



Sandia
National
Laboratories

CODE OF CONDUCT

June 2023

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



Contact Us

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

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

Write: **Ethics/EEO Advisory & Investigative Services Office
Sandia National Laboratories**

PO Box 5800, MS1460
Albuquerque, NM 87123-1460

E-Mail: ethicsteam@sandia.gov



James Peery
Laboratories Director

A Message from James Peery

COLLEAGUES:

Sandia plays a central role in America's defense, from certifying the nuclear weapons stockpile to assessing threats of emerging technologies.

To achieve our national security mission, we must adhere to the highest standards of professional ethics, integrity, conduct, and accountability. Maintaining these standards earns the trust of our customers and sponsors.

Sandia's Code of Conduct includes expectations and requirements for employees, the Board of Managers, visitors, and others who act on behalf of the Laboratories. You are expected annually to read and acknowledge your understanding of this document.

If you have any questions regarding your ethical responsibilities, talk with your manager, Human Resources, or the Ethics/EEO Advisory and Investigative Services staff. You also can 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."

- James



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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 (Code). 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 Values & Our Accountability

Sandia holds all leaders, employees, and members of the Board of Managers accountable for upholding our values and the standards and expectations in the Code. In so doing, we ensure that our business is conducted consistently with the high ethical standards that we demand from one another, and that others have the right to demand from us.

“...exceptional service in the national interest”

OUR VALUES

- We serve the nation
- We respect each other
- We act with integrity
- We deliver with excellence
- We team for great results



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

EXPECTATIONS OF OUR LEADERS

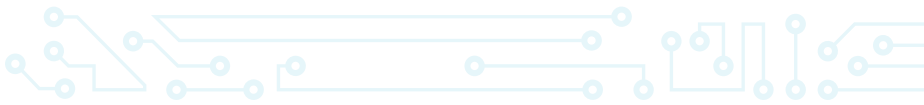
As a leader, you must avoid placing, or seeming to place, pressure on subordinates that could cause them to perform in a way that is contrary to the Code and our policies. If an employee approaches you with a question or a concern, listen carefully and ask for clarification and additional information to ensure that you fully understand. 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 an investigation be conducted, contact the appropriate resource from the section titled, "We Report Violations of the Code of Conduct."

>>> GO TO [SANDIA'S ACCOUNTABILITY MODEL](#)





We Act in Accordance with Our Obligations as a Federally Funded Research & Development Center



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.” The relationship that exists between the government and an FFRDC is significantly different from the government’s relationship with other government contractors.

FFRDC employees can be provided with 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 obligations as an FFRDC.

As an FFRDC, Sandia serves 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 [*Laboratory policies*](#).

[*Who We Are*](#)



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 a separate operating unit from that of our parent organization and is required to operate in the public interest, free from organizational conflicts of interest.

[Policy LG002: Organizational Conflicts of Interest Policy](#)



We Comply with Laws & Regulations

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 processes. Subject matter experts and the Legal and Prime Contract Division (Legal)¹ are available to help you understand the laws and regulations that apply to your job.

¹ Any reference to "Legal" in this document refers to the Legal and Prime Contract Division.

We Conduct Research & Development to the Highest Scientific, Professional & 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.

Employees are responsible for maintaining the integrity of Sandia's research and development (R&D), including the prevention, detection, and remediation of R&D misconduct. Leaders are responsible for fostering a R&D environment and monitoring for potential stressors that may undermine R&D integrity. Sandia realizes the fullest value of its R&D through all aspects of sound methodologies, peer review, maintenance of R&D records, transparency and reproducibility of results, equity in providing references and giving credit, and knowledge stewardship. We implement activities and programs to promote R&D integrity and prevent R&D misconduct (Department of Energy Acquisition Regulation on Research Misconduct, DEAR 935.070), which includes fabrication, falsification, or plagiarism but not honest error or differing professional opinion.

Sandia's Office of Research and Development Excellence can assist with R&D integrity inquiries and will partner with the Ethics/EEO Office when an investigation of research misconduct is required.

See the [Office of Research & Development Excellence website](#) for more information.

[Policy RD001: Research & Development Integrity Policy](#)



We Strictly Prohibit Harassment, Discrimination & Retaliation

As a Sandian, you are responsible for upholding the Labs' long-standing commitment to good citizenship.

You are expected to treat all employees, contractors, and customers with courtesy, dignity and respect regardless of identity, [*dimensions of diversity*](#) or any [*protected characteristic*](#).

Our goal is to maintain a professional work environment that is free from offensive, intimidating, or abusive conduct, bullying, threats, or acts of violence, or other similar behavior.

We do not tolerate harassment, discrimination, or retaliation 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.

