

Sandia National Laboratories

CODE OF ETHICS AND STANDARDS OF CONDUCT

May 2019



Sandia National Laboratories

An Equal Opportunity Employer operated by National Technology & Engineering Solutions of Sandia, LLC, a wholly owned subsidiary of Honeywell International Inc.



a message from
**STEVE
YOUNGER**

Colleagues:

Sandia plays a central role in America's defense, from certifying the nuclear weapons stockpile to assessing threats to developing advanced technologies that change lives and ensure global peace.

Achieving our mission requires adherence to the highest standards of professional ethics and integrity. Constant attention to these standards earns and maintains the trust of our customers – they can rely on our assessments and our products.

Sandia's Code of Ethics and Standards of Conduct includes expectations and requirements for employees, the Board of Managers, and others who act on behalf of the Laboratories. Annual Awareness Training includes reading and acknowledging your understanding of this document.

If you have any questions regarding your ethics responsibilities, talk with your manager, Human Resources Business Partner, or the Ethics/EEO Advisory and Investigative Services staff. You can also call the Ethics/EEO helpline at 505-845-9900 for advice or anonymous reporting.

Thank you for your commitment to maintaining the highest level of professional conduct and integrity as part of Sandia's "exceptional service in the national interest."

A handwritten signature in black ink, appearing to read 'Steve Younger', with a long horizontal line extending to the right.

Steve

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a CULTURE of INTEGRITY

Sandia National Laboratories (Sandia)* is committed to dealing honestly and fairly with our employees, customers, contractors, and the communities in which we live and work. Our success depends on maintaining a culture of integrity.

We take this responsibility seriously, and every employee is expected to abide by the principles outlined in this Code of Conduct. Failure to do so could result in disciplinary action up to and including termination.

*National Technology and Engineering Solutions of Sandia, LLC (NTESS) manages and operates Sandia National Laboratories

OUR PURPOSE, OUR VALUES, OUR BEHAVIORS, and OUR ACCOUNTABILITY

Sandia holds all leaders, employees, and members of the Board of Managers accountable for upholding our purpose, our values, our behaviors and this Code of Ethics and Standards of Conduct (Code). In so doing, we ensure that our business is conducted consistently with the high ethical standards that we demand from each other, and that others have the right to demand from us.

OUR PURPOSE

Sandia develops advanced technologies
to ensure global peace.

OUR VALUES

- Service - Respect - Integrity -
- Excellence - Teamwork -

OUR BEHAVIORS

Have a Passion for Mission Success

Understand and overcome challenges. Be accountable for getting results.
Focus on making things better.

Be a Champion for Our Sponsors

See the world through the sponsor's eyes. Understand what our sponsors really need, and deliver on those needs. Promote confidence and trust.

Think Big...Then Make It Happen

Dream of possibilities instead of limitations. Innovate, iterate, test, try, and take thoughtful risks. Translate the best ideas into realistic, pragmatic, and executable plans.

Act with Urgency and Responsibility

Anticipate and proactively mitigate safety and security risks. Act quickly and responsibly when faced with ambiguity. Get the facts so that you can assess and move with speed. Never put off until tomorrow what you can do today.

Be Courageous

Confront problems directly and face adversity head-on. Be comfortable challenging the status quo. Take on seemingly impossible goals and work out of your comfort zone.

Go Beyond

Be committed to putting in your maximum work effort and always do what you say. Be the someone people trust to get things done and deliver.

Inspire Greatness

Empower, develop and set high expectations for yourself, direct reports, peers, and others. Embrace diversity and inclusion. Bring others with you, achieve things you never thought possible, and celebrate successes.

Become Your Best

Seek and accept feedback wherever you can get it. Take actions to improve and assess progress. Bounce back from disappointments.

OUR ACCOUNTABILITY

Accountability at Sandia means that, as an institution, we are a values-based, critical thinking, learning organization.

As individuals:

- We act in accordance with:
 - Our Values
 - Our Code of Conduct
 - Our Policies
- We perform work in accordance with internal and external standards of excellence.
- We engage critical thinking to inform our decision-making judgement and our actions.
- We learn from our mistakes, share what we learn, and hold each other accountable to mitigate both individual and institutional risks.

