



# Code of Business Conduct



January 2023

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\*This Code and the standards herein do not constitute a contract of employment nor give rise to any contractual right to employee benefits or to other terms and conditions of employment.

## 1. Centrus Code of Business Conduct

Centrus Energy Corp. and each of its affiliates (collectively “Centrus” or the “Company”) will conduct business in strict compliance with all applicable laws, rules, and regulations; safely; and with the highest integrity and respect for our fellow employees, customers, and stakeholders. We have a duty to conduct our business affairs within both the letter and the spirit of the law. We will vigorously enforce our policies and practices to protect employee safety, public health, the environment, and our business reputation. We are dedicated to providing a safety conscious work environment in which employees are free to express concerns or report violations without fear of retaliation.



**“CENTRUS IS STRONGLY  
COMMITTED TO THE SAFETY AND  
SECURITY OF OUR EMPLOYEES AND  
THE SURROUNDING COMMUNITIES  
AS WELL AS MEETING CLIMATE AND  
NATIONAL SECURITY GOALS.”**

**Daniel B. Poneman**  
President and Chief Executive Officer

We are as equally committed to serving our employees, customers, and stakeholders by working to protect our environment and contributing to our nation and our communities through strong governance and leadership. Since 1998, Centrus has provided more than 1,750 reactor years of fuel – equivalent to 7 billion tons of coal. We are leading an effort to establish a domestic high assay low enriched uranium supply chain necessary to support deployment of advanced reactors to meet

the climate challenges. Likewise, we have diligently served our local communities through our charitable contributions and created high paying jobs in traditionally underserved communities.

The Code of Business Conduct (“Code”), together with the Company’s other policies and procedures, sets out the standards of conduct that the Company expects its directors, officers, managers, and employees (collectively, “Employees”) to follow.<sup>1</sup> Suppliers and other persons supplying goods and materials to, or on behalf of, the Company are expected to adhere to the Centrus Energy Corp. Supplier Principles of Business Conduct (which is available at: <http://www.centrusenergy.com/company/board-directors/corporate-governance>).

The Code of Business Conduct compliance program is in addition to other programs maintained by the Company (i) to ensure regulatory compliance, such as its program for compliance with U.S. export controls, or (ii) to ensure compliance with the applicable regulations of the U.S. Nuclear Regulatory Commission and the U.S. Department of Energy. Concerns regarding non-compliance with those programs can be submitted under this Code but should be referred to the Employees responsible for these other compliance programs.

## 2. Responsibilities

### (a) Employees

Every Employee is responsible for complying with applicable laws and regulations, the Code, and applicable Company policies and procedures. Every Employee is also responsible for

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<sup>1</sup>Contractor personnel, such as those hired to augment the Company’s staff, who by contract are obligated to comply with the Code shall, for purposes of the Code only, be treated as falling within the term “Employees” as used herein. This does not otherwise affect their status as contractors.

reporting any violations or potential violations by using any one of the many methods afforded by the Company, or as permitted by applicable law. Supervisors are responsible for communicating these standards to those whom they supervise, to ensure that they understand and abide by them, and to create a climate in which there can be free and open discussion of all issues. Annually, each Employee must read this Code and certify that he or she has read, understands, and agrees to comply with the Code; and has identified any potential Code violations and/or potential conflicts.

**(b) Business Conduct Committee**

To ensure continuing attention to matters of corporate compliance and standards of business conduct on the part of all Employees, the Company has established the Business Conduct Committee (“BCC”). The BCC is responsible for monitoring performance under the Code, periodically reviewing and revising the Code and compliance program, and addressing compliance issues.

The BCC is composed of three officers of the Company appointed by the Company’s Chief Executive Officer (“CEO”). The General Counsel shall be a permanent member and serves as the chair. The other officers of the Company shall rotate serving as the two remaining members of the Committee. The Committee reports directly to the CEO.

**Waivers**

A waiver of any provision of the Code for executive officers or directors of the Company may only be made by Centrus’ Board of Directors or one of its committees and will be disclosed as required under applicable Securities and Exchange Commission (“SEC”) rules. A waiver of any provision for any other Employee may only be made by the Company’s Business Conduct Committee.

**(c) Chief Compliance Officer**

The Senior Vice President, General Counsel, Chief Compliance Officer & Corporate Secretary is the Company’s Chief Compliance Officer (“CCO”). The CCO is responsible for ensuring that the Company has an effective Code of Business Conduct compliance program, periodically reviewing and recommending revisions to the Code and its compliance program, monitoring performance under the Code, and advising Centrus’ Board of Directors regarding compliance matters. The CCO will periodically update the Compensation, Nominating and Governance Committee of Centrus’ Board of Directors (“Compensation, Nominating and Governance Committee”) regarding the updates, implementation, and enforcement of the Code.

**(d) Director, Corporate Compliance**

The Director, Corporate Compliance is responsible for the management of the day-to-day implementation of the Company’s Code of Business Conduct compliance program. This includes overseeing and coordinating Code compliance training, conducting assessments of the Code of Business Conduct compliance program, providing guidance and advice on the Code and Code compliance issues, periodically reviewing and recommending revisions to the Code and the Company’s Code of Business Conduct compliance program, and assuring potential violations are appropriately examined and addressed (including conducting investigations as necessary). The Director, Corporate Compliance reports directly to the CCO and will periodically update the BCC

and the Compensation, Nominating and Governance Committee regarding Code compliance issues.

### **3. Freedom to Raise Concerns**

Employees are expected to help establish and maintain a work environment in which Employees are free to raise concerns and report violations or potential violations. Supervisors, in particular, must be mindful of their words and conduct to avoid creating an environment where subordinates may feel discouraged from freely and openly raising issues. Retaliating or taking any adverse action against anyone for raising, helping to resolve, or providing information concerning (i) any accounting, internal accounting controls, or auditing matter; (ii) any violation or potential violation of the Code; or (iii) any other compliance or safety issue, is strictly prohibited. All Employees are expected to assist in any Company review, examination, or investigation of any concern or issue, and to provide complete and accurate information to those conducting the review, examination, or investigation.

### **4. Reporting Violations or Concerns**

Every Employee must report any violation or potential violation of the Code and is strongly encouraged to raise any concerns he or she may have regarding compliance with the Code. Prompt reporting of violations or concerns will help Centrus prevent unsafe, illegal, or unethical behavior and resolve matters appropriately. All reports of violations or potential violations of the Code shall be appropriately addressed in accordance with the Company's policies and procedures. The Company strongly encourages Employees to make such reports to their supervisors. Supervisors will report violations or potential violations of the Code to the Employee Concerns Manager ("ECM") at their respective sites and ensure that such reports or concerns are appropriately addressed. Each ECM shall notify the Director, Corporate Compliance ("DCC") of such reports. (Employees also may report violations and potential violations directly to the ECM at their site or other Company officials, as noted in below.)

Retaliation for raising any concern is strictly prohibited.

