report Sarah to her manager and express her concerns
2. Do nothing; it must be a one-off. Sarah isn't doing any dangerous work this morning and the effects will have worn off by the time she does later in the day
3. Speak to Sarah

In this case, if Jackie is not the line manager, she should report it to Sarah's manager. They should then speak to Sarah, assess the situation and may decide to send Sarah for a 'For Cause' Alcohol Test. The manager will need to go with her, especially if Sarah needs to travel to the test centre, and the manager will need to decide what action to carry out afterwards depending on the result of the test and with advice from Occupational Health and possibly HR.



## Working with Integrity

### Bribery and corruption

**It is not only illegal, but unethical, to offer or accept improper payments such as bribes and kickbacks in order to gain or retain business or an advantage. AWE has a zero tolerance approach to bribery and corruption and upholds all laws relating to it.**

No-one should ever give or take a bribe. This includes facilitation payments which are payments to induce officials to perform routine functions which they are otherwise obliged to perform. Giving or accepting a bribe could result in a substantial fine for the company and reputational damage, and penalties for individuals including fines and imprisonment. This is why it is important to know and understand the rules about giving and receiving gifts, hospitality or entertainment which could constitute bribery if not given or received in accordance with the company policy.

### Dilemma

Jack is working with a new equipment supplier. Jack has been told that it will make shipping of a vital piece of equipment easier if he makes a payment to customs officials in the country of origin to get the equipment cleared through customs. The piece of equipment is needed as soon as possible.

### What should Jack do?

1. Make the payment so that we can get the equipment quickly
2. Report this to his line manager
3. Negotiate with the supplier to reduce the payment having accepted the supplier's assertions that this is normal in the country of origin and if we want to continue to receive equipment from there we will need to make this payment

Bribes are never acceptable, and we must never make payments to government officials as these can be considered to be forms of bribery. This is illegal in many countries and Jack may be landing himself and AWE in trouble if he goes through with this. Jack should speak to his line manager and the legal department about the best way to ensure the equipment is shipped. He should also speak to his line manager who can make appropriate decisions about the future working relationship with the supplier.

## Fraud

**If you deceive someone by misrepresenting or dishonestly reporting facts to gain an advantage, it is fraud. It is also fraud if you get someone else to do it. Fraud is usually carried out for gain and is a very serious crime.**

Money laundering and tax evasion are also a concern. Money laundering involves trying to “launder” the proceeds of criminal activity such as terrorism, drug trafficking or fraud into legitimate funds or assets. Tax evasion is fraud which deprives HM Revenue and Customs of money it is entitled to. Fraud can also occur if someone books more annual leave than they are entitled to, books more hours on their timecard than they have worked, claims overtime which they have not worked, spends work time doing personal tasks or claiming incorrectly for business travel. Mis-booking time may lead to over-invoicing customers which would be a reputational issue for AWE. Even if an employee does not gain financially from mis-booking it is still not a victimless crime.

## Dilemma

Jane is contracted to work 74 hours over a nine-day fortnight. She normally drops her young daughter off with her mother in the morning and starts work at 8.00am. However, a month ago her mother became ill and said she couldn't look after Jane's daughter until she felt better. Jane's friend has been helping her out but Jane can't drop her daughter off as early and so has been arriving at work at 9.00am. Jane has been working nine hours less than her contracted hours per fortnight but has still been completing 74 hours on her timecard. She thinks she will make up the hours when her mother is better but will still only record 74 on her timecard making it alright.

## What should Jane's manager do?

1. Speak to Jane about it to find out what is going on and then consult HR and consider whether formal disciplinary action for fraud is appropriate
2. She should talk to Jane about a temporary reduction in her hours until her mother is better
3. Ignore it. Jane is a good employee who has issues at home and she is right, it will probably all even out in time

This is fraud. Jane's manager needs to speak to Jane and then to HR. It is likely HR will launch a formal management investigation. If Jane's actions are found to be fraudulent, she could be dismissed.