>>> [Go to Sandia's Accountability Model](#)

WE ARE EACH ACCOUNTABLE **for** UPHOLDING THE CODE

Our Code applies to all leaders, employees, and members of the Board of Managers. You are responsible for adherence to the standards of conduct set forth in this Code and for raising questions if you are concerned that these standards are not being met.

Violations of the Code are cause for corrective action, which may result in disciplinary action up to and including termination.

You should speak up and seek resolution regarding issues that arise in your work environment. At times, simply asking questions, gathering additional information, reframing the issue, or talking to subject matter experts can prevent a violation of the Code. These actions should always be done in a timely manner when an issue arises.

Leaders: As a leader, you must be particularly careful with your words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to perform in a way that is contrary to the ethical standards set forth in the Code and our policies. If an employee approaches you with a question or a concern relating to the expectations set forth in the Code, listen carefully and ask for clarification and additional information to ensure that you fully understand the question or concern. Answer any question that you can, but seek help if you need it before you respond. You are not required to provide an immediate response, but should always acknowledge the inquiry and get back to the individual as soon as possible. If the concern raised requires that an investigation be conducted to determine compliance with the Code, identify and contact the appropriate resource from the section titled, "Report Violations of this Code."





WE ACT IN ACCORDANCE WITH OUR OBLIGATIONS as a Federally Funded Research and Development Center (FFRDC)

On behalf of the National Nuclear Security Administration (NNSA), National Technology and Engineering Solutions of Sandia, LLC (NTESS) manages and operates Sandia National Laboratories, a Federally Funded Research and Development Center, or "FFRDC." A special relationship exists between the government and an FFRDC that is significantly different from the government's relationship with other government contractors.

Federally Funded Research and Development Center employees can be provided enhanced access to internal government information, government personnel, facilities, and other resources beyond that of a typical government contractor. This relationship carries certain responsibilities, and Sandia acts in

accordance with its obligations as an FFRDC.

As FFRDC employees, we must operate in the public interest with objectivity and independence, and remain free from personal and organizational conflicts of interest. Interactions with government and parent company representatives must be approached with respect for these values.

Government interactions

As a Federally Funded Research and Development Center (FFRDC), Sandia is obligated to serve in the national interest with objectivity and independence. Members of the Workforce are responsible for ensuring that their work to complete the mission of the Labs remains within corporate policy, specifically when interacting with government officials.

The strictures of this policy are as follows:

- When acting within the scope of their employment, Members of the Workforce must coordinate and receive approval from Government Relations before communicating with all federal, state, and local elected officials, and their respective staffs; federal cabinet secretaries, deputy secretaries, and undersecretaries; tribal executives; state cabinet secretaries and deputy secretaries; and local government staff offices.
- When acting within the scope of their employment, Members of the Workforce may not engage in any actions seeking to advocate for specific outcomes or decisions from government. These actions include, but are not limited to: lobbying (i.e., advocating for outcomes), including all planning or preparatory work leading to lobbying activities; conducting campaign activities; influencing elections, referendums, or initiatives; and working with a professional society to engage, or in the preparation for engagements, to advocate for specific outcomes.

Parent company interactions

Sandia's position as an FFRDC also guides our relationship with our parent company, Honeywell International, Inc. As an FFRDC, Sandia is an identifiably separate operating unit from that of our parent organization, and is required to operate in the public interest, free from organizational conflict of interest. Each employee:

- Must avoid actions or communications that can be interpreted as conflicting with our FFRDC commitments for independence and objectivity.
- Must not act or communicate in a way that appears to favor the interests of Honeywell or its named businesses over those of the Department of Energy National Laboratories, the NNSA, other contractors and subcontractors, or other federal government customers.
- Must not provide important technology information where this information is not provided to other potential industry partners government customers.

WE COMPLY WITH LAWS and REGULATIONS

We are committed to upholding both the letter and the spirit of the laws and regulations that govern our business. When working for Sandia, you are expected to perform your duties on behalf of Sandia in compliance with all laws, regulations, and our policies and procedures. Subject matter experts and the Legal and Prime Contract Division (Legal) are always available to help you understand the laws and regulations that apply to your job. You should understand, however, that upholding our values and the Code may require more than mere compliance with laws and regulations; Ethics/ EEO Advisory and Investigative Services (Ethics/EEO) is available for consultation in this area.