An Employee shall immediately report any of the following:

- (a) A violation or potential violation of any nuclear safety, safeguards or security law, rule, regulation, or requirement;
- (b) A violation or potential violation of any Company nuclear safety, safeguards or security policy, or procedure and any other nuclear safety concern; or
- (c) Provision of false or misleading information or data.

If you have questions, you are urged to seek guidance from the appropriate organization. The following is a brief summary of various potential issues and the organization most likely to be equipped to provide guidance on these issues:

- (1) Human Resources: Issues involving employment, harassment, or discrimination;

- (2) Regulatory: Issues involving nuclear, and other regulatory matters;
- (3) Internal Audit: Issues involving financial statements and disbursement of funds;
- (4) Office of General Counsel: Issues involving securities law, antitrust law, international business, Foreign Corrupt Practices Act, export controls, intellectual property (including trade secrets), and confidentiality;
- (5) Corporate Compliance: Interpretation or advice concerning the Code and ethics issues such as conflicts of interest, gift giving/receiving, waste, fraud, abuse, and any other issue not listed above; and
- (6) Security: Issues involving physical security of employees or facilities, or concerns involving Insider Threats (as defined in Section 17).

Employees should include a sufficiently detailed description of the violation, potential violation, or concern, in order to allow it to be appropriately addressed. Employee reports and concerns will be handled as confidentially as possible. No Employee will suffer retaliation from the Company for raising a concern or reporting a violation or a potential violation.

There is an Employee Concerns Program applicable to all Company sites and each site has been assigned an ECM.

You can identify your site's ECM and obtain their contact information at: <https://centrusgcc.sharepoint.com/sites/policies/SitePages/Home.aspx>. While the Company believes that reporting concerns to your immediate supervisor is the most effective means of addressing concerns, any Employee may contact an ECM for assistance in addressing his or her issue. Anyone (Employee or non-Employee) may report a Code violation, potential violation, or other compliance issue to a site's ECM; to the Director, Corporate Compliance; or by utilizing the email or phone numbers established by the Company for such reports. Employees also may contact the CCO, any member of the BCC, or any other Company Officer or Director.

Anyone (Employee or non-Employee) who has a concern about Centrus' accounting, internal accounting controls, or auditing matters may communicate that concern directly to the Audit and Finance Committee of Centrus' Board of Directors ("Audit and Finance Committee"). Such communications may be confidential or anonymous, and may be submitted in writing, by email or reported by phone to the address or number listed on page 26, or through a toll-free Hotline number published on the Company's website and at the end of this document. Concerns relating to accounting, internal accounting controls, or auditing matters will be sent promptly to the Audit and Finance Committee, and as appropriate, will simultaneously be reviewed and addressed by the Director, Internal Audit in the same way that other concerns are addressed by the Company. If a supervisor or manager receives a concern about Centrus' accounting, internal accounting controls, or auditing matters, he or she will immediately notify the Director, Internal Audit.

### **Right to Report to the NRC and Other Authorities**

Every Employee has the absolute right to report any nuclear safety, safeguards, or security concern directly to the NRC, or to any other responsible regulatory authority. This right includes participation in any state, federal, administrative, judicial, or legislative proceeding or investigation.

In addition to the reporting requirements for violations of the Code of Business Conduct, Employees have an obligation to report allegations of fraud, waste, abuse, misuse, corruption, criminal acts, or mismanagement relating to DOE programs, operations, facilities, contracts, or information technology systems to the appropriate authority. The appropriate authority can include the Site Facility Security Officer, law enforcement, or the Department of Energy Office of Inspector General (see page 27 for DOE OIG Contact Information).

Contact information for reporting violations, potential violations or concerns is provided on the Company's website ([www.centrusenergy.com](http://www.centrusenergy.com)) and the Company intranet.

On a quarterly basis, the Director, Internal Audit will provide an update to the Audit and Finance Committee on the status of concerns regarding Centrus' accounting, internal accounting controls, or auditing matters. The Audit and Finance Committee also may direct that certain matters be presented to it or to the full Centrus Board, and may direct special treatment, including the retention of outside advisors or counsel, for any concerns addressed to them.

Supervisors will notify the ECM at their respective sites of all reported Code violations or concerns, and the ECM will report the status of these concerns to the Director, Corporate Compliance. The Director, Corporate Compliance will periodically, but no less than quarterly, update the BCC on the status of these concerns. The CCO or the Director, Corporate Compliance may report any violations or potential violations of the Code directly to the CEO if they believe circumstances warrant. The CCO and the Director, Corporate Compliance also will update quarterly, the Compensation, Nominating and Governance Committee on the status of these concerns.

While Centrus prefers internal disclosure to an Employee's supervisor, this preference is not intended to discourage or prohibit an Employee from reporting a nuclear safety, safeguards, or security concern directly to the NRC or any other responsible regulatory authority. Rather, it is the Company's and the NRC's belief that concerns raised internally can be addressed more quickly and efficiently and preserve safety more effectively. To address the concern, the supervisor may involve or consult with other subject matter departments, as necessary. Retaliation or retribution of any kind (including discharge, discipline, or discrimination in compensation, terms, conditions, or privileges of employment) for internal or external disclosure of a nuclear safety, safeguards, or security concern, or engaging in other protected activity, will not be tolerated.

## **5. Ethics**

Employees shall adhere to the following principles of ethics in their daily responsibilities:

- (a) Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships;
- (b) Ensure the Company is able to provide constituents, including shareholders, information that is full, fair, accurate, timely, and understandable via public communications or the reports the Company files with, or submits to, the SEC;
- (c) Comply with laws, rules and regulations of federal, state, and local governments, and other appropriate private and public regulatory agencies;

- (d) Act in good faith, responsibly, with due care, competence, and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated;
- (e) Respect and protect the confidentiality of information acquired in the course of work, except when authorized or otherwise legally obligated to disclose it, including the disclosure or reporting of violations or potential violations of, or concerns regarding, nuclear safety, safeguards, security or other matters (see, for example, Section 4 “Reporting Violations or Concerns” and Section 19 “Defend Trade Secrets Act”);
- (f) Ensure that confidential information of the Company or others, acquired in the course of work, is not used for personal advantage;
- (g) Share knowledge and maintain skills important and relevant to constituents’ needs;
- (h) Proactively promote ethical behavior as a responsible partner among peers in the work environment; and
- (i) Act responsibly in the use of, and control over, all assets and resources.

## **6. Fair Employment Practices/Policy Against Harassment**

Centrus is committed to fair employment practices, including the prohibition against all forms of discrimination prohibited by law. This includes maintaining a work environment free of harassment directed at a person because of his or her race, color, religion, national origin, gender (including pregnancy), sexual orientation, gender identity, age, disability, veteran status, or other characteristic protected by law.

Among other things, this policy prohibits sexual harassment, *i.e.*, unwanted verbal or physical conduct of a sexual nature. Centrus will recruit, hire, train, compensate, promote, and provide other conditions of employment, without regard to a person’s race, color, religion, national origin, gender (including pregnancy), sexual orientation, gender identity, age, disability, veteran status, or other characteristic protected by law. Discrimination and harassment are strictly prohibited and will not be tolerated.

