

# CNL Supplier Code of Conduct



*All employees, suppliers, consultants, contactors and vendors are expected to act with the highest level of integrity and ethical care.*



Canadian Nuclear  
Laboratories

Laboratoires Nucléaires  
Canadiens

**Accountability – Excellence – Integrity  
Respect – Safety – Teamwork**

# CNL Supplier Code of Conduct

## Introduction

**Canadian Nuclear Laboratories (CNL)** is committed to ensuring that Canadians and our clients across the world receive energy, health, and environmental benefits from nuclear science and technology. CNL is also committed to instill confidence that nuclear safety and security are assured and that all benefits are delivered with demonstrable integrity through all of CNL's business dealings.

The purpose of this Supplier Code of Conduct ("Code") is to establish a common understanding of the expectations of behaviour of all of CNL's contractors, consultants and suppliers ("Suppliers").

All of CNL's Suppliers are required to take responsibility for their own conduct and for those who work on their behalf (sub-contractors, sub-consultants and other sub-suppliers) on CNL projects. This Code applies wherever CNL business may be conducted, worldwide. The Code is not intended to supplant express contractual obligations

The Code does not attempt to provide a detailed and exhaustive list of what to do in every aspect of work with CNL. Instead, it represents a broad framework that will help guide Suppliers when ethical issues arise.

When in doubt, Suppliers should consider the following questions:

- Are our proposed actions fair, transparent, lawful, and ethical?
- Are those actions permitted under this Code?
- Are we authorized to take those actions within our relationship with CNL?
- Would we want to see those actions reported in the media?

Adherence to the expectations set out in this Code is mandatory for all CNL Suppliers

## Our Core Values

CNL conducts all business in accordance with our Core Values. The Core Values point to what is important in our organization, stand as pillars to guide our behavior and decision making, and aim organizational conduct in a direction that results in success. The Core Values inform our expectations of our Suppliers.

## Accountability

Accountability is both an attitude and a set of actions that affect how we impact people, situations and results in a positive way.

## Excellence

Excellence is striving to achieve an ever-rising standard of quality through continual improvement and innovation.

## Integrity

Integrity is adhering to high ethical standards and strong moral principles, even under pressure.

## Respect

Respect is placing a high value on others, treating them fairly, and empathizing with their needs.

## Safety

Safety is freedom from harm, danger, injury or loss to people and the environment. It is the foundation on which our decision-making stands. It is our primary focus, with no compromise.

## Teamwork

Teamwork is the ability to work together, in a collaborative way, toward a common goal.

## Expectations of CNL Suppliers

### Compliance with the Law

All CNL Suppliers are required to comply with all applicable federal, provincial, and local laws, statutes, rules, and regulations, including in jurisdictions where a Supplier is involved in CNL's work or operations.

### Human Rights and Employment Practices

We require all of our Suppliers to act in a respectful manner when dealing with everyone they come in contact with in the course of delivering CNL's business.

CNL requires all Suppliers to be able to demonstrate that, in their workplace, they:

- comply with all applicable health and safety laws, statutes and regulations and operate a safe and healthy work environment for their workers and all with whom they come into contact;
- do not use child labour or forced labour;
- do not tolerate discrimination, harassment and workplace violence;
- ensure employees are free to raise concerns without fear of reprisal; and
- have respect for the rights of workers to associate and bargain collectively.

## Anti-bribery & Corruption

At CNL, we abide by the Canadian Corruption of Foreign Public Officials Act as well as all other international and national laws that apply to our business operations internationally.

None of our Suppliers, nor those working on their behalf, shall engage in any form of corruption, extortion and/or embezzlement. This applies regardless of whether the intended recipient is a public official, a private individual or another company.

## Gifts, Entertainment or Other Benefits

Suppliers must never offer, request, give, accept or receive any gift, gratuity, entertainment, hospitality, or other benefit that may compromise or appear to compromise the good judgment or ability of a CNL employee or anyone working on CNL's behalf, to make business decisions in the best interests of CNL.

## Anti-Competitive Behavior

CNL believes in, and is obliged to compete fairly and transparently and makes no attempt to limit or restrict trade or engage in unfair or discriminatory trade practices. We comply with all laws regarding fair competition, including the Canadian Competition Act, and we require all of our Suppliers to do the same.

## Confidentiality

### Personal Information

CNL respects the privacy of employees, business partners, and clients who share their personal information with us. We are committed to respecting and upholding the principles set out in the Personal Information Protection and Electronic Documents Act (PIPEDA), which provides for the protection of personal information shared with CNL by Suppliers, our clients and by any third parties. We expect our Supplier to share this commitment.