## Gifts and hospitality

**Exchanging gifts and hospitality can build goodwill and business relationships but if it is not done carefully, it can look like a bribe. It is acceptable and common practice for gifts, hospitality and entertainment to be given and received in the course of normal business but no-one should accept anything that might reasonably be believed to influence commercial activity or decision-making processes.**

Invitations to corporate hospitality events may be accepted subject to certain considerations such as:

- The level of hospitality offered
- The way in which it is being provided
- The level of influence the person receiving the invitation has on business decisions
- The frequency of such invitations

It is important that gifts and hospitality should be of nominal value and not exceed £50. All offers, whether made by us or to us, and whether accepted or rejected, and whatever the value unless it truly is a nominal gift such as a pen or a lunch eaten during the normal course of a business event, must be registered on the Hospitality Capture Tool on portal.

Further information can be found in the Gifts, Hospitality and Entertainment Policy on portal.

## Dilemma

Zaid is working with some colleagues to choose a supplier to provide a new business system. Zaid has a good relationship with the Managing Director of one of the suppliers who is tendering for the contract, having worked with him before at a previous company. The MD offers Zaid two tickets to a major sporting event. Zaid is thrilled.

## What should Zaid do?

1. Accept the tickets and take a work colleague so that he can say it wasn't a personal gift
2. Refuse the tickets and explain he cannot accept them due to company policy
3. Accept the tickets and offer them as a raffle prize for a raffle he organises for his work colleagues

Zaid should refuse the tickets. He should register both the offer and his refusal on the Hospitality Register. He should not accept the tickets, even if he took a friend to the game, as it could look like a bribe. This is especially important in this case where the supplier is tendering for a contract. The policy states that no gifts, hospitality or entertainment should be given or received during a tender process or in the six months leading up to it. The tickets should also not be accepted and raffled. This would contravene the company policy, because it would not be fair if the raffle was limited to a small group of people and may give the supplier the idea that AWE is a company where employees accept gifts and could be bribed in future.

## Conflicts of interest

**Conflicts of interest can arise when personal interests compete with AWE's interests and impact our ability to make objective decisions.**

No-one should use their influence, position or company information, assets or resources in any way that may result in AWE giving a competitive advantage to an individual, relative or friend at the expense of others.

Conflicts can arise if employees take on second jobs, do voluntary work, or where a relative or close friend works for AWE or a supplier competing for AWE Business.

## Dilemma

Jamie is an engineer and the technical advisor on an AWE evaluation of the supplier bids for a major contract. During the supplier presentations one of the representatives from a bidder is led by Jordan, an old friend. Later when Jamie provides feedback on the results he decides Jordan's company were the best.

## What should Jamie do?

1. Give Jordan the contract because it is irrelevant that she is an old friend
2. Talk to his line manager and consider his role in the decision-making process
3. Not give Jordan the contract as it compromises his integrity

There is a conflict of interest here and, even if Jordan's bid is best, Jamie could be seen to be influenced by their old friendship. It risks the tender being seen as unfair by colleagues and other suppliers. Jamie should have removed himself from the process when Jordan arrived, or at least declared the conflict immediately. He should talk to his line manager about how to make sure the process and the company are not compromised, and to ensure the right decision can be taken for all parties concerned.

## Valuing People

### Bullying and harassment

**AWE, and all its workers, must not tolerate bullying and harassment.**

Typical characteristics of bullying and harassment are:

- behaviour that creates an intimidating, humiliating or offensive environment for someone
- behaviour that is malicious or insulting
- an abuse or misuse of power
- physical violence
- ignoring someone
- offensive language or banter which becomes offensive

If anything like this is experienced or witnessed it must be reported so that it can be investigated and appropriate action taken.

### Dilemma

Rory overhears Jim being teased about his ginger hair by two of his colleagues, Bill and Susan. Jim laughs along but when Rory looks at him after they've left, he looks fed up. Rory decides to ask him if he is OK and Jim says that when Bill and Susan first made their comments, he thought it was funny. He went along with it as he wanted to fit in and be accepted into the team, but he said that the joke has worn thin and he is now becoming offended by their comments. He wants to say something but isn't sure how to without Bill and Susan using that against him and making a joke out of the fact he doesn't find their comments funny.