The Company will follow the applicable labor and employment laws wherever it operates, including observing those laws that pertain to fundamental human rights, including freedom of association, privacy, recognition of the right to engage in collective bargaining, and the prohibition of forced, compulsory, or child labor.

## **7. Conflicts of Interest**

Employees have a duty to avoid financial, business, or other relationships that might be opposed to the interests of Centrus or might cause a conflict with the performance of their duties. Employees should conduct themselves in a manner that avoids even the appearance of conflict between their personal interests and those of the Company.

A conflict-of-interest situation may arise in many ways. Examples include the following:



- (a) Employment by a competitor, regardless of the nature of the employment, while employed by Centrus, or engaging in any activity that aids a competitor of Centrus;
- (b) Placement of Centrus business with a firm owned or controlled by an Employee or his or her family member, or in which an Employee or his or her family member has an interest;
- (c) Receipt by an Employee or his or her family member of benefits from any supplier, customer or other party with whom the Company does, or intends to do, business (e.g., product discounts, free or reduced-rate services, or low-interest loans) that are not available to the general public;
- (d) An Employee or his or her family member having substantial ownership of, or interest in, a company that is a competitor or a supplier;
- (e) An Employee or his or her family member acting as a consultant to a Centrus customer or supplier;
- (f) Allowing close personal relationships to bias Employee objectivity in personnel decisions or to influence relationships with customers, competitors, or suppliers; or
- (g) Affiliating with, or participating in, any outside organization whose activities could create any conflict of interest or appearance of conflict of interest, that could damage the Company's reputation.

### **Procurement Integrity**

It is illegal to make, directly or indirectly, any offer or promise of future employment or business opportunity to federal procurement officials who are personally and substantially involved in a government procurement in which the Company is, or plans to be, a bidder or offeror.

Employees must adhere to laws and regulations in relationships with, or applicable to, former federal government employees, former military personnel, former members of Congress, and Congressional staff and employees that impose restrictions on the duties they may perform for the Company, whether as consultants or employees.

Apparent conflicts of interest can easily arise. Any Employee who feels that he or she may have a conflict situation, actual or potential, should

report all pertinent details to his or her supervisor, Human Resources, or the Director, Corporate Compliance. Supervisors and Human Resources will notify the Director, Corporate Compliance of any reported potential conflicts.

## **8. Entertainment, Gifts, and Payments**

The sale of Centrus products and services should always be free from even the inference or perception that favorable treatment was sought, received, or given on the basis of the furnishing

or receipt of gifts, entertainment, favors, hospitality or other gratuities. Similarly, the purchase of supplies, materials, and services from vendors, suppliers, and subcontractors must be accomplished in a manner that preserves the integrity of the procurement process.

(a) Relations with Government Employees:

- (i) U.S. federal, state, and local government executive, legislative, and judicial branches, departments, and agencies are governed by laws and regulations concerning acceptance by their employees of entertainment, meals, gifts, favors, hospitality, gratuities, and other things of value from firms and persons with whom those departments and agencies do business, or over whom they have regulatory authority. It is the policy of Centrus to prohibit its Employees from giving, or offering to give, items to government employees in violation of the applicable government gift limitations, and to ensure compliance, Centrus has adopted the Centrus Energy Corp. Gifts and Entertainment Policy (“Company Gift Policy”) that Employees must follow. There are, however, permissible exceptions within these laws and regulations. Since these exceptions are narrowly construed and subject to change or deletion, any question concerning them should be referred to the Director, Corporate Compliance.
- (ii) Employees may not make or guarantee loans, or make payments, to federal, state, or local government employees.
- (iii) Employees may entertain socially with any relatives or friends employed by government agencies consistent with applicable laws and regulations. It should be clear, however, that the entertainment is not related to the business of Centrus. No expenditure for such social entertainment is reimbursable by the Company to the Employee.
- (iv) U.S. federal law, including the FCPA, prohibits giving or offering anything of value, either directly or through agents, to foreign officials (including officials of government owned corporations), foreign political parties, or candidates for foreign political office for the purpose of improperly influencing an official decision, or to secure an improper advantage in order to obtain or retain business. The FCPA further prohibits giving money or anything of value to

**Kickback and Bribing  
Prohibited**

Centrus prohibits, directly or indirectly, offering, giving, soliciting, or receiving any form of bribe or kickback. These may be criminal acts.

**The FCPA**

Centrus will scrupulously adhere to the letter and spirit of the Foreign Corrupt Practices Act.

any person or firm when there is reason to believe that it will be passed on to a foreign official for this purpose. Similar restrictions may apply under the laws of foreign countries.

Employees must first review the Company's Gift Policy in any situation which a gift will be given, or anything of value provided, directly or indirectly, to government officials (which includes officials of government-owned companies), and must also discuss such situations with the Office of General Counsel prior to giving anything of value such as gifts, gratuities, favors, hospitality, meals, refreshments, or entertainment, which could be subject to the FCPA or other law.

(b) Relations with Non-Government Personnel:

- (i) Furnishing meals, refreshments, or entertainment in connection with business discussions with non-government personnel is an acceptable business practice as long as it does not violate the standards of conduct of the recipient's organization, are not lavish, extravagant, or frequent and complies with the Company Gift Policy and applicable law. Further, giving items of reasonable value, including items branded with Centrus' name, as business gifts is also permitted under limited circumstances set forth in the Company Gift Policy. (For further information, Employees should consult the Company Gift Policy.)
- (ii) Employees who make, and supervisors who approve, expenditures for gifts, meals, refreshments, or entertainment must use discretion and care to ensure that such expenditures are in the proper course of business, consistent with Centrus policy, and could not reasonably be construed as bribes or improper or illegal inducements.

(c) Receipt of Items by Centrus Employees:

- (i) Employees may accept meals, refreshments, or entertainment offered in connection with business discussions, consistent with accepted business practice unless such meals, refreshment, or entertainment (A) are lavish, extravagant, or frequent; (B) would, if accepted, violate applicable law; or (C) are offered under circumstances that might be interpreted as an attempt to secure a favor from the Employee in the exercise of his or her responsibilities for Centrus.
- (ii) It is the personal responsibility of every Employee to ensure that his or her acceptance of such meals, refreshments or entertainment is proper and reasonable. Employees should consult the Company Gift Policy for further guidance.
- (iii) Other than the permitted business meals, refreshments, or entertainment mentioned above in (i), Employees shall not accept personal gifts (e.g., services; travel; accommodations; tickets to sporting, recreation, theater) that exceed \$100 (\$25 limit for money equivalents (e.g., a gift card)) from

individuals, firms, or representatives of firms who have, or may have, business relationships with Centrus, without written permission from the Employee's supervisor at the Vice President level or above, and in no event shall Employees accept any gift that would, if accepted, violate applicable law or that is intended, or has the appearance of, exerting undue influence on the Employee in the exercise of his or her responsibilities for the Company. Detailed guidance, including reporting requirements for tangible gifts received by Employees, can be found in the Company Gift Policy.