If you perform work internationally you are also subject to the laws and regulations of the countries in which we do business. You may find that there is a conflict between the laws of the countries in which we operate and the laws of the United States or our policies. In those situations, you should consult with subject matter experts in International Security and Risk Management, or Legal, to receive direction on how to handle the conflict. Also reference the more detailed discussion of these issues in the section titled, "Do Business Ethically outside the United States."



WE CONDUCT RESEARCH and DEVELOPMENT to the HIGHEST SCIENTIFIC, PROFESSIONAL and ETHICAL STANDARDS

The development of advanced technologies is at the core of who we are as a national laboratory. The manner in which we conduct our research reflects upon each researcher, their colleagues, and our ability to retain the trust of our nation.

Each employee engaged in research and development is expected, at a minimum, to maintain appropriate research records, to verify the soundness of research methods and the accuracy of results, provide credit for prior work, acknowledge appropriate contributors, employ peer review consistent with the policies of the line organization, the laboratory, and the sponsor of

the research, and report results objectively, honestly and thoroughly.

We are responsible for maintaining the integrity of our research, including the prevention, detection, and remediation of research misconduct. While there may be honest errors or differences of opinion in conducting research, fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results is strictly prohibited. Sandia's Research and Development Integrity Office can assist with R&D questions and inquiries and will partner with the Ethics/EEO Office when an investigation of research misconduct is required.



Any reference to "Legal" in this document refers to the Legal and Prime Contract Division.

Any reference to "Ethics/EEO" in this document refers to the Ethics/EEO Advisory & Investigative Services Office.

WE STRICTLY PROHIBIT DISCRIMINATION and HARASSMENT

We are committed to good citizenship, which we believe includes the protection and advancement of human rights. You are responsible for upholding this long-standing commitment; by incorporating Sandia's Values and Behaviors which encourage inclusion and diversity, promote equal opportunity for all, and create an ethical culture.

Respecting others and performing with excellence creates opportunities to achieve success in our workplace. You are expected to treat all employees, contractors, and customers with dignity and respect. Our goal is to maintain a professional work environment that is free from threats and acts of violence, bullying, abusive or intimidating conduct, or other similar behavior. Sandia fosters

a work environment that is free from discrimination and harassment and in which all members of the workforce are treated with courtesy and respect regardless of their race, ethnicity, religion, color, gender, national origin, age, United States military veteran's status, ancestry, sexual orientation, gender identity, gender expression, marital or family status, pregnancy, genetic information, serious medical condition, or mental or physical disability. We do not tolerate harassment or discrimination of any kind and take appropriate corrective action if it does happen.

If you are a leader, you have a distinct responsibility for promoting a positive, inclusive and diverse, work environment where everyone may raise issues or concerns without fear of retaliation.

YOU ARE RESPONSIBLE FOR
UPHOLDING SANDIA'S
LONG-STANDING COMMITMENT
TO GOOD CITIZENSHIP.

WE MAINTAIN a SAFE and HEALTHY WORK ENVIRONMENT



We are committed to providing a drug-free, tobacco-/smoke-free, safe and healthy work environment. You may not be under the influence of alcohol or illegal drugs, or abuse legal drugs, in the workplace or in the performance of company business at any time. You may not smoke, use or sell tobacco products on Sandia premises.

You are expected to maintain a safe work environment by invoking critical thinking and actively engaging in identifying opportunities for improvement for all activities, on or off Sandia premises. You are expected to identify and report events that could adversely affect the health and safety of the public, workers, or the environment. This includes identifying hazards, assessing potential risks, and evaluating mitigations for those potential risks prior to conducting activities. Refer to our Integrated Safety Management System (ISMS).

WE ACCURATELY CHARGE Labor and Other Costs

You and your manager are responsible for understanding and complying with our labor-recording policies and procedures. You are also responsible for properly accounting for labor, travel, material, and other costs, and ensuring these costs are

recorded and charged promptly and accurately.

Knowingly mischarging the time that you work or falsifying your time keeping violates our policies and the law. No employee shall knowingly charge an incorrect project or knowingly approve such mischarging.

WE MAINTAIN ACCURATE Business Records

As an FFRDC, we have trusted access to resources beyond a typical government contractor. We must honor this special trust by ensuring the integrity of our accounting and business records.