### What should Rory do?

1. Encourage Jim to report it to his manager and go to see his manager with him if he wants support
2. Help Jim work out what he will say to Bill and Susan and try to be there when he broaches the subject
3. Speak to Bill and Susan himself and explain how it's making Jim feel, and keep an eye on Jim to make sure it has stopped

Rory could do any of these. He should consider the facts of the particular case and situation, for example, how well he knows Jim, how well he knows Bill and Susan, or who he would most likely be able to influence. He could also suggest Jim report it using one of the company's various Serious Concerns' reporting routes, or raise it himself through one of these channels. What he should not do is ignore the situation as things will only feel worse for Jim and may cause him to consider resigning, change teams or make him ill.

## Discrimination

**Any form of discrimination is unacceptable. This may be discrimination based on gender, race, nationality, religion or belief, age, disability, marital status, gender reassignment, sexual orientation, pregnancy or maternity leave, union membership or political affiliation, marriage or civil partnership.**

AWE values diversity and will not tolerate any form of discrimination or exclusion. Each person is entitled to the same opportunities for employment and promotion based on their skills, qualifications, knowledge and experience. However, discrimination can also occur, or be perceived to occur, when a person is excluded in the workplace, for example, if colleagues do not include the person in office conversations, or by not inviting them to social activities when everyone else is invited. Everyone should be treated fairly and equally.

## Dilemma

Suzanne manages a team where the five team members are all over 50 and have worked for the company for a long time. She has a vacancy and Nick is one of the applicants. She knows Nick as he already works for the company and thinks he is in his 20's. Suzanne plans to interview Nick along with three other candidates who she surmises are all much older than Nick. Suzanne is concerned that if she appoints Nick he won't fit in or understand the culture in the office because he is too young for her team.

## What should Suzanne do?

1. She could speak to a colleague, peer or other manager who may have experienced a similar situation, or read the company guidance, in order to allay any concerns she may have
2. She should devise a range of interview questions to cover his concerns
3. She shouldn't interview Nick

Discrimination in any form is not tolerated and it would amount to age discrimination if Suzanne were to ask any questions about this or express any concerns. If Nick is the best person for the job he should be appointed. Suzanne needs to address the team culture if she fears the team would exclude Nick on the grounds of age when he can bring new thoughts and practices to their work and increase the diversity of thinking. Suzanne should speak to her manager or colleagues for advice.

## Fair treatment

**Everyone wants to work in a place we all trust and where everyone's talents are recognised and given the best chance to flourish.**

We should ensure that we treat each other fairly and equally. This includes making sure that company policies are applied to employees in a consistent fashion, including decisions about performance management or pay on promotion because we employ, promote and reward people based on their talent and merit.

## Dilemma

Two employees Sam and Charlie start work for the same manager, Chris, on the same day. They are of similar age with similar skills, qualifications and experience. Sam is pregnant. Chris spent a long time trying to decide what salary to offer. He considered the fact that Sam would not be at work for up to a year not long after starting. He also considered the fact that he did not have many women in his team and wanted to promote diversity. He also considered that if he paid them the same, Sam would be getting a greater percentage pay increase from her old job compared to Charlie.

## What should Chris do?

1. Offer Sam more money
2. Offer Charlie more money
3. Offer them the same money

Chris should pay them the same on starting. The fact that Charlie earned more in his previous role should not be considered other than to ensure he is offered an increase in pay which he would find attractive and which would encourage him to come to AWE. This is an opportunity to close the gender pay gap. Sam should not be offered an increased salary on the grounds of supporting diversity. Positive discrimination is unlawful and it would be as wrong to offer Sam a higher salary when the other factors about skills, experience and qualifications are so similar. Finally, it would be wrong to offer Sam less money because she is pregnant. This would be unlawful and discriminatory and the fact Sam will take some time off on maternity leave should be disregarded when considering the starting salary.

## Diversity and inclusion

**AWE embraces diversity and inclusion. The company promotes an inclusive culture and respects difference.**

Our success, now and in the future, depends on the company accessing a diversity of talent and enabling a range of different thoughts and views to be expressed. We aim to provide equal opportunities to all our employees and welcome applicants from all backgrounds.