Employees may not, under any circumstances, accept money of any amount from anyone relating to Centrus business.

- (iv) Documentation requirements for gifts can be found in the Company Gift Policy. For example, subject to exceptions listed in the Company Gift Policy, Employees must report to the Company all gifts given or received by the Employee so that the gifts can be listed in a gift registry maintained under the Company Gift Policy.
- (v) If an Employee is involved in the procurement process, he or she should follow the standards set out under Section 9, "Bidding, Negotiation, Due Diligence and Contract Performance" and the Company Gift Policy.
- (vi) Should circumstances arise where gifts that exceed the limits in the Company Gift Policy are offered or received and cannot be declined or returned without insulting the giver or jeopardizing the business relationship, such gifts shall be accepted on behalf of Centrus and turned over to Human Resources for proper disposition.
- (vii) Except for loans by recognized banks and financial institutions that are generally available at market rates and terms, an Employee or his or her family member may not accept a loan, guarantee of loan or payment from an individual or firm doing or seeking business with Centrus.
- (viii) Employees should report to their supervisor or Human Resources any instance in which they are offered money, gifts, meals, refreshment, or entertainment by a supplier or prospective supplier of Centrus that exceed(s) the standards described in this Code or in the Company Gift Policy. Supervisors or Human Resources should then report that information to the Director, Corporate Compliance, or the CCO. Even where the gift does not exceed these standards, Employees should consult the Company Gift Policy for requirements to report gifts received.

## **9. Bidding, Negotiation, Due Diligence, and Contract Performance**

In the highly competitive environment in which Centrus operates, Centrus is committed to

compete fairly and ethically for all business opportunities and comply fully with applicable law. No Employee shall provide or attempt to obtain, from any source, information that is national security-classified or procurement-sensitive (see Section 15 “Classified Matter Protection” and Section 16 “Protection of Proprietary and Sensitive Information”), or any information regarding a competitor, in circumstances where there is reason to believe the release or receipt of such information is unlawful or otherwise prohibited.

Centrus requires all of its procurement and sales activities to be conducted in accordance with all applicable laws and regulations, including those set forth in the Company’s policies and procedures. These include:

- (a) Avoiding any conflict of interest that may be caused by contractors, consultants, agents, or individuals providing procurement or consulting services, that would impair Centrus’ ability to maintain, or cause Centrus to jeopardize, its objectivity in the procurement process; and
- (b) Not soliciting or accepting any money, gratuity, employment opportunity, or other thing of value during the procurement process (whether for the direct benefit of the Employee, a member of the Employee’s family, or another person with a close personal relationship with the Employee), in violation of Company policies and procedures.

Centrus is fully committed to compliance with U.S. sanctions laws, such as those administered by the U.S. Office of Foreign Assets Control, and regulations and applicable anti-bribery legislation, including the U.S. Foreign Corrupt Practices Act, and shall not transact business with persons debarred from contracting with the U.S. government or denied export privileges. Centrus has adopted policies to meet this commitment in connection with Company business. Employees engaged in negotiating or implementing any contract between Centrus and a third party shall ensure that the third party, the proposed terms and the implementation of the contract (including payments) are reviewed in accordance with these Centrus policies. This is an ongoing obligation that does not end when transaction documents are signed.

Personnel involved in negotiating contracts, whether for sale, purchase, lease, or otherwise, shall (i) be responsible for the truth and accuracy of all statements, communications and representations made by them to customer or supplier representatives, and (ii) seek confirmation (in the contract or otherwise) of the truth and accuracy of material statements or representations made by the customer or supplier representatives that will be relied upon by the Company in entering into the contract.

Care must be taken to ensure proper recording and charging of all costs to the appropriate account, regardless of the status of the budget for that account. The falsification of

timecards or other cost records will not be tolerated. Every Employee and supervisor is personally responsible for ensuring that their time is recorded promptly, accurately, and in accordance with Company policies and procedures. Employees are also prohibited from submitting, or concurring

Every Employee and supervisor is personally responsible for ensuring that their time is recorded promptly, accurately, and in accordance with Company policies and procedures.

in the submission of, any claims, bids, proposals, or any other documents of any kind, that are false, fictitious, or fraudulent. Such acts may be criminal violations, which could result in criminal prosecution of the Company and the Employee involved.

Supervisors must be careful, in words and conduct, to avoid placing, or seeming to place, pressure on subordinates that could cause them to deviate from the guidance and expectations of the Code.

By policy and practice, Centrus is dedicated to developing, producing, and furnishing, products and services of the highest quality, and products and services that meet or exceed the requirements of customers. The customer has the right to expect, and we have an obligation to ensure, that such products and services are delivered on fair terms. This can be accomplished only by a continuing dedication by Centrus and its Employees to fair negotiation, and a strict adherence to all contractual obligations.

## **10. Nuclear Safety, Safeguards, and Security**

Employees must conduct all work activities in a manner that will ensure the health and safety of themselves, fellow Employees, and the public. To that end, work activities must comply with all applicable nuclear safety, safeguards, and security requirements, particularly Section 211 of the Energy Reorganization Act of 1974 and 10 CFR 708, and regulations promulgated by the Nuclear Regulatory Commission (“NRC”) and DOE. Compliance will be ensured through:

- (a) Following applicable policies and procedures;
- (b) Vigilant self-monitoring;
- (c) Encouraging disclosure of concerns;
- (d) Training; and
- (e) Personnel discipline, if needed.

## **11. Workplace Safety**

Centrus is committed to creating a safe, healthy, and productive work environment for all Employees. Employees are required to comply with all safety and health-related statutes and regulations, as well as Company policies regarding safety and health. These statutes, regulations, and policies require safe workplace conditions, free of recognized hazards and unsafe work practices.

An Employee should report any workplace safety concerns to a supervisor. The failure to abide by workplace safety laws and regulations could subject Employees to an unsafe work environment and Centrus and responsible Employees to significant civil and criminal liabilities.

## 12. Alcohol and Substance Abuse

All Employees at any site owned or controlled by Centrus or the Department of Energy (“DOE”) are prohibited from the use, possession, manufacture, sale or distribution of any illegal substance or non-prescription controlled substance (“Prohibited Drug”) at any time, on or off duty. Employees also are prohibited from the misuse or abuse of prescription medication, and/or over-the-counter drugs or alcohol that could directly or indirectly affect judgment on the job and must report to work free from the influence of alcohol or illegal drugs and remain free from their influence at all times while on duty, including during meals and other work breaks. Violation of this policy will result in discipline up to and including termination of employment.

### Prohibited Drugs

Prohibited Drugs include marijuana, whether for medicinal purposes and/or recreational use, regardless of legalization under any state or local law.

Prohibited Drugs include, but are not limited to, (a) narcotics, depressants, cocaine, amphetamines, and hallucinogens; and (b) marijuana (including cannabis and hemp), whether for medicinal purposes and/or recreational use, regardless of legalization under any state or local law.

