PRACTICAL GUIDE

# Ethics & Compliance

## How to act?

6

## FIGHTING QUALITY FRAUD, IRREGULARITIES, AND DOCUMENT FALSIFICATION

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orano
Giving nuclear energy its full value

# 6 FIGHTING QUALITY FRAUD, IRREGULARITIES, AND DOCUMENT FALSIFICATION

## Our rules


Quality-related fraud involves manipulating a situation to make out that a product or service complies with quality requirements when it actually does not.

Orano constantly endeavours to **deliver quality products and services**.

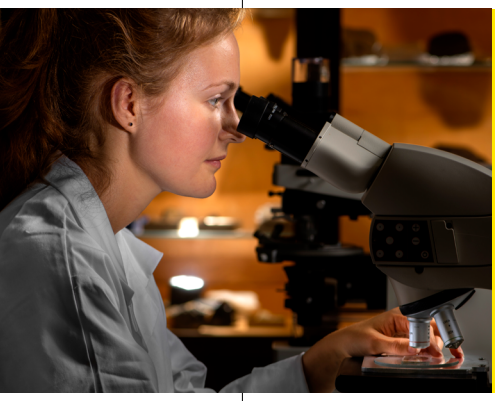
To this end, the Group ensures compliance with all current legal, regulatory and contractual requirements, as well as international best practices, and to meet its customer expectations regarding **the quality of its products and services**.

Furthermore, Orano requires that the behaviour of individuals, as well as activities carried out on its sites, are **compliant with the Group's rules of conduct and policies regarding quality. This vigilance applies to all levels of its production and supply chains**.

Compliance with these requirements is an essential criterion in the selection of our suppliers and partners.

As such, every person involved must **demonstrate vigilance and report** any misconduct, deviation, fraud or situation that is contrary to these requirements **to their manager**.

The alert must be raised at the first sign of any hint of fraud, defective products, actual or potential deviation to Group rules and policies, standards difficult to apply, or unattainable objectives, or objectives that may be reached to the detriment of quality.



### Key message

The quality of our products and services is a key success factor for the Group, which will not tolerate any compromise when it comes to quality.

The Group strongly fights irregularity and quality fraud, whether these are committed internally or by suppliers and subcontractors.

Failure to report an observed case of fraud equates to aiding and abetting!

# High-risk situations

There are several conditions that may motivate an individual or organisation to commit fraud.

Pressure is clearly identified as one condition that may cause an irregularity to occur (tight schedules, technical or industrial difficulties, financial constraints, etc.).

The second risk factor is the extent to which a given management system or organisation allows opportunities for irregularity (lack of controls, instructions that can be interpreted in various ways, etc.).

Below are some examples of situations that are conducive to irregularity, quality fraud or document falsification:

- **wanting to finish a task at any cost** despite an unrealistic deadline,
- **having technical difficulties** to obtain expected results,
- **thinking a simple conversation with an expert can validate a deviation from the rules,**
- **not being aware of the impact of one's activity** on nuclear safety and product quality,
- **not removing equipment that is non-calibrated or unsuitable for its intended use,**
- **carrying out a task without being sure of one's qualification** or authorisation to do so,
- **not planning for the absence of qualified and competent staff** in a particular position.

## Ask questions!

As part of your work or responsibilities, situations of irregularity, quality fraud or document falsification may appear. Do not hesitate to ask yourself a few simple questions:

**Do I have the skills and qualifications required to do this?**

**Do I have the means to complete my task (materials, instructions, time, tools, etc.)?**

**Am I aware of the impact of the quality of my work on nuclear safety and product quality?**

**Has the work or product been adequately verified in-house?**

For further training on preventing quality-related fraud: **quality-related fraud e-learning module** (Catalogue of Orano training modules).

# What to do if...

**The concrete examples provided below may help you to better identify high-risk situations and the right behaviour to adopt. However, as this list cannot cover every eventuality, situations involving irregularities, document falsification or quality-related fraud will need to be solved on a case-by-case basis.**

**Q:** What should I do if my superior insists that I do something I feel is not compliant with requirements?

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**A:** You must report it to your superior's manager or use one of the reporting channels available (quality network, Group Quality Department, Group whistleblowing platform).

**Q:** I am going to ask my on-site colleagues, who are carrying out the operation, to validate my inspection and sign the document. Is that acceptable?

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**A:** No. You must physically check the proper completion of an activity on-site before you can validate and sign my inspection. By signing this document, you are attesting to its content and becoming liable for it.

**Q:** Can someone sign off my name on a record if I did not carry out or witness the operation or verify its completion?

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**A:** No. This is not an option. Records must reflect operational reality and incur the liability of the persons mentioned.

**Q:** I need to make a "minor change" in a deliverable that has already been sent. Whom should I inform? Must I tell everyone?

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**A:** Yes. When they cannot be avoided, any corrections (even handwritten) must be legible and understandable; they must bear the date of the correction, the name of the author and their signature. All amendments must follow the same validation process as the original information. All users must be informed of all amendments.

**Q:** Can I round off measurements to remain within tolerance limits?

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**A:** No. This is not an option. Information that is written down must be representative of actual measurements. Accepting a value outside the tolerance range must be covered in a documented waiver.

**Q:** I would need to make compromises or skip steps in the process in order to meet deadlines. What should I do?

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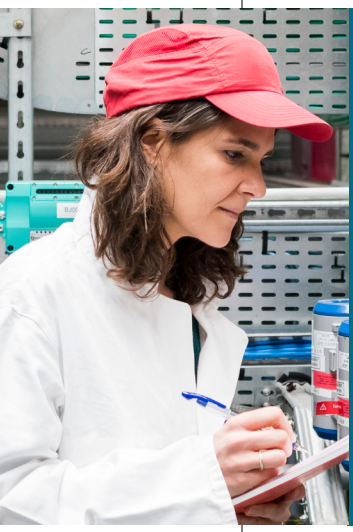
**A:** You must comply with requirements and carry out all steps of the process. Should you have a problem meeting planned or required deadlines, you must speak to your superior to warn them and to find appropriate solutions that comply with the Group's rules of conduct and applicable processes.



## Find out more

Timely reporting of any undesirable or suspect event may help prevent irreversible damage and consequences.

In the event of an irregularity, of fraud, or if you suspect quality-related fraud, you must immediately notify your line manager. If the situation requires you to report it to a neutral, independent third party, please notify your organisation's Quality representative or the Group Quality Department.