## Dilemma

John sees that Ramesh is never offered a cup of tea when his colleagues go to make a round. He also notices that Ramesh always offers to make tea for his colleagues but they always refuse. John feels uncomfortable and feels Ramesh is being discriminated against.

## What should John do?

1. Ignore it. If Ramesh was bothered he would have raised it by now
2. Speak to Ramesh and explain how he feels. He should explain to Ramesh that Ramesh needs to raise this with his line manager, or explain that if Ramesh is not happy about doing that, John will speak to him instead
3. Speak to the colleagues and tell them that he feels their behaviour could amount to discrimination and feels it is unethical

John should speak to Ramesh first and try to persuade Ramesh that he should raise a concern, initially with his line manager. However, Ramesh may not want to do this – he may feel he will be excluded more if he raises it, or be worried he would become the target of his colleagues' jokes. However, this behaviour is not acceptable and the fact Ramesh fears things will get worse makes this of even greater concern. John should raise this if Ramesh doesn't want to, explain to Ramesh that he will do this but he will ensure Ramesh's manager is clear that it's not Ramesh who has raised this. His line manager should speak to the colleagues individually to find out what's going on and may need to raise it to HR for a formal management investigation. The fear Ramesh has of on-going retaliation should also be of great concern to his line manager when considering what action to take.

## Customer Relations

### Supplier relationships

**Individuals buying goods or services for AWE or those involved in the procurement process must treat all suppliers consistently and fairly.**

In deciding among competing suppliers, colleagues should objectively and impartially weigh up all the facts and avoid any favouritism.

### Dilemma

Robert is involved in the competitive process to select a new supplier. There are three competing companies. Robert is good friends with the Account Manager of one of them. This company owns some small, exclusive hostels and spas and Robert's friend has asked Robert if he and his partner would like to go away for a short break with him and his wife to one of these, all expenses paid.

### What should Robert do?

1. He should accept. His friend is making the offer as a friend
2. He should accept but pay for his visit himself
3. He should decline

Robert should decline. The company is taking part in the tendering process and to accept might look like they were attempting to influence the outcome. Even if Robert went away for the weekend and paid for himself, the perception of any of the other competitors may be that it had been a free trip and that his judgement had been influenced by this. Robert should also declare his interest and pull out from any element of decision-making in this process, or any other involving the company his friend works for. If he hasn't already, he must complete a Conflict of Interest form to declare the conflict and explain how it will be mitigated so that everything is known and above board. Robert should also register the offer of the free holiday on the Hospitality Register even though he has declined it.

## Modern slavery and human trafficking

**Every person has basic rights to be treated with respect and dignity. What happens at work can have a positive or negative effect on these rights and we must seek to respect and protect them.**

This includes not working with anyone who we know is abusing these rights, treating workers unfairly in terms of their pay and conditions, including their working environment as well as other basic employment provisions such as paid time off for leave and sickness.

## Dilemma

Carl works in Supply Chain Management. He is involved in a tendering exercise. One of the companies that has put in a tender has branches in some Asian countries. He has heard rumours that the workers there may not be paid well and may have to work long hours in dirty conditions. AWE would not be dealing with those branches, but he is still bothered by this.

## What should Carl do?

1. Carl should ignore the issue. After all, AWE won't be dealing with those branches
2. Carl should raise his concerns to his line manager
3. Carl should contact the MD of the company direct to ask him some questions

Carl should speak to his line manager and report whatever information he has relating to the alleged issues. The line manager can then make enquiries to establish whether there is a genuine cause for concern. Once the line manager has a better understanding of the situation they may either: thank Carl for raising his concerns and confirming that AWE are fully satisfied that the pay and working conditions of the Company are not a cause for concern, or that following further enquiries the company was unable to provide satisfactory answers and AWE has taken the decision not to contract with the Company. Where necessary, AWE may also report offending companies to the appropriate authorities.