Employees, who in the course of their job responsibilities entertain or represent Centrus at business-related meals and social events with customers or other third parties where alcohol is served as part of such events, may consume alcohol at such events provided that consumption is in moderation and occurs in a manner consistent with remaining fit for duty during such business events and thereafter for so long as the Employee is on duty.

## 13. Environmental Concerns

Centrus recognizes its obligation to conduct its operations in a way that promotes and preserves a clean, safe, and healthful environment and complies with all federal, state, and local laws and regulations. To that end, Centrus is committed to the following:

- (a) Eliminating the release of any substance that may cause environmental damage;
- (b) Minimizing the creation of waste;
- (c) Disposing of all waste through safe and responsible methods;
- (d) Minimizing environmental risks by employing safe technologies and operating procedures; and
- (e) Being prepared to respond appropriately to accidents and emergencies.

The violation of environmental laws may subject Centrus and responsible Employees to civil and criminal liability. Any Employee with knowledge of any spill, impermissible release of a hazardous substance, or non-compliance with any applicable environmental laws, regulations, or permits must immediately report it in accordance with applicable site procedures and guidance.

## 14. Use of Centrus Property

Centrus' equipment (including portable digital equipment, such as Company-issued laptops, tablets, and cellular phones) and Centrus' networks (including Company-provided internet access) are intended for business activities. Incidental personal use of such equipment and networks by Employees is permissible so long as it does not:

- (a) Consume more than a trivial amount of resources;
- (b) Interfere with staff productivity;
- (c) Preempt any business activity;
- (d) Violate Centrus policies, including, but not limited to, the Centrus policy on Fair Employment Practices/Policy Against Harassment (see Section 6); or
- (e) Involve any illegal activity.

Employees shall ensure that the use of Company resources, including email, should never create either the appearance or the reality of inappropriate use. At no time, should Employees access, forward, download, or save offensive information or materials or otherwise visit offensive internet sites. This includes, without limitation, pornography of any kind.

Any Employee who wants remote access to email or the Company's network should use the remote access capabilities provided by Centrus' Information Technology organization.

### No Expectation of Privacy

There is no expectation of privacy when using Company-issued equipment or networks. Centrus reserves the right to monitor activity involving such equipment and networks.

Company equipment and networks are the property of Centrus. There is no expectation of privacy when using Company-issued equipment or networks. Centrus reserves the right to monitor activity involving such equipment and networks, and third parties, including governmental authorities, also may monitor such activity where authorized pursuant to applicable law.

Similarly, where permitted by applicable law, Centrus facilities and associated areas (such as parking lots and entrance/egress points, including areas leased from others), may be subject to electronic and other monitoring to ensure safety and protection of government and private property and information. Those who are present in Centrus property and work areas are deemed to consent to this monitoring.

Employees should consult the Centrus Energy Corp. IT Enterprise Network Security Policy for further information regarding all the Company's policies on digital equipment and networks. Noncompliance with these policies may result in disciplinary action including suspension, termination and/or referral for criminal prosecution.



## **15. Classified Matter Protection**

Certain Employees with appropriate security clearances and the need-to-know deal with information deemed classified pursuant to the Atomic Energy Act of 1954, as amended, Presidential Executive Orders, and/or other laws or regulations (“Classified Matter”) in the course of their work. Classified Matter must display markings or combinations of markings which may include, (i) Top Secret, Secret, or Confidential (classification levels); (ii) Restricted Data, Formerly Restricted Data, and National Security Information (categories of classified information), or (iii) other designations permitted or required by applicable regulations and procedures. Employees and contractors are prohibited from disclosing Classified Matter to unauthorized persons. Unauthorized access to, or disclosure of, Classified Matter is prohibited by federal law.

The handling of Classified Matter is strictly controlled under federal law. The receipt, maintenance, storage, distribution, and destruction of Classified Matter must be performed in accordance with federal law and applicable policies, procedures, and guidance. In all cases, Employees accessing Classified Matter must have the appropriate access authorization (clearance) and, a demonstrated “need-to-know” the information.

All Employees shall comply with applicable laws and regulations and Centrus policies and procedures for the protection of Classified Matter. Details on Centrus’ Classified Matter Protection and Control Policy can be found on [Centrus Corporate Portal/Information/Policy \(sharepoint.com\)](#). Questions or concerns relating to the handling of Classified Matter should be discussed with a local authorized Derivative Classifier, the local Security organization, or, where applicable, the Classification Officer.

Employees shall report to their site Facility Security Officer and their supervisor any attempt by any person to obtain unauthorized access to Classified Matter and/or any mishandling of Classified Matter.

Employees shall comply with the DOE Classification Bulletin Gen-16 “No Comment” policy (found on [www.energy.gov](http://www.energy.gov)) at all times unless given specific permission to discuss a sensitive topic in a potentially classified subject area in an unclassified manner.

## **16. Protection of Proprietary and Sensitive Information**

Centrus has various categories of proprietary and sensitive information including, but not limited to, the following:

- (a) Centrus Proprietary Information which (whether or not marked as “Proprietary Information”) includes all non-public information such as business and marketing plans, non-public financial information, marketing and sales information, production and financial information, customer and Employee records, research and technical information, contract, product, or services information;
- (b) Proprietary information which (whether or not marked as “Proprietary information”) includes non-public information obtained from a third party by the Company under a duty of confidentiality;
- (c) Trade Secrets;

- (d) Controlled Unclassified Information (CUI)<sup>2</sup> including:
  - (i) Export Controlled Information (ECI);
  - (ii) Unclassified Controlled Nuclear Information (UCNI);
  - (iii) Safeguards Information (SGI);
  - (iv) Security-related Sensitive Information (SRSI); and
  - (v) Personal Identifying Information (PII).

All Employees shall comply with applicable laws and regulations and Centrus policies and procedures for the protection of sensitive unclassified information. Requirements of Centrus' Protection of Unclassified Information and Identification Policy can be found at [UCP 01-2007 Unclassified Information Identification and Protection Policy.pdf \(sharepoint.com\)](#). Among other requirements, Employees are required to treat this information as confidential, and are responsible for protecting and properly handling any such information in accordance with U.S. laws and regulations, and applicable Centrus policies and procedures. Employees may not disclose or use such information except as authorized by such laws, regulations, and applicable Centrus policies and procedures.

Employees shall report to their site Facility Security Officer and their supervisor any attempt by any person to obtain unauthorized access CUI held by Centrus. Further, to ensure protection of CUI and in addition to the reporting requirements imposed on Employees who hold security clearances, the following shall apply to interactions with persons or entities in or from sensitive countries:

- (e) All Employees (even those without security clearances) travelling outside of the United States for business or personal reasons must report such travel in advance to their site Facility Security Officer. If travel is to a country designated level III or IV by the U.S. Department of State or involves travel to or meetings with individuals from such countries or working for entities from such sensitive countries, the Facility Security Officer will provide guidelines for additional reporting.
- (f) The most senior Centrus participant or their designee in any in-person meeting or in any phone or video call with persons from a sensitive country or working for an entity from a sensitive country must submit a summary of that meeting, phone or video call to their site Facility Security Officer. (Employees should contact their site Facility Security Officer for any applicable exemptions).
- (g) Employees holding security clearances are subject to additional travel and other reporting requirements as required by DOE regulations.