You must ensure the accuracy of any business or financial records for which you are responsible. These include not only financial accounts, but other records such as quality reports, time records, expense reports, and/or any information disseminated externally or to a broad internal audience.

If you are responsible for the preparation of any business or financial records on behalf of Sandia, or for making public communications, you must ensure that all information contained in such records or

communications is full, fair, timely, accurate, and understandable.

You should not include any proprietary, confidential or classified information in any public disclosures. Formal review and approval is required for all public releases of information. Public disclosures include reports or documents filed with regulatory authorities, and other public communications made by Sandia.

If you have concerns about any aspect of our business or financial records, or auditing matters, or you learn that others have such concerns, you should talk to your manager, the Financial Policy, Performance & Assurance organization, Audit, Legal, or Ethics/EEO.



WE STRICTLY ADHERE to RESTRICTIONS on FFRDC COMPETING with PRIVATE INDUSTRY and COMPLIANCE with ANTITRUST LAWS

While we value open and fair competition, federal regulations prohibit us from competing for work with private industry. We do not knowingly enter into business arrangements that are in competition with the private sector.

You are expected to know that antitrust laws may apply to your activities. You must avoid engaging in or discussing any activities that could be perceived as violating antitrust laws and should consult with Legal as necessary. The following are examples that may violate antitrust laws:

- Price fixing;
- Boycotting contractors or customers;
- Pricing intended to run a company out of business;
- Disparaging, misrepresenting or harassing a company;
- Teaming with companies to try to block competition and prevent market entry;
- Bribery, kickbacks, or stealing trade secrets;
- Entering into agreements or understandings to divide the market by allocating territories or markets, and/or limiting the production or sale of products or product lines;
- Conditioning the sale of one product/service on the sale of another unwanted product/service; and/or
- Conditioning the sale or purchase of products/services on the requirement that the seller or purchaser not do business with others.



SANDIA DOES NOT KNOWINGLY ENTER INTO
BUSINESS ARRANGEMENTS THAT ARE IN
COMPETITION WITH THE PRIVATE SECTOR.

WE DO BUSINESS ETHICALLY OUTSIDE **the** UNITED STATES

Our commitment to the highest standards of ethical conduct applies globally. Bribery, violations of export and import laws, rules, regulations and participation in illegal boycotts erode confidence in the marketplace, undermine democracy, distort economic and social development, and hurt everyone who depends on trust and transparency in the transaction of business.

Unless prohibited or penalized by U.S. law, you are responsible for complying with the national and local laws of the countries in which we operate. In the case of a conflict with U.S. law, you must obtain direction from Legal. In particular, you must pay special attention to the following laws:

Anti-corruption:

You must comply with the anti-corruption laws that govern our operations in the countries in which we do business. Such laws include the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and similar laws enacted by other countries. Together, these laws prohibit bribery, directly or indirectly, of foreign government officials, political parties, party officials, or candidates for public office, to obtain or retain business or an

improper business advantage. They also prohibit knowingly falsifying a company's books and records or knowingly circumventing or failing to implement adequate internal accounting controls, which could facilitate or conceal bribery. Our policy prohibits anyone conducting business on behalf of Sandia, including all employees, contractors, and consultants, from offering or making any improper payments of money or anything of value to government officials, political parties, or candidates for public office. Our policy prohibits facilitating payments (those made to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance), but allows personal safety payments where there is an imminent threat to health or safety.



Export/Import and Other Trade Restrictions:

When interacting with foreign nationals, you are required to comply with all export and import laws, rules and regulations that govern the transfer/sharing of controlled items, information and software inside or outside of the United States. The export controls that govern such transfers, as well as the rules pertaining to the import of goods and services, are complex. You must be careful to avoid even inadvertent violations.

In addition, you may not obligate Sandia to engage in trade in any country subject to trade restrictions imposed by the U.S. government without prior and appropriate government authorization. Such restrictions can include sanctions or embargoes that prohibit us from engaging in certain business activities in specified countries, and with specified individuals and entities.

For example, U.S. law prohibits interaction with identified terrorist states and organizations.

To ensure compliance with these laws, rules and regulations including sanctions and embargoes, you are responsible for consulting with the International Export and Trade Compliance Organization in Legal before negotiating or entering into any foreign transaction.