## Protection of Assets and Data

### Handling personal information

**AWE respects everyone's right to keep their personal data private and will only hold personal data that it is legally entitled to hold. Control or processing of personal data will only be carried out in accordance with our policies and the requirements of the GDPR, Data Protection Act 2018.**

Personal data is any information that relates to an individual or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.

Personal Information is broad reaching. It could be as simple as a name, address, telephone number or an ID number, IP address, cookie identifier, date of birth, salary or opinions about someone. It can also be information contained in call recordings, CCTV and CACS data. There is no definitive list provided by GDPR. The question to be considered is, can you identify a living person from some or all of the factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person?

Context is everything. Organisations collect many different types of information on people. Even if one piece of information does not individuate someone, it could become relevant alongside other data.

Under the GDPR there is a special category of data which has more stringent privacy rules. This includes data that reveals a data subject's: racial or ethnic origin, political opinion, religious and philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health and sex life and sexual orientation.

AWE also handles personal data about our customers and stakeholders and we process and protect this data in the same way.

### Dilemma

Joe is Gavin's friend. Joe has been off work, sick, for two days. He was due to play football in a match later in the week. It would be his first game for the work football team. Dean is the team manager and is also friendly with Gavin. He knows Gavin knows Joe and asks Gavin to give him Joe's phone number so he can phone Joe and find out if he will be well enough to play in the match.

### What should Gavin do?

1. Call Joe and ask him to call Dean
2. Give Dean Joe's number
3. Call Joe and ask if he minds if he gives Dean his number

Gavin should call Joe and give him the option of contacting Dean or giving his permission for Gavin to pass on his number. This is personal data so Gavin should be wary of releasing it until he has spoken to Joe. He should not automatically presume that because it is about the football match which Gavin knows Joe wants to play in, Joe would be OK with Gavin sharing his personal details.

## Using assets responsibly

**Company assets include time, physical and intellectual property and should be used for business purposes only. Everyone is trusted not to abuse the assets of the business as they are there to support us in achieving our business objectives and give us the necessary tools to do our jobs.**

Everyone is responsible for assets or equipment that we use to make sure they are not damaged, misused, lost or stolen. Electronic assets must not be used to download or access inappropriate material and the Acceptable Use of IT Policy must be complied with. Incidental or occasional use of e-mail, the telephone or the internet for private use may be acceptable provided it does not prevent you performing your job or add cost to AWE.

## Dilemma

Seema had taken her laptop home with her to do some work. On the way home she stopped at the supermarket and while she was shopping, her car was broken into and the laptop stolen. She had left it on the back seat, although it was in its bag, but fortunately she had shut it down. Seema had reported this to the police.

## What should Seema do?

1. Seema should call her manager immediately to report it, giving him all the facts, and ask who else she needs to tell
2. She should ignore it and report it when she returns to work on Monday hoping that the police recover it in the meantime
3. She should report it, but tell her manager it was stolen from her home where she had hidden it so it wasn't obvious to thieves

Seema should phone her manager immediately to report it and be truthful over what happened. Fortunately she had shut her computer down. As the laptop has BitLocker and she did not keep the password with it, it is well encrypted and the information on it is therefore secure. Her manager should advise her to call IT who can then give her advice and reassurance about what to do next.

## Maintaining documents and records

**Accurate and reliable information is crucial to the running of any business. When we prepare and submit business or financial records they must be accurate and up-to-date.**

Whenever we are audited, we must provide all the necessary information, willingly to the auditors. Any misrepresentation of our records, data or accounts must be raised immediately. Proprietary or confidential information must not be included in any public disclosures unless the proper prior approval has been gained.

When we submit our own expenses and travel claims we must demonstrate integrity and trust and submit claims in line with the policy.

All documents must have an appropriate company classification in accordance with the company's Security Operating Procedures (SyOps).

## Dilemma

Peter travels from his home to a meeting at a client's office once a month. His normal journey to work is 10 miles and his journey to the client is 12 miles. He is aware of the company policy that he should subtract his normal home to work journey from his travel claims, but he thinks claiming two miles for the journey there is pointless so he claims all 12 miles. Jenny, a member of the expenses team who lives near Peter notices this. She knows how long his journey is to work, and she checks how far it is from his home to the client and realises he is claiming in contravention of the company's policy.