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<sup>2</sup> As used here, the term CUI is broadly defined to include both information categorized as "CUI" by the U.S. government in applicable regulations and orders (such as DOE Order 471.7, *Controlled Unclassified Information*, but also unclassified information falling outside the U.S. government's definition of CUI, including Company proprietary information, that under U.S. law or regulation is subject to protection from disclosure (such as information referred to as "Company Controlled Information" under other Company policies).

A list of sensitive countries can be found at <https://centrusgcc.sharepoint.com/sites/HQSecurity/Shared%20Documents/DOE%20CI%20ORFO%20Sensitive%20Country%20List%205-29-14.pdf>, or from the Employee's site Facility Security Officer.

## **17. Insider Threats**

Employees are the first line of defense against Insider Threats.

An "Insider Threat" is a threat that an Employee, contractor or other person with access to Classified Matter described in Section 15 and/or proprietary and sensitive information described in Section 16 that could use that access to compromise the information, harm U.S. national security interests, undermine the commercial, financial or legal interests of the Company, its customers or suppliers, or violate the privacy of Employees or other individuals. An Insider Threat may exist even where the individual posing such a threat does not intend to compromise or harm such interests, such as where an individual lacks sufficient training or skill to protect the information under his or her control or has not been informed of the steps that must be taken to protect Classified and Controlled Unclassified Information.

Employees may report Insider Threats in multiple way, including, to their site Facility Security Officer, site Employee Concerns Manager or other official(s) designated by Company policies, or their supervisor any actual or suspected Insider Threat. Reports can also be made anonymously on the Company Employee Concerns hotline or [ITP@centrusenergy.com](mailto:ITP@centrusenergy.com). For more detail about the Company's Insider Threat Program, refer to the Insider Threat Policy.

## **18. Foreign Ownership, Control or Influence**

To meet obligations under its contracts and agreements with the U.S. government as well as applicable U.S. law, the Company must report to the U.S. government any circumstance relevant to whether the Company or any of its affiliates are under "foreign ownership, control, or influence" ("FOCI"). A U.S. company is considered to be under FOCI when a foreign interest has the power, direct or indirect, whether or not exercised, to direct or decide matters affecting the management or operations of the company in a manner which may result in unauthorized access to classified information or may affect adversely the performance of government contracts. The relevant circumstances can be found in the U.S. government's Standard Form 328, "Certificate Pertaining to Foreign Interests", which is available at <https://www.gsa.gov/forms-library/certificate-pertaining-foreign-interests>.

On a regular basis, the Company is required to record, compile, maintain, and submit information to the U.S. government agencies responsible for making FOCI determinations. All Employees who prepare or submit this information to these agencies shall do so diligently and with the highest degree of accuracy and integrity. Further, any Employee who becomes aware of any change in facts or circumstances that may indicate or demonstrate a capability on the part of foreign persons to control or influence the operations or management of the Company or its subsidiaries must report those changed facts or circumstances to their site Facility Security Officer and their supervisor.

## 19. Defend Trade Secrets Act

Employees are hereby notified that, pursuant to the Defend Trade Secrets Act, 18 U.S.C. § 1833, signed into law in 2016:

- (a) An Employee will not be held criminally or civilly liable under any federal or state trade secret law for any disclosure of a trade secret that:
  - (i) is made:
    - (A) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and
    - (B) solely for the purpose of reporting or investigating a suspected violation of law; or
  - (ii) is made in a complaint or other document that is filed under seal in a lawsuit or other proceeding.
- (b) If the Employee files a lawsuit for retaliation by Centrus for reporting a suspected violation of law, the Employee may disclose Centrus' trade secrets on a confidential basis to the Employee's attorney and use the trade secret information in the court proceeding if the Employee:
  - (i) files any document containing the trade secret under seal; and
  - (ii) does not disclose the trade secret, except pursuant to court order.

## 20. Compliance with Export Control Laws

As a business dealing in nuclear materials and sensitive technologies, Centrus is subject to export control regulations relating to the export of materials and information, including nuclear materials and information concerning the enrichment of uranium. Centrus provides enriched uranium product and other nuclear materials or related services only to foreign customers whose governments cooperate with the United States government in that regard.

Without a license, Export Controlled Information may only be disclosed to a U.S. citizen or green card holders with a need-to-know in the United States.

Centrus is committed to compliance with all applicable regulations relating to the export of materials and information. These include:

- (a) Licensing requirements for export of nuclear materials and other controlled commodities to a foreign country;
- (b) The tracking of nuclear materials through the Nuclear Materials Management and Safeguards System (NMMSS); and

- (c) Restrictions on disclosing information to foreign entities and persons even if they are located within the borders of the United States or have a visa allowing them to reside or work in the United States.

Employees are responsible for complying with all applicable laws and regulations, and Centrus policies, procedures, and guidance, prior to exporting any goods or services from the United States or providing any non-public, technical information concerning export-controlled technology to any person or entity either in the United States or outside the United States. Employees must also comply with applicable Centrus policies and procedures governing the handling and protection of such goods, services or information. Questions or concerns relating to the goods, services, or information which may be subject to export control may be submitted to the Company's Export Control Coordinator, the local Security organization, or, if applicable, the site Facility Security Officer or Classification Officer. Please refer to the Export Control Compliance Policy for more information.

## **21. Complete and Accurate Books, Records, and Financial Statements**

Applicable laws and regulations establish the following requirements with regard to record-keeping and communications:

- (a) Centrus' financial statements, and all books and records on which they are based, must accurately reflect all transactions of the Company in accordance with generally accepted accounting principles in the United States.
- (b) All receipts and disbursements of funds must be properly and promptly recorded.
- (c) No undisclosed or unrecorded fund may be established for any purpose.
- (d) No false or artificial statements or entries may be made for any purpose in the books and records of Centrus, or in any internal or external correspondence, memoranda, or communication of any type, including telephone, email, or fax.
- (e) Each Employee should report to his or her supervisor (i) any significant deficiencies in the design or operation of any internal control that could adversely affect Centrus' ability to record, process, summarize, and report financial data; (ii) any material weaknesses in internal controls; and (iii) any fraud, whether or not material, that involves management or other Employees who have a significant role in Centrus' internal controls, of which the Employee becomes aware. Employees and non-Employees may also report such issues as described in Section 4, "Reporting Violations or Concerns." Penalties for violations in this area could be severe for the Company as well as the Employee(s) involved.

## **22. Safeguard and Preservation of Assets**

Each Employee is charged with the duty to safeguard and preserve Centrus' assets. Assets include:

- (a) Cash, receivables, and inventory;
- (b) Property, plant, and equipment;

- (c) Equipment or inventory furnished by customers or suppliers;
- (d) Intellectual property (including patents, trademarks, and copyrights);
- (e) Trade Secrets; and
- (f) Proprietary information.