Anti-boycott:

You may not enter into an agreement, provide any information, or take any action that would cause Sandia to refuse to deal with potential or actual customers, contractors, or others in support of an illegal boycott, or otherwise to engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. government. All requests to engage in any such activity, whether written or oral, must be reported immediately to Legal.



WE FOLLOW GUIDELINES for POLITICAL CONTRIBUTIONS and ACTIVITIES

We respect the integrity of the political process; however, your involvement and participation in the political process must be on an individual basis, on your own time, at your own expense, and without the use of government resources such as e-mail, photocopiers, telecommunications equipment or internet access. Political activities may not be conducted on government or Sandia premises, inclusive of Kirtland Airforce Base. You must be aware of, and avoid, conflicts of interest that can arise if you campaign for or hold public office or serve on commissions or

advisory groups. If you plan to seek or accept a public office, you must consult with Sandia's Government Relations department and the Legal division. We are committed to upholding the spirit and letter of all laws relating to its participation in the political process.

Many countries, including the United States, prohibit us from donating corporate funds, goods, or services, directly or indirectly, to political candidates. This includes employees' work time. Local and state laws also govern our political contributions and activities.





WE PROVIDE **and** ACCEPT APPROPRIATE BUSINESS COURTESIES

Employees at all levels are responsible for the following:

- Ensuring that the offer or receipt of anything of value is permitted by law and regulation, does not violate either our rules and standards, or those of the recipient's organization, complies with this policy, and will not adversely affect the reputation of or embarrass Sandia.
- Consulting with your manager or Ethics/EEO if, after reviewing our policy, you have questions about offering or accepting business courtesies.
- Ensuring that you do not use personal funds or assets to circumvent this policy. All business-related expenditures and reimbursements must be accounted for in accordance with our policies and procedures.
- Reporting any suspected or known violations of this policy directly to your supervisor, manager, Human Resources Business Partner, Ethics/EEO, or Legal. We prohibit retaliation against anyone who, in good faith, reports suspected misconduct.

If you are involved in a procurement or financial role, (including employees who work with or evaluate current contractors or potential suppliers) you must be especially mindful to avoid actions that could be perceived as a conflict of interest. These employees have a more limited threshold for accepting business courtesies (e.g., meals, awards, prizes).

WE AVOID PERSONAL and ORGANIZATIONAL CONFLICTS of INTEREST

A personal conflict of interest exists when you have divided loyalties – when you have a direct or indirect personal interest in a transaction or matter such that it might reasonably appear to affect the judgment that you exercise on behalf of Sandia, or in any way influence your actions.

You are responsible for acting in a fair and impartial manner in all business dealings, and to place the interests of Sandia over personal interests in matters relating to Sandia business. This includes financial, business, or other transactions or situations. Such situations may arise from relationships with customers, contractors, present or prospective employees (including peers or subordinates), or from the acquisition or use of either corporate or government assets for personal gain.

Business relationships with family members and friends can result in a conflict of interest, or the appearance of a conflict. For this reason, you should never be involved with or attempt to influence the bidding, negotiating, or contracting process between yourself, a family member or a close friend and Sandia. You are also responsible for avoiding improper reporting relationships, which means you may not directly or indirectly supervise, or work under

the supervision of, a family member or someone with whom you have a close personal relationship.

An actual conflict of interest does not need to be present to constitute a violation of this Code; you must also avoid activities that create the appearance of a conflict of interest. You must disclose in writing, through the Personal Conflict of Interest (PCI) form, any situation, transaction, or relationship that might give rise to an actual or potential conflict of interest to your manager or supervisor, who will review the disclosure with Ethics/EEO. Sandia Delegated Representatives (SDRs) should report any personal conflicts of interest with the contractors they monitor.

An organizational conflict of interest could occur if Sandia is perceived as unable or potentially unable to render impartial assistance, service, or advice to the government; if objectivity is impaired; or if Sandia has or provides an unfair competitive advantage to Honeywell, a member of the NTESS team or a third party. Your early identification and timely communication of potential conflicts of this nature allows us to continue to participate in new business opportunities and reinforce our intention to conduct business with integrity.