## What should Jenny do?

1. Ignore it
2. Report it to her line manager
3. Mention it "off-the-record" to Peter to advise him to amend his behaviour before someone else notices

Jenny should report this to her line manager. It appears to be a clear breach of company policy. It also amounts to fraud. Jenny's line manager should report this to HR for further investigation.

## Social media abuse

**Everyone should be mindful of what they say online and recognise that communications can affect AWE, its ability to do business and its reputation and can have an impact on individuals as well.**

All views expressed on social media must clearly be personal and not represent the views of AWE. Before you post a comment or an image, here are five points to consider:

1. Does it have any relation to your work?
2. Could it be contrary to AWE's behaviours?
3. Is it clear that you are speaking in your own capacity and not on behalf of AWE?
4. Would you be happy to share this with your boss or colleagues in person?
5. Could sharing this have negative consequences for you or the company in the future?

## Dilemma

Leigh's colleague, Andrew, posts some negative comments on Facebook about a decision his line manager has made which he does not agree with. It is about a security issue and Andrew is obviously frustrated and angry, making remarks that are increasingly disparaging about his manager and AWE.

## What should Leigh do?

1. Nothing as it does not concern her
2. Talk to Andrew and suggest that if he has a problem he should deal with it internally
3. Report it to her line manager

In this circumstance the third option would be the correct response. Andrew is saying negative things about the company publicly and this is not appropriate. Leigh can also talk to him, but she still needs to report it. Misuse of social media is a serious issue and must be dealt with.

## Responsible Organisation

### Environment

**How we treat the environment is a reflection on our company. We take our responsibility for the environment seriously and are committed to managing and minimising our environmental impact and our use of energy and resources.**

Our vision is to become a carbon neutral organisation by 2030 and we have set very challenging targets to ensure that we reduce our carbon emissions and contribute to the fight against climate change. To help AWE meet our aspiration, we must all consider the environmental impacts of our work and we must challenge unsustainable behaviour by ourselves and others, supporting all environmental initiatives which minimise our impact, such as recycling, sustainable travel and reducing water and energy consumption. We must also procure sustainable materials and work with others to ensure they operate in a way that reflects our environmental values.

AWE is committed to enhancing our sites' biodiversity and has adopted Biodiversity Net Gain as a way of addressing the biodiversity losses that can occur during the development process. It is all about leaving

the environment in a better place following development. Go for a walk during your lunch break and enjoy the wildlife. Take measures to protect wildlife and report any acts that you think might be detrimental to the environment.

### Dilemma

Martin works in HR. He walks past a waste store and notices a leaking drum. He is unsure of what it is leaking to the ground and he notices there are a number of drains in close proximity. He is unsure whether the material is dangerous to the environment or not.

### What should Martin do?

1. Ignore the issue - it's not his problem and someone else will be dealing with it
2. Report it to his manager and make sure his concerns are taken seriously and appropriate action taken
3. Call the greenline or waste services desk (SCRAP) for advice and report it as an event on ITRAC

Martin could do either option two or three, but he should take some action and speaking to his manager may ensure the appropriate action is taken quickly and Martin's fears allayed. If he isn't sure of his facts, he can simply ask someone such as a colleague or contact the greenline. However, if he has a concern he should raise it.

## Community relations

**AWE's continued success depends on building strong and positive relationships with our local community. As a responsible business we actively encourage colleagues to become involved in community initiatives and we are committed to engaging in open and transparent communications with our stakeholders.**

We support community organisations and charities selected by our people. Over the years, our colleagues have raised thousands of pounds for charities and other local organisations.

As one of the largest STEM employers in the local area we also encourage our people to use their skills to support the future success of the local area. Our award-winning schools' outreach is a great example of this. We provide a wide range of support including inspirational talks, events, workshops and mentoring – all designed to inspire young people to pursue careers in science, technology, engineering and mathematics. Through the programme we engage with thousands of students from primary age right through to sixth form, across North Hampshire and West Berkshire.