### Sensitive Information

We expect all CNL Suppliers to protect any sensitive information against theft, loss, destruction, unauthorized access/release, or misuse. Sensitive information includes information that is proprietary, technical, business, financial, personal, or requires confidentiality, and regardless of whether it is received from CNL, our clients or from any other source.

Suppliers must not disclose CNL sensitive information to anyone outside CNL, without prior and express written approval. Suppliers must not use CNL sensitive information for any improper purpose. This applies even after the Supplier's contract is complete and extends to their employees after they leave the Supplier's employment.

## Conflicts of Interest

CNL expects our Suppliers and their workers to be keenly aware of organizational and personal conflicts of interest that may impact upon their work for CNL and/or our clients.

**Organizational conflicts of interest** can arise from Supplier prior, current or proposed relationships with CNL clients or other CNL suppliers or contractors.

**Personal conflicts of interest** can arise through the existence of close family, friendship or financial relationships between a Supplier's employee and CNL's client, competitors or other current or proposed CNL suppliers or contractors.

The use of such relationships for improper personal or organizational advantage could cause serious commercial and reputational damage for CNL, the Supplier and CNL's client, and must be avoided.

However, it is not only the use of such a relationship for improper purposes that can cause damage. The mere existence of a relationship can create a perception of a conflict of interest that could still cause commercial and reputational damage, even if not used improperly, unless the relationship is disclosed and managed appropriately.

A CNL Supplier is required to:

- take all reasonable steps to identify conflicts of interest in its business and where relevant, in its supply chain; and
- disclose any identified conflict of interest without delay.

CNL is also sensitive to the appearance of conflicts and apparent conflicts created by CNL engaging as contractors or subcontracts its own affiliates, including parent companies of CNL's shareholder, Canadian Nuclear Energy Alliance (CNEA).

While these entities remain part of CNL's supplier pool, CNL is committed to a fair and transparent procurement process and will carefully manage any potential conflicts. CNL asks that any suppliers intending to partner with or subcontract a material portion of any work it performs to one of the CNEA affiliates; Fluor Corporation Inc., Atkins, CH2M Hill Companies Ltd., SNC-Lavalin Group Inc., Jacobs' Engineering Group Inc. and their affiliated entities (found at [http://www.cnl.ca/en/home/vendor\\_portal/](http://www.cnl.ca/en/home/vendor_portal/)) notify CNL in advance so that CNL can address and manage any conflict issues before they arise.

## Compliance with Trade & Export Controls

CNL complies with all international trade laws and regulations, including trade sanctions, and we expect our Suppliers to comply with all trade and export control laws that apply to their work.

Be aware that export and import laws apply not only to goods but also to technology, software and technical information. Export laws may be violated by simply sharing information with

foreign nationals without the information ever leaving its country of origin. When working with CNL our Suppliers must be careful to avoid such “deemed export” breaches and have procedures in place to recognize and avoid them.

## Record Keeping / Audit

Best practices require that our Suppliers keep appropriate records in order to demonstrate their compliance with this Supplier Code of Conduct. Falsifying financial or business records or making false statements is against the law and will irreparably damage any business relationship with CNL. Suppliers must cooperate with any appropriate audit and also with any investigation into a violation or suspected violation of this Supplier Code of Conduct.

## Communication and Awareness Training

To ensure compliance with this Code, our Suppliers should communicate its content (or the Supplier’s equivalent code of conduct) to all employees, sub-contractors contractors or other workers that are intended to work on CNL projects.

## Reporting Concerns Without Retaliation

All CNL Suppliers are obliged to report any actual, potential, or perceived conflict of interest. CNL Suppliers are also obligated to report credible suspicions they have about possible violations of this Code or relevant laws or regulations, as they relate to their work with CNL.

Suppliers, their employees and any associated workers should feel free to report any suspected violation of the law or our Supplier Code of Conduct without fear of retaliation.

We expect our Suppliers also to take steps to prevent any retaliation against any of their employees or any third party for reporting a possible violation of laws and this Code in good faith.

We will make every effort to safeguard the confidentiality and, wherever allowed by law, the anonymity of the individual making the report, if so desired.

Any concerns or questions regarding compliance with this Code should be reported without delay to CNL’s Ethics & Business Conduct Office using either of the following methods:

- Making a direct report to CNL’s Manager, Ethics & Business Conduct, by telephone at 613-584-3311 ext. 44944, or by email at [cnlethicsbusinessconduct@cnl.ca](mailto:cnlethicsbusinessconduct@cnl.ca); OR
- Making an anonymous report using the CNL Disclosures Hotline, online at [www.clearviewconnects.com](http://www.clearviewconnects.com), or by toll free telephone at 1-866-505-9912.