WE AVOID CONFLICTS of INTEREST *when* HIRING FORMER GOVERNMENT EMPLOYEES

Our continued success depends on ensuring that we do not hire or work with former government employees in any manner that creates a real or perceived conflict of interest.

You are responsible for ensuring that we avoid conflicts of interest regarding employing or acquiring the services of current or former government employees. This includes employing or acquiring the services of current or former military personnel and other federal government employees. Sandia's processes exist to ensure that potential employees or contractors comply with federal conflict of interest requirements, and to ensure that post-government

employment restrictions are considered and followed. You must comply fully with all laws, regulations and processes pertaining to employing or acquiring the services of former government employees. These rules apply to contact or negotiations with current government employees to discuss their potential employment by Sandia or their use as consultants or subcontractors. These rules also may restrict the roles and responsibilities that former government employees may perform on our behalf after joining Sandia. If you have questions, you should consult our policies and procedures, and seek the advice of your supervisor, manager, Human Resources, Ethics/EEO, or Legal.





WE PROPERLY ENGAGE SUBCONTRACTORS

Subcontract Professionals are the only individuals authorized to make subcontract commitments on behalf of Sandia National Laboratories. We only work with subcontractors who share our commitment to upholding the highest standards of business integrity. The actions of our subcontractors can reflect on and impact our reputation. Business integrity and commitment to obeying the law are key considerations in the selection and retention of those who represent us.

We must not engage a subcontractor to conduct business in a manner that is contrary to our policies or procedures or that would circumvent

our values. For example, you must not engage any entity for the purpose of paying bribes or kickbacks, engaging in industrial espionage or human trafficking, obtaining the proprietary data of a third party without authority, or improperly gaining inside information or influence.

You are responsible for working with the Integrated Supply Chain Management organization prior to engaging a subcontractor. Subcontractors must comply with their subcontracts and all applicable laws, regulations, and administrative requirements.

WE PROTECT SENSITIVE INFORMATION

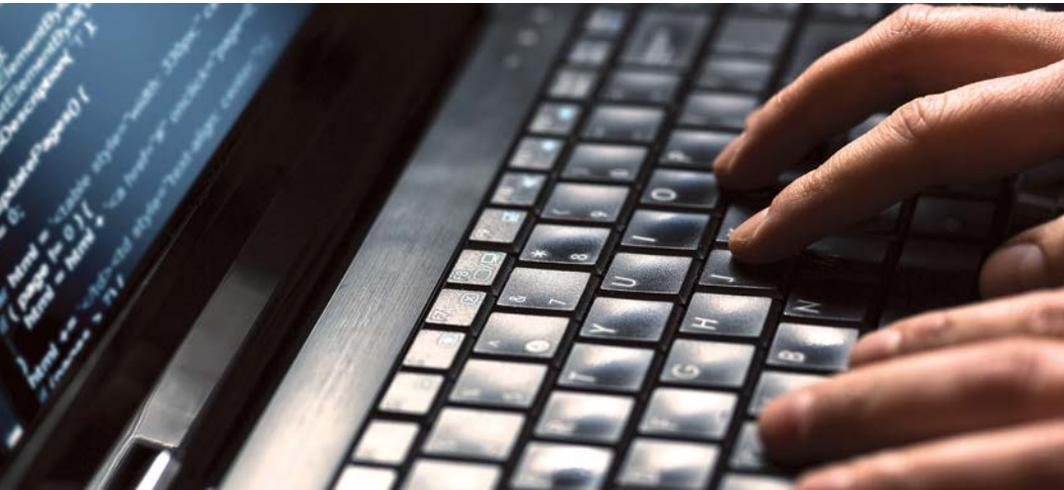
Our customers and contractors trust us to protect sensitive information. We generate sensitive information in our day-to-day work, and we regularly receive sensitive information from our customers, contractors, and others. Our obligation to protect sensitive information extends beyond our employment with Sandia.

You must keep sensitive information, including any proprietary documents, protected and secure, and you must follow our requirements to ensure that all Sandia and/or government documents are appropriately marked. You may only disclose sensitive information if you have the proper authorization to do so.

Review & Approval is our process to ensure that information is ready for release and is required

whether that information is to be conveyed through a talk, paper, or presentation. Preventing the unintentional release of classified or sensitive information, protecting patentable inventions, and communicating a professional image are all a part of risk management.