[*Policy HR008: Prohibition Against Harassment, Discrimination, and Retaliation Policy*](#)





We Maintain a Safe & Healthy Work Environment

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, and knowing what actions to take in an emergency. You are expected to identify lessons learned to ensure continuous improvements are implemented. As an employee, you have the right and responsibility to stop any work based on a reasonable belief that the work poses an imminent risk of harm to individuals or the environment. Refer to our Integrated Safety Management System (ISMS).

[Policy ESH001: Environment, Safety, and Health Policy](#)

We Accurately Charge Labor & 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. Mischarging the time that you work or falsifying your time reporting violates our policies and, potentially, the law.

[Policy HR012: Time Charging Policy](#)



We Maintain Accurate 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.

You must not include any proprietary, confidential, or classified information in any public disclosures. Formal review and approval are required for all public releases of information.

[Policy IT010: Manage Records Policy](#)

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

We Strictly Adhere to Restrictions on FFRDCs Competing with Private Industry & Compliance with Antitrust Laws

While we value open and fair competition, federal regulations prohibit us as an FFRDC 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.

[Policy PC003: Respond to Federal and Non-Federal Opportunities Policy](#)

[Policy LG002: Organizational Conflicts of Interest](#)

We Do Business Ethically, Inside & Outside the United States

Sandia will not engage in, or otherwise tolerate, any form of bribery or corruption in its business dealings, and specifically prohibits offering, giving, soliciting, or receiving any form of bribe or kickback. These are criminal acts under U.S. and non-U.S. laws, including, but not limited to, the Foreign Corrupt Practices Act. Sandia also prohibits any form of gambling on Sandia-controlled premises or using Sandia resources.

Employees must ensure that the offer or receipt of *business courtesies*, *gifts*, or *honoraria* is permitted by law and regulation, does not violate either Sandia's policies or those of the recipient's organization, and will not embarrass Sandia or adversely affect the Laboratories' reputation.

[Policy IAEB003: Exchange of Business Courtesies, Gifts, Hospitality, and Honoraria Policy](#)

[Policy IAEB002: Personal Conflicts of Interest Policy](#)

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, consult with subject matter experts in International Security and Risk Management or Legal, to receive direction on how to handle the conflict.

[Policy SS009: Foreign Interactions Policy](#)



We Follow Guidelines for Political Contributions & Activities

As an FFRDC and Department of Energy National Laboratory, Sandia National Laboratories is not permitted to lobby, and employees are prohibited from lobbying on behalf of Sandia National Laboratories. When acting within the scope of their employment, Members of the Workforce must coordinate with and seek approval from Government Relations when interacting with all high-level government officials. We respect the integrity of the political process; however, your involvement and participation in the political process must be as a private citizen, on your own time, at your own expense, and without the use of government resources. Political activities may not be conducted on Sandia premises, including leased space, or federal property (e.g., Kirtland Air Force Base). Should you choose to partake in political activities as a private citizen, you must avoid the inference that your political activities imply or appear to imply Sandia sponsorship, endorsement, or approval of a political candidate, campaign, or cause. If you plan to seek or accept a public office, you must consult with Sandia's Government Relations department.

Policy GGR002: Government Relations Policy



Members of the Workforce may make a monetary contribution(s) to a political campaign or cause as a private citizen, as long as they do so without the use of any Sandia or federal resources.

We Avoid Conflicts of Interest

Personal 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.

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 employment, activity, transaction, financial interest, or relationship that might give rise to an actual or perceived conflict of interest. Sandia Delegated Representatives (SDRs) should report any actual or perceived personal conflicts of interest with the contractors they monitor.

[Policy IAEB002: Personal Conflicts of Interest Policy](#)

[Policy ISCM001: Procurement Policy](#)



Organizational Conflicts of Interest: Organizational conflicts of interest risk could occur if NTESS is perceived as unable or potentially unable to render impartial assistance, service, or advice to the government; if objectivity is impaired; or if NTESS 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.

[Policy LG002: Organizational Conflicts of Interest Policy](#)

Hiring Former Government Employees: You are responsible for complying fully with all laws, regulations, and policies and avoiding conflicts of interest regarding employing or acquiring the services of current or former government or military employees. Sandia's policies ensure that potential employees or contractors comply with federal conflict of interest requirements and ensure that post-government employment restrictions are considered and followed.

If you have questions, you should consult our policies and procedures, and seek the advice of your supervisor, manager, Human Resources, or Legal.

[Process HR002: Talent Acquisition](#)

[Policy HR002: Talent Acquisition, Hiring Manager Section](#)

[Process HR002.1: Hiring Process](#)



We Protect Sandia Information



Sensitive Information: Your obligation to protect sensitive information generated or received in the course of your work extends beyond your 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, government, and third-party documents are appropriately marked. You may only disclose sensitive information if you have the proper authorization to do so.

