SUPPLIER MANAGEMENT SYSTEM SPECIFICATION

By way of supplement to ISO 19443: 2018

Supplier edition of January 2024

orano

1. PURPOSE OF THE DOCUMENT

This specification formalizes the requirements specific to nuclear activities conducted by Orano suppliers and subcontractors. It supplements standard ISO 19443: 2018 [10.], to take into account French regulations on INBs and requests from the French Nuclear Safety Authority (Autorité de Sûreté Nucléaire). et les demandes de l'Autorité de Sûreté Nucléaire.

The supplier or service provider must comply with these requirements when executing a contract awarded by an Orano entity operating a nuclear facility or otherwise involved in nuclear activities.

They also apply to suppliers carrying out radioactive cleanup and dismantling services under Orano CAEAR acceptance. Appendix 2 details the requirements for this type of service, in addition to those in this specification.

In practice, the generic requirements of this specification are supplemented by specific requirements noted in the expression of needs and/or in the contract.

2. DEFINITIONS AND ABBREVIATIONS

2.1 ABBREVIATIONS

ACQ	Activity Concerned by Quality
AP / AE	Authorization to Practice / Autorisation d'Exercer
AIP	Activity Important for Protection
RFQ	Request For Quotation
ASN	Autorité de Sûreté Nucléaire [French Nuclear Safety Authority]
CAEAR	Commission d'Acceptation des Entreprises d'Assainissement Radioactif [commission on acceptance of radioactive cleanup companies]
CEP	Periodic inspections and tests [Contrôles et Essais Périodiques]
CFS	Counterfeit, Fraudulent, Suspect
CSFN	Comité Stratégique de la Filière Nucléaire [strategic committee for the French nuclear sector]
CT	Technical Inspection [Contrôle Technique]
DR	Defined Requirement
EIP	Element Important for Protection
EIS	Element Important for Safety
GE	grouping of companies / consortium [Groupement d'Entreprises]
HSE	Health, safety and environment
ICPE	Installation Classée pour la Protection de l'Environnement (environmentally regulated facility)
DI	Documented Information
INB / BNI	Installation Nucléaire de Base [regulated nuclear facility / Basic Nuclear Installation - BNI per ASN]
INBS / SBNI	Installation Nucléaire de Base Secrète [defense nuclear facility - SBNI per ASN]
IP	Important for Protection (of protected interests)
ITNS	Important To Nuclear Safety
ISO	International Organization for Standardization
SP	Safety Parameter
OEF/REX	Operating Experience Feedback [equivalent to REX: Retour d'EXpérience]
QMS	Quality Management System

2.2 REMINDER OF DEFINITIONS PER BNI ORDER[1.]

Activity Important for Protection: activity that contributes to the technical or organizational measures to prevent or sufficiently limit the risks and drawbacks presented by the facility in terms of protected interests.
The AIPs detailed in the internal reference systems of the operational entities concern the following areas:

- Studies and changes;
- Works and changes;
- Scheduled maintenance, periodic inspections and tests (CEP), conformity assessments;
- Facility operation, management and monitoring;
- Purchasing;
- Training;
- Handling of deviations.

Element important for protection (EIP): a structure, equipment, system, component and/or software present in the facility or falling under the operator's responsibility that performs a function necessary to the demonstration of the protection of interests or that verifies that that function is ensured.

Defined requirement (DR): Requirement assigned to an element important for protection, so that it fulfills with the expected characteristics of the function provided for in the demonstration mentioned in the second paragraph of article L. 593-7 of the French environmental Code, or to an activity important for protection so that it meets its objectives with respect to this demonstration (as per BNI order).

Operator: natural or legal person operating a basic nuclear installation (INB/BNI), whether its situation is in order or not, or having made a creation authorization application provided for by article L. 593-7 of the environment code with a view to operating such an installation.

Subcontractor: natural or legal person other than the operator, performing operations or supplying goods or services which participate in an AIP or relate to an EIP.

2.3 DEFINITIONS INTRODUCED BY ISO 19443: 2018

Important To Nuclear Safety (ITNS): characteristic of a product, service, item or activity, whose failure could result in undue radiation exposure of people or the environment.