In the course of normal business activities, contractors or customers may sometimes divulge information that is proprietary to their business. You may only accept or use the proprietary information of a supplier or customer if such use or acceptance complies with our policy. If you receive proprietary information from a supplier or customer without proper authorization, such as a non-disclosure agreement, you must immediately bring this to the attention of Legal.



WE PROTECT PERSONAL INFORMATION

Each leader, employee, member of the Board of Managers, and contractor entrusts to us personal information. To continue building and sustaining a culture of trust, we must protect this sensitive data and use it only for authorized purposes.

You must not access personal information unless you have a “need to know” for legitimate business purposes and have prior authorization.

If you have access to personal information (including medical records, social security numbers, dates of birth and other Personally Identifiable Information (PII)), you may not disclose such information without proper authorization. You must keep personal information protected and secure in accordance with all corporate policies, procedures, laws, and applicable third-party agreements. You must never use personal information for any purpose for which it was not intended or for personal gain.

If you collect or access personal information on behalf of Sandia, you are responsible for knowing and complying with all applicable laws and policies that govern such activities.

If you become aware or believe that personal information has been accessed by an unauthorized

person, disclosed inappropriately, used for purposes other than official business, or gathered in violation of corporate policy or the law, you must immediately bring this to the attention of the Chief Privacy Officer (Legal).

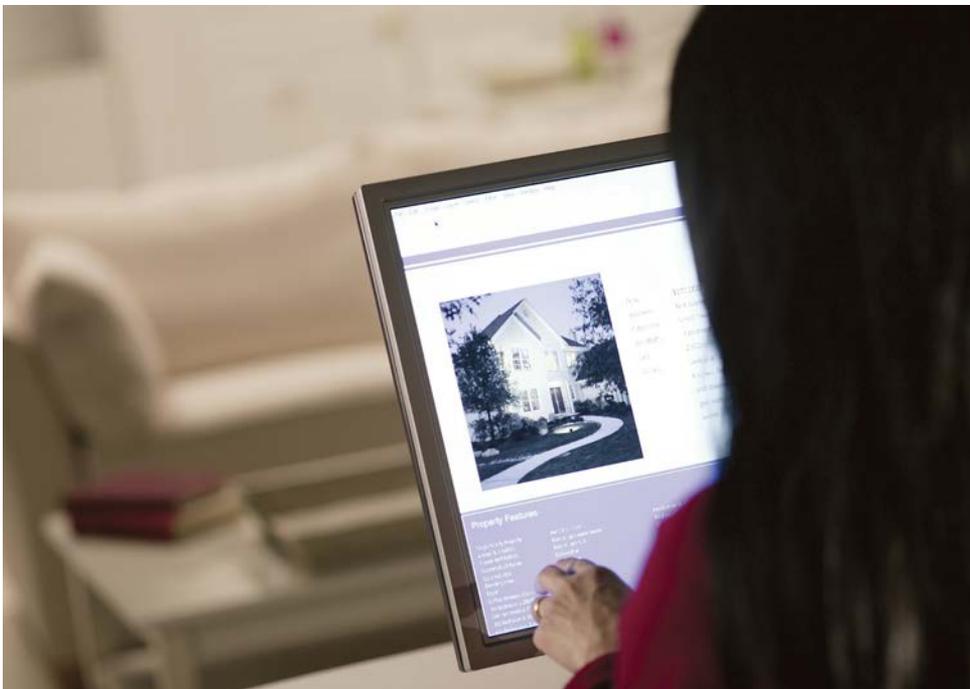


WE PROPERLY USE GOVERNMENT ASSETS

Our resources and assets do not belong to us – they belong to the government. We have a special responsibility to protect the government’s resources and assets. You are responsible for the proper use of property, electronic communication systems, information resources, materials, facilities, and equipment. You must use and maintain these assets with the utmost care and respect, guarding against waste and abuse, and you must never borrow or remove them from government property without management’s permission.

Government assets are intended to be used for the conduct of our business. You may occasionally use such assets for personal use if your use is in accordance with our policy. You may not use Sandia’s or government resources to support a personal business or for an illegal act or a purpose which would cause embarrassment to Sandia. The incidental use policy does not apply to outside business activity.

Use of a corporate credit or procurement card for personal use is strictly prohibited.



