

# **BUSINESS CODE OF ETHICS**

## Purpose

This Code provides high-level help and guidance on how to conduct business in the name of Thomas Thor by setting out the Company's ethical position in a number of key areas. It applies to our employees, interns, contractors and suppliers: we will not do business with people or organisations that do not operate in accordance with our ethical values.

## Your role

The Company recognises that its people are its most important assets and believes that a strong Code of Ethics will help us all to work together to a high ethical standard.

Each of us can help the Company to achieve its aims by ensuring that we conduct our business in accordance with this Code.

To ensure the continuing development of this Code, the Company needs to hear your views on how the Code can be improved, so please give us your feedback at **feedback@thomas-thor.com**. The Code has been discussed and approved by the CEO and the Board who will review it regularly to ensure it remains relevant and up to date.

## The Company's role

The Company will support ethical work and will create the conditions, policies and systems to enable its people to work ethically.



## Our Code of Ethics

### Thomas Thor Vision and Mission

We are all committed to delivering Vision and Mission in accordance with our Code of Ethics.

## Our Vision

To enable the acceleration of Net Zero through the mobilization of knowledge and talent.

## We believe

In supporting a clean energy future and in the power of human ingenuity to create a better world.

## Our Mission

To build and sustain the global nuclear workforce

## Our Values

We have Company Values which we apply every day:

- Inclusive Partnership
- Credibility
- Agility

## Inclusion

The perspectives, needs and input of all members of our team are important and we strive to create an environment where everyone has a sense of belonging and inclusion. Please refer to our ED&I policy for more detail.

## Where we work

We are open to opportunities all over the world, but we do not support or work for people, organisations or countries that are subject to international sanctions or other restrictions imposed by states in which we currently work (e.g. the US). If you are ever in doubt about whether we should work for a client, please contact our CFO: **[j.homan@thomas-thor.com](mailto:j.homan@thomas-thor.com)** for guidance.

## Modern Slavery/Child Labour

Thomas Thor has zero tolerance for child labour, forced labour, and trafficking in persons and will not support or be associated with any person or organisation involved in these activities.

## Lawfulness

We always act within the law of the countries in which we work. This includes labour, tax and social security laws.

## Integrity, transparency and fairness

We work honestly and transparently with our colleagues, clients, candidates and suppliers and strive for fair, win-win relationships. We care about how we conduct business and apply the principles of behaviour set out in our Global Handbook.

## Bribery and Corruption

We do not give or accept any form of bribe or payment in kind to gain unfair advantage.

## Gifts and hospitality

Any gifts or entertainments offered, given or received must not be capable of influencing the correct performance of a person's duties. We do not accept gifts from agencies or discounts not disclosed to clients.<sup>6</sup>

## Data and confidentiality

We protect the personal information we hold and strictly observe all the standards that apply wherever we are working in the world. We always keep our client's commercial information confidential.

## Security

We are committed to maintaining and improving the security, confidentiality and integrity of our business systems and processes to keep pace with evolving threats, such as cyber- attack.

## Health and safety

We maintain safe and healthy working environments and ensure that our candidates are placed in safe, well-managed workplaces in accordance with our Health and Safety policy.

## Environment

We are committed to the reduction of the environmental impact of our business in terms of waste production, energy use and carbon footprint.



## Unethical behaviour

If any of us witness or become aware of unethical behaviour we should report it immediately.

Your line manager, HR and your Director/Vice President are all possible sources of help when reporting unethical behaviour. If you are not sure who you should report unethical behaviour to, contact our HR manager: **hr@thomas-thor.com**. All such reports are held in strict confidence and are protected by our Whistleblowing Policy.