We have an ongoing dialogue with our neighbours through our site stakeholder group, the Local Liaison Committee, which brings together 33 representatives from local authorities in Berkshire and Hampshire. Together, they represent around half a million residents who live in the boroughs and parishes around the AWE sites.

It provides an important platform for local people to gain a better understanding of AWE's activities and to raise questions through their elected representative on the Committee. It's also a great way for us to stay in touch with local opinions on topics of mutual interest.

## Dilemma

Denise works at AWE and she has been using her special leave to take part in the national STEM Ambassador programme which enables her to provide STEM support at her local primary school.

She has been helping run a STEM club for the children, working alongside the teaching staff. Due to staffing shortages the head teacher asks if Denise can take the lead in running the club. She explains that the school will have to close one of its other clubs if Denise doesn't take the lead for the science club as they don't have enough staff to have a teacher present at both.

## What should Denise do?

1. Agree – after all the children will be disappointed if the club closes
2. Politely decline – It is not her responsibility to manage the club and this would not be in line with correct safeguarding procedures
3. Ask another colleague to help as they will be short-handed without the member of teaching staff

Denise has completed the STEM Ambassador training and the AWE safeguarding for children course and knows that there should always be a teacher present when staff are volunteering. She knows that this is best practice from the charity that runs the STEM Ambassador programme, STEM Learning. Denise should speak to the head teacher and explain that it's not possible for her to take the lead role. They should agree the two clubs can run alternate weeks until a staffing solution can be found. Denise should update her colleagues in Community Engagement, who run the schools outreach programme, and a reminder should be sent to all Ambassadors reminding them not to feel under pressure to lead activities when teachers are not able to be present.

## Reporting Concerns

**You can seek advice or report an issue on any subject that may pose an ethical concern by speaking to your line manager or a different, maybe senior manager.**

You may also speak to one of the company's Ethics Ambassadors. Alternatively, you can use one of the internal or external methods for raising concerns:

**What issues would constitute a grievance that I report to HR and what would be a serious concern that I should report to Ethics?**

A **grievance** is a complaint made by an individual about something that directly affects them. Issues that could cause grievances may include terms and conditions of employment, health and safety, work relations, bullying and harassment, new working practices, working environment, organisational change and discrimination.

The grievance procedure should not be used to complain about dismissal, disciplinary action or performance management. If you are dissatisfied

with any disciplinary or performance management action, you should submit an appeal under the appropriate procedure.

The grievance procedure does not apply to grievances concerning two or more employees (collective grievances) raised by a representative of the Trade Union. These will be dealt with under the collective grievance procedure with the trade unions.

AWE operates a **serious concern** procedure to enable employees to report illegal activities, wrongdoing or malpractice. However, where you are directly affected by the matter in question, or where you feel you have been victimised for an act of whistleblowing, you should raise the matter under the Grievance Procedure. A serious concern is an issue which may harm the legitimate interest of the organisation, its workforce, customers and wider society, for example potentially affecting the organisation's reputation or finances. It encompasses whistleblowing but may be more.

Examples of serious concerns include fraud, theft, bullying of a group of employees, conflicts of interest, misrepresenting facts, bribery, undue pressure put on a group of staff, health and safety issues, security issues, criminal offences, covering up wrong-doing, breaches of legislation or environmental concerns.