WE EACH PARTICIPATE in CORPORATE-WIDE and ANNUAL AWARENESS TRAINING

We have developed education and communication programs in many subject areas to provide employees with job-specific information to raise their level of awareness and sensitivity to key issues.

We require all employees and the Board of Managers to participate in its Annual Awareness Training. You are required to complete Annual Awareness Training annually

and other compliance training as assigned. Completion of annual Annual Awareness Training and Business Conduct Compliance Training is a condition of your continued employment with Sandia.

The current list of corporate-wide training courses can be found on Sandia's Talent Management & Development (TM&D) website.



REPORT VIOLATIONS of the CODE OF ETHICS and STANDARDS OF CONDUCT

You have many different channels to report violations or potential violations of the Code, including your manager, Human Resources, Legal, Security, Independent Audit & Advisory Services, the Environment, Safety and Health organization, and Ethics/EEO, as appropriate.

If you have any reason to believe that a violation of the Code or a contract provision has occurred, or if you are asked to violate it or a contract provision, don't remain silent. You should take action and report such violations, or suspected violations in a timely fashion.

Depending on the circumstances, failure to report may place you in violation of the Code. Remember that no unethical or illegal acts can be justified, period. Similarly, stating that those actions were directed by a higher authority in the organization does not justify violation of the Code.

You are encouraged to contact Ethics/EEO to discuss any ethics question or concern. When faced with an ethical dilemma, it is always better to obtain guidance before acting.



**ETHICS DIRECTOR:
NANCY S. DAVIS**

Call: 505-845-9900
(Ethics/EEO)

Write: Ethics/EEO Advisory &
Investigative Services Office
Sandia National Laboratories,
MS1460
1515 Eubank SE,
Albuquerque, NM 87123

E-Mail: ethicsteam@sandia.gov

Honeywell

INTEGRITY HELPLINE:

Call: 800-237-5982
(ACCESS Integrity and
Compliance Helpline)

Write: Honeywell International, Inc.
Attn: ACCESS
115 Tabor Rd
Morris Plains, NJ 07950

E-Mail: access.integrity.helpline@honeywell.com

Note: Caller ID is not used on the Sandia Ethics/EEO Helpline phone number

RESPOND to INVESTIGATIONS and LEGAL ACTION

You are required to cooperate in internal and external investigations and audits. You must never destroy or alter any documents or electronic records, lie to or mislead an investigator through commission or omission, or obstruct the collection of information that relates to an investigation, audit, or any legal action brought on behalf of, or against, Sandia.

To the greatest extent possible, Sandia will cooperate with government agencies responsible for investigating suspected violations of law. You must notify Legal and Internal Audit as soon as you learn that a government agency or any third party is conducting an investigation or audit or asking for information pertaining to a suspected violation of law. Legal or Audit will help you review information before it is released to an investigative organization.



CONTACT ETHICS/EEO ADVISORY & INVESTIGATIVE SERVICES (Ethics/EEO)

What can you expect when you contact Ethics/EEO?

- Your concern will be treated seriously and fairly.
- You will be treated with dignity and respect.
- You need not identify yourself.
- Whether you identify yourself or not, your communication will be kept confidential to the greatest extent possible.
- If your concerns are not resolved at the time you call, you will be informed of the outcome. If you have reported anonymously, you can call the Ethics/EEO Helpline to learn the outcome of the case.
- Due to privacy considerations, you likely will not be informed of the details of any discipline that may result from an investigation into your concerns.

What is Retaliation?

Retaliation is unfair or inappropriate treatment against an employee for reporting misconduct, filing a complaint, assisting another in making a complaint, participating in an internal investigation, or making an Ethics/EEO-related inquiry.

Our Standard

- We take appropriate corrective action in response to violations of this Code, even if these actions are not always visible to you.
- If someone tries to stop you from reporting an issue, that person can be subject to disciplinary action up to and including termination.
- There is never a penalty for contacting Ethics/EEO or any source in good faith. "Good faith" does not mean you have to be right, but it does mean you believe the information provided is truthful.

Why We Do It

- Retaliation destroys trust and damages our ethical culture.
- When you speak up, it gives us the opportunity to improve our overall culture and performance.

RETALIATION:

Sandia will not tolerate retaliation against employees who raise concerns to any source in good faith.



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