Employees are expected to protect sensitive US Government information and technology in accordance with Federal law and Centrus policies and procedures. This includes handling, transporting, or shipping of both sensitive unclassified information as described in Section 20 and classified information as described in Section 15.

Employees are prohibited from taking for themselves a corporate opportunity discovered through the use of Centrus property, information, or position. Employees are also prohibited from using Centrus property, information, or position for personal gain, or otherwise competing with Centrus.

## 23. Compliance with Securities Laws and Regulations

Generally speaking, Centrus is required by the SEC and the New York Stock Exchange to make prompt public disclosure of “material information” regarding the Company. Information is “material” if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision.

There will be occasions when an Employee knows important information affecting Centrus’ activities that has not yet been publicly released. In such cases, the information must be held in the strictest confidence by any Employee involved. In addition, it is a violation of federal

law to purchase or sell a company’s securities while in possession of such material non-public information. Employees may not buy or sell Centrus securities while in possession of material non-public information, or provide such information to family, friends, or third parties. This includes all varieties of stock, including the cashless exercise of stock options. Employees (except those who are expressly authorized) also may not participate in discussions with other parties, directly or via electronic means, about Centrus’ prospects, or the prospects of Centrus’ stock, while in possession of material non-public

### No Insider Trading

Employees may not buy or sell (a) Centrus securities while in possession of material non-public information or (b) securities of other companies about which they have material non-public information obtained in the performance of their duties with Centrus. Moreover, in accordance with the Insider Trading Policy, special additional trading restrictions apply to all directors of the Company and its executive officers.

information. Prior to buying or selling Centrus’ securities, Employees should consult the Centrus Energy Corp. Securities Trading and Confidentiality Policies and Procedures (the “Insider Trading Policy”). Certain Employees must get pre-clearance before trading, as spelled out in the Insider

## Trading Policy.

Employees are prohibited from entering into short sales or purchasing financial instruments (including prepaid variable forward contracts, equity swaps, put or call options, collars, and exchange funds) that are designed to hedge or offset any change in the market value of Centrus stock, regardless of whether the Employee possesses material non-public information. This applies to all Centrus stock held, directly or indirectly, by the Employee, including Centrus stock granted to the Employee by Centrus as part of the compensation of the Employee. Employees should consult the Insider Trading Policy for further guidance.

## **24. Compliance with Antitrust Laws**

Antitrust laws of the United States prohibit agreements or actions “in restraint of trade.” Agreements or actions in restraint of trade are those restrictive practices that may reduce competition without providing beneficial effects to consumers. Agreements or understandings involving two or more parties that do the following have been found to violate U.S. antitrust laws:

- (a) Fix or control prices;
- (b) Boycott specified suppliers or customers;
- (c) Allocate products, territories, or markets; or
- (d) Limit the production or sale of products or product lines.

Many foreign countries or organizations (such as the European Union) with which Centrus does business also have antitrust laws that prohibit these and other types of anti-competitive behavior. Employees should never discuss or engage in such behavior with representatives of other companies or persons, nor work through third parties to propose or agree to such behavior with any other company or person. Further, non-public information about Centrus’ costs or prices, or its future plans for sales in the market, should never be shared with a competitor of Centrus. Such information may not be shared with any non-competitor third parties unless authorized pursuant to a confidentiality agreement that has been reviewed and approved by the Office of the General Counsel. Employees should report to their supervisor, any instance in which any of the discussions of the matters referred to above are initiated by other companies, directly or indirectly. Supervisors must promptly notify the Director, Corporate Compliance of any such report.

Antitrust laws also prohibit certain conduct taken unilaterally by Centrus that constitutes a restraint of trade or unfair business practices. Because of the complexity of antitrust laws, it is imperative that advice be sought from the Office of General Counsel on any question regarding this subject.

## **25. International Business**

In addition to U.S. federal laws relating to improper influence of foreign official (see Section 8, “Entertainment, Gifts, and Payments”), U.S. federal law also prohibits any action or agreement that supports the Arab boycott of Israel or any unsanctioned boycott of a country that is friendly to the United States. Employees involved in Centrus business in the Middle East should be especially alert to requests in contracts and similar documents for information about the Company’s relations with Israel. Do not respond to or even acknowledge receipt of such a request.



Contact the Office of General Counsel if you receive any such requests, as they must be reported by Centrus to the U.S. Department of Commerce.

U.S. federal law also prohibits doing business with, and/or imposes sanctions on, certain countries, entities or persons. These prohibitions and sanctions are applied to countries, entities,

Without exception, Centrus is firmly opposed to child labor, forced labor, and human trafficking and complies with applicable laws prohibiting such exploitation.

or persons for a number of reasons, including involvement in terrorism, narcotics trafficking, or proliferation of weapons of mass destruction. Employees shall ensure that any proposed transactions or dealings with foreign persons on Centrus' behalf are screened to ensure compliance with these laws.

Employees involved in Centrus' international operations must be familiar with these laws and must ensure that any proposed transaction complies with them. If they are not familiar with these laws, they should consult the Office of General Counsel prior to negotiating any foreign transaction.

Centrus is committed to respecting all international human rights laws applicable in the countries where we operate and the principles behind those laws inform the application of this Code and relevant Centrus policies implementing this Code. For example, under the Centrus Energy Corp. Respectful Workplace Policy, Centrus requires its Employees to treat everyone with respect and dignity. Further, consistent with Section 6 of this Code ("Fair Employment Practices/Policy Against Harassment"), Centrus adheres to all employment and labor laws in the countries where we operate. Centrus' policy on these matters apply equally to our choice of business partners and contractors.

## **26. Media and Investor Relations**

Only the Corporate Communications department and its designee(s) are authorized to communicate with the media on behalf of Centrus. All media inquiries should be forwarded to the Corporate Communications department. From time to time, others may be authorized to communicate with the media on specific topics, working in coordination with the Corporate Communications department or its designee(s).

The Chief Executive Officer; the Chief Financial Officer; the Vice President, Corporate Communications; and their designees are authorized to communicate with investors, potential investors, financial analysts and advisors, rating agencies and financial institutions on behalf of Centrus. All inquiries from such persons or entities should be forwarded to the Vice President, Corporate Communications.

## **27. Approval and Review Process for Presentations, Reports, Articles, and Blogs**

Employees have to be sensitive to the fact that their statements may be attributed to Centrus by virtue of their position in the Company. If an Employee is invited to speak (e.g., to give a speech or to participate in a conference on a panel) or to write an article, blog, or other document, on a subject related to Centrus, its business or the nuclear fuel cycle, the Employee must – prior to



accepting the invitation – notify and obtain concurrence from his or her supervisor (Vice President or higher) along with the Vice President, Corporate Communications. For congressional, federal, state, or local government related events or output, the concurrence of the Vice President, Government Relations is also required.