[Policy IT013: Sandia Proprietary Information Policy](#)

When working in a potentially classified subject area, you should consult with a Derivative Classifier to ensure proper protection of classified information. This includes information to be conveyed through a talk, paper, or presentation. Programmatic and Formal Reviews can be accomplished through Information Release.

[Policy IT011: Prepare and Release Information Policy](#)

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.

[Policy IT024: Third Party Proprietary Information 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.





Personal Information: 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. You must never use personal information for any purpose for which it was not intended or for personal gain.

[Policy IT023: Personally Identifiable Information \(PII\) Policy](#)

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 policy or the law, you must immediately bring this to the attention of the Chief Privacy Officer (Legal).

We Properly Engage Subcontractors

You are responsible for working with the Integrated Supply Chain Management organization prior to engaging a subcontractor.

Subcontract Professionals are the only individuals authorized to make or modify subcontract commitments on behalf of Sandia National Laboratories.

You must not engage a subcontractor to conduct business in a manner that is contrary to our policies or processes or that would circumvent our values.

Subcontractors must comply with their subcontracts and all applicable laws, regulations, and administrative requirements.

[Policy ISCM001: Procurement Policy](#)



We Properly Use Government Assets

Our resources and assets do not belong to us – they belong to the government. You must use and maintain Sandia property, electronic communication systems, information resources, materials, facilities, and

equipment 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. You may not use Sandia or government resources to support a personal business, any outside business activity, or for an illegal act or a purpose that would cause embarrassment to Sandia. Sandia's incidental use policy defines when the occasional use of resources is acceptable.

[Policy IT002: Use Sandia's Information Technology Resources Policy](#)

[Policy ISCM004: Manage Property and Materials](#)

We Participate in Corporate-Wide & Annual Ethics Awareness Training

Sandia has developed education and awareness programs in many subject areas. We require all employees and the Board of Managers to participate in Annual Ethics Awareness Training and other compliance training as assigned.

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

We Respond to Investigations & Legal Actions

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

Sandia will cooperate with government agencies responsible for investigating suspected violations of law. You must notify Legal and Audit and Ethics 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.

[*Policy LG004: Matters to refer to the Legal and Prime Contract Division*](#)

[*Policy IAEB004: Respond to and Support Audits Policy*](#)

Legal or Audit will help you review information before it is released to an external investigative organization.



We Report Violations of the Code of Conduct

You have many different channels to report violations or potential violations of the Code, including your manager, Human Resources, Employee & Labor Relations, Legal, Security, the Environment, Safety and Health organization, Counterintelligence, the Inclusion, Diversity, EEO & AA organization, the Office of Research & Development Excellence, and Ethics/EEO Advisory & Investigative Services, as appropriate.

You should take timely action to report violations or suspected violations of the following: the Code, a Laboratory policy, process, or directive, or a contract provision. You should also report if another Member of the Workforce asks you to violate a Sandia requirement.

Depending on the circumstances, failure to report noncompliance or misconduct may violate Sandia requirements. Remember that no unethical or illegal acts can be justified. Similarly, stating that those actions were directed by a higher authority in the organization does not justify violation of the Code, a Laboratory policy, process, or directive, or a contract provision.

You are encouraged to contact Ethics/EEO Advisory & Investigative Services to discuss any Code or policy question or concern. When faced with a Code or policy dilemma, it is always better to obtain guidance before acting.



Contact Ethics/EEO Advisory & Investigative Services (Ethics/EEO)

What can you expect when you contact Ethics/EEO?

- Your concern will be treated objectively and fairly.
- You will be treated with dignity and respect.
- You do not have to identify yourself, but you will be encouraged to if it will help to resolve your concern.
- Whether you identify yourself or not, your communication will be kept confidential to the extent possible.
- Due to privacy considerations, you will not be informed of the details of any discipline that may result from an investigation into your concerns.

Our Standard

- Sandia takes 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, management, or any employee concern organization 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

- When you speak up, it gives Sandia the opportunity to improve our overall culture and performance.

[Policy IAEB001: Refer Matters to Ethics/EEO Advisory and Investigative Services Policy](#)



**Sandia
National
Laboratories**



**U.S. DEPARTMENT OF
ENERGY**
NNSA
National Nuclear Security Administration

Sandia National Laboratories is a multimission laboratory managed and operated by National Technology and Engineering Solutions of Sandia LLC, a wholly owned subsidiary of Honeywell International Inc. for the U.S. Department of Energy's National Nuclear Security Administration under contract DE-NA0003525. SAND2023-044540