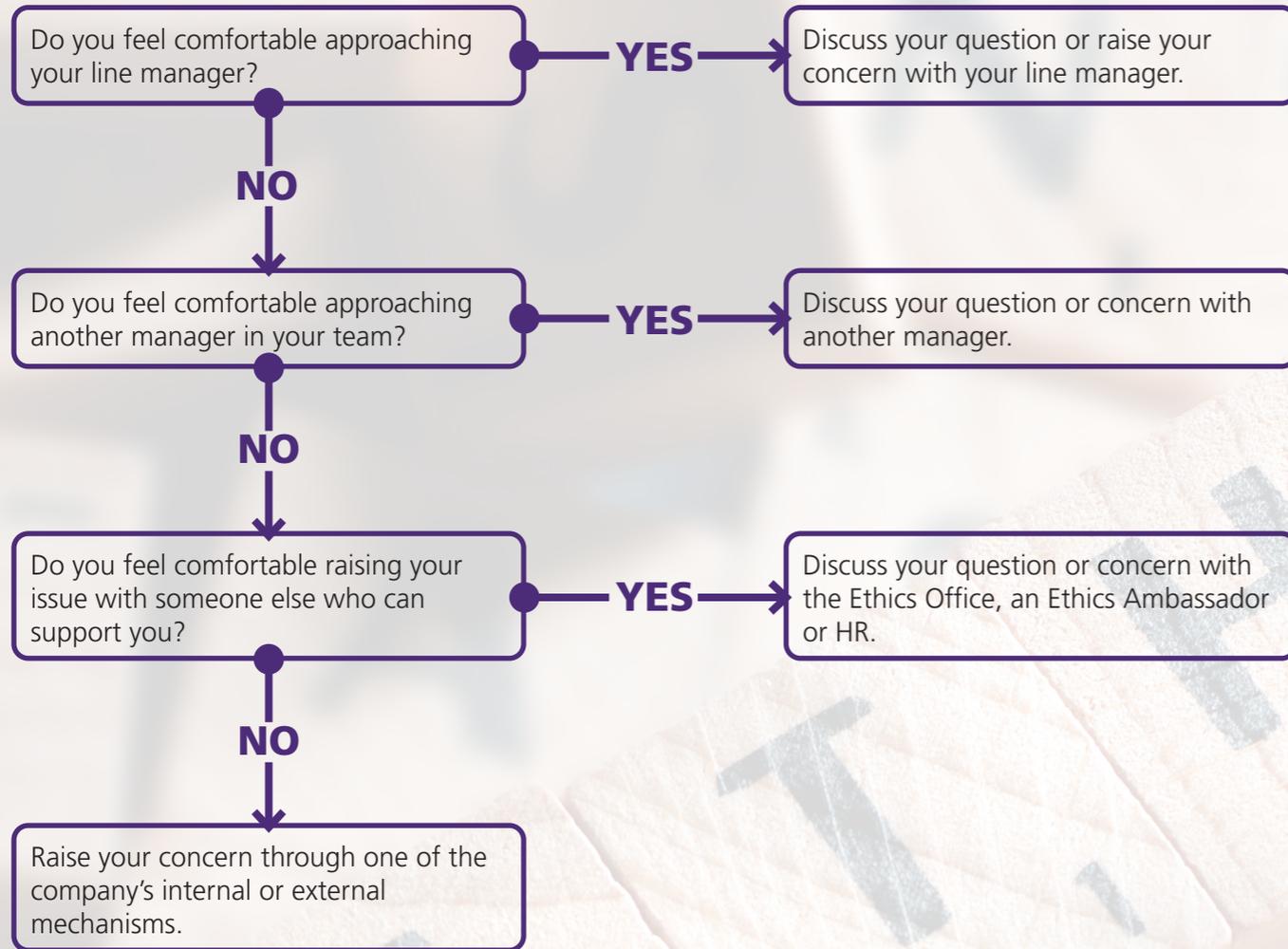
### Internally

Telephone extension 25758 or  
e-mail [SeriousConcerns@awe.co.uk](mailto:SeriousConcerns@awe.co.uk).

### Externally

Telephone AWE on 01189 825758 or  
contact our independent helpline provider,  
Safecall, on 0800 915 1571.

Concerns can be raised anonymously and all reports will be treated confidentially. All concerns will be investigated as far as it is reasonably practical and necessary to determine what has occurred. There will be no retribution for anyone raising a concern. However, where wrongdoing is identified as a result of an investigation, appropriate action will be taken.



The background of the page features a close-up, slightly blurred photograph of several wooden blocks. The blocks are arranged in a way that they spell out the word 'ETHICS' in large, dark grey letters. The lighting is soft, and the colors are warm, with the wood appearing in shades of light brown and tan. The blocks are positioned diagonally across the frame, creating a sense of depth and texture.

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