Permission is required in all cases where the Employee is speaking on behalf of Centrus and/or will be identified as a Centrus Employee. However, even if the Employee is speaking in his or her own personal capacity and will not be identified as a Centrus Employee, permission is still required if the topic relates to Centrus or its business. The process and requirements are spelled out in greater detail in the Centrus Energy Corp. Policy Review and Approval Process for Presentations, Reports, Articles and Blogs (“Presentations Policy”).

Written presentation materials, articles, blogs, and other written material covered by this policy also require appropriate approvals. Approval requirements vary depending on the content and nature of the material; please see the Presentations Policy, which outlines the process and approval requirements.

Employees must consider whether their publicly expressed personal statements or opinions, be it on social media or otherwise, may be attributable to the Company. Centrus has no desire to interfere with Employees’ activities outside of work. However, where such activities disrupt the Centrus work environment or negatively impact Centrus’ reputation, Centrus reserves the right to take whatever action it deems appropriate to protect Centrus’ reputation and interests.

## **28. Political Contributions**

Generally, federal and state laws impose limits and other requirements on the contribution or provision of corporate funds and assets to any political party or to the campaign of any candidate. These laws are complex and subject to change, therefore no Centrus funds or assets, including the work time of any Employee, will be contributed, loaned or made available, directly or indirectly, to any political party or to the campaign of any candidate for a federal or state office without the prior approval of the Chief Compliance Officer. Employees may, however, spend work time supporting the Centrus Political Action Committee (“PAC”) as approved by their supervisors. Under no circumstances shall any Employee, other individual, or entity be compensated or reimbursed in any way for any political contributions made to federal or local candidates.

No funds or assets of Centrus may be used for, or contributed to, any foreign political party, candidate, or committee.

Centrus strongly encourages its Employees to become involved in civic affairs and to participate in political activities. Employees must recognize, however, that their involvement and participation must be on an individual basis, on their own time, and at their own expense. Further, when an Employee speaks on public issues, it must be made clear that comments or statements made are those of the individual and not the Company, unless such speaking is specifically approved as being on behalf of Centrus as part of his or her job. All media inquiries should be directed to the Corporate Communications department or its designees. See discussion in Section 26, “Media and Investor Relations.”

Employees are allowed, if they so choose, to contribute their personal money to the PAC sponsored by Centrus. However, Employees are under no obligation to contribute to the PAC.

## **29. Compliance and Discipline**

Failure to comply with laws, regulations, or the standards of conduct contained in this Code or any Centrus policies or procedures will result in disciplinary action that may include suspension, termination, referral for criminal prosecution, if appropriate, and reimbursement to Centrus for any losses or damages resulting from the violation. As with all matters involving investigations of violations and discipline, principles of fairness will be applied.

Disciplinary action will be taken against:

- (a) Any Employee who authorizes or participates directly in the violation;
- (b) Any Employee who deliberately fails to report a violation or deliberately withholds relevant and material information concerning a violation;
- (c) Any Employee who retaliates, directly or indirectly, (or encourages others to do so), against an Employee who reports a violation; or
- (d) The violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate supervision or a lack of diligence.

## To whom in the Company may I go if I have a concern?

### **Code Violations & Other Concerns**

Supervisor **or** Employee Concerns Manager **or** Director, Corporate Compliance  
**or** Chief Compliance Officer **or** Business Conduct Committee  
**or** any Company Officer or Board Director or Committee  
**or** Director, Corporate Security

See website or intranet for contact information or email [compliance@centrusenergy.com](mailto:compliance@centrusenergy.com)  
[or ITP@centrusenergy.com](mailto:ITP@centrusenergy.com) or Call Hotline: (800) 263-1632



Employee



### **Accounting & Auditing Concerns**

Write a Letter to: Centrus Energy Corp., Accounting & Auditing Concerns  
c/o Director, Internal Audit

6901 Rockledge Drive, Suite 800, Bethesda, MD 20817 **or**

Email: [accountingconcerns@centrusenergy.com](mailto:accountingconcerns@centrusenergy.com) **or**

Call Hotline: (800) 263-1632 **or**

Contact: Director, Internal Audit

## **Who do I go to if I have a Security Concern or concern relating to work on a DOE Contract?**

### **Inside the Company**

Jason Krumenacker

Phone: 865-241-7317 | Email: [Krumenackerjk@centrusenergy.com](mailto:Krumenackerjk@centrusenergy.com)

Relevant Site Facility Security Officer

At HQ the FSO is:

Mike Whitehurst

Phone: 301-564-3475 | Email: [WhitehurstM@centrusenergy.com](mailto:WhitehurstM@centrusenergy.com)

At Oak Ridge the FSO is:

Maurice (Mo) Parks

Phone: 865-241-7264 | Email: [ParksM@centrusenergy.com](mailto:ParksM@centrusenergy.com)

At Piketon the FSO is:

Angela Wright

Phone: 740-897-2749 | Email: [Wrightal@centrusenergy.com](mailto:Wrightal@centrusenergy.com)

Email: [accountingconcerns@centrusenergy.com](mailto:accountingconcerns@centrusenergy.com) or [ITP@centrusenergy.com](mailto:ITP@centrusenergy.com) or

Call: [Employee Concerns Hotline: \(800\) 263-1632](tel:(800)263-1632)

### **Directly to the U.S. Department of Energy**

#### **By Mail:**

U.S. Department of Energy

Office of Inspector General

ATTN: IG Hotline 1000

Independence Avenue, SW

Mail Stop 5D-031 Washington, DC 20585

#### **By Email**

Email: [ighotline@hq.doe.gov](mailto:ighotline@hq.doe.gov)

#### **By Phone:**

Hotline Telephone: (800) 541-1625

## **Contact Information**

### **Oak Ridge ECM**

Ayman Shourbaji  
(865) 241-7011  
[shourbajia@centrusenergy.com](mailto:shourbajia@centrusenergy.com)

### **Piketon/Paducah ECM**

Angela Litten  
(740) 897-2499  
[littenaf@centrusenergy.com](mailto:littenaf@centrusenergy.com)

### **Headquarters ECM**

Cia Martin  
(301) 564-3455  
[martinc@centrusenergy.com](mailto:martinc@centrusenergy.com)

### **Chief Compliance Officer**

6901 Rockledge Drive, Suite 800  
Bethesda, MD 20817  
(301) 564-3352  
[compliance@centrusenergy.com](mailto:compliance@centrusenergy.com)

### **Director, Corporate Compliance**

6901 Rockledge Drive, Suite 800  
Bethesda, MD 20817  
(301) 564-3338  
[compliance@centrusenergy.com](mailto:compliance@centrusenergy.com)

### **Accounting & Auditing Concerns**

c/o Director, Internal Audit  
6901 Rockledge Drive, Suite 800  
Bethesda, MD 20817  
(800) 263-1632  
[accountingconcerns@centrusenergy.com](mailto:accountingconcerns@centrusenergy.com)

## **Centrus Employee Concerns HOTLINE**

Employees can always submit concerns of all types  
anonymously by using the Employee Concerns  
HOTLINE:

**(800) 263-1632**