The notion of ITNS addresses only part of the protected interests, as specified in § 2.4 and Appendix 3. In order to guarantee the same level of requirements for nuclear safety or protected interests, Orano asks its suppliers to consider all the EIPs and AIPs it has identified, as ITNS to be handled in accordance with the requirements of ISO 19443 and the additions introduced by this specification.
In other words, the provisions implemented for the supply of ITNS products or services shall also be applied to the EIPs and AIPs defined.

Commercial grade item or activity: item or activity which has an impact on nuclear safety and which has not been designed, manufactured or produced in accordance with specific nuclear requirements.

2.4 OTHER DEFINITIONS RELATED TO THE SPECIFICATION

Activity concerned by quality (ACQ): an activity whose failure may impact the quality of Elements Important for Safety (EIS).

Defined requirements (for each ACQ): requirements necessary to obtain and maintain the quality of structures, equipment and materials, the assemblies associating them and the operating conditions of the installation (EIS).
They must be defined for each activity concerned by quality, taking into account its importance for safety.

CAEAR: Commission Orano d'Acceptation des Entreprises d'Assainissement Radioactif [Orano commission on acceptance of radioactive cleanup companies]

CFS item (or CFSI): counterfeit, fraudulent or suspect item [per IAEA NP-T-3.21]

- **Counterfeit**: item intentionally manufactured, reconditioned or modified in such away as to imitate the original product without authorization in order to be passed off as genuine;
- **Fraudulent**: item intentionally tampered with with intent to deceive (including an item supplied with incorrect identification, falsified or inaccurate certification. This also includes an item sold by an entity that has acquired the legal right to manufacture a specified quantity of an item, but produces a larger quantity than authorized and sells the excess as legitimate stock);
- **Suspect**: item for which there is an indication or suspicion that it may not be genuine, because it may be fraudulent, counterfeit or non-compliant.

Customer: an Orano entity responsible for the construction or operation of a nuclear facility (classified as a INB / BNI, INBS / SBNI, or an ICPE with radioactive substances), which receives a product or a service based on a formalized expression of requirements and on a contract.

Technical Inspection: is a means of ensuring that products and services are compliant. See §7.5.1.

Supplier: internal or external to Orano, it signs a contract with an Orano entity (the customer) and provides the product or service requested. Depending on the contract, it may intervene on an Orano site or carry out its activities on premises of its choosing.
In this document, the term "supplier" includes service providers.
The "supplier" may be an "outside contractor" in the sense of the BNI Order.

Grouping of companies / consortium [GE - Groupement d'Entreprises]: a number of suppliers working together in association on a temporary footing to carry out a contract order. A joint venture (JV) agreement is then drawn up and a legal representative is appointed for the grouping.

Protected interests:

- For INB/BNIs, the interests protected by law are listed in Article L593-1 of the French Environmental Code. It concerns public safety, nuclear safety, public health, public hygiene, and the protection of nature and the environment.
- For INBS/SBNI, interests are defined in the Order of February 15, 2022. It concerns nuclear safety and radiation protection, public health and, the protection of nature.

Hold point: point beyond which the design, development, production and preparation of the product should not continue without the customer's approval.

Witness point: point at which the customer decides whether or not to witness the operation or its inspection. This notice does not stop continuation of the operations.

Product, Service: as defined in ISO 9001:2015 [9.]

Nuclear safety: all technical and organizational measures relating to the design, construction, operation, shutdown and decommissioning of basic nuclear installations and the transport of radioactive substances, taken with a view to preventing accidents or limiting their consequences [Article L-591-1 of the French Environment Code].

Subcontractor: organization which signs a contract for supplies or services with a supplier. There is no direct contractual link with the customer.

Monitoring: the end goal of monitoring is to provide the Operator with the assurance that external contractors are applying the policies communicated for the protection of interests, that the requirements defined in this specification are being met, and that the requirements notified in the order documents are being complied with.

Management system as defined in ISO 9000: 2015 [9.]. It notably takes account of nuclear safety-related challenges.

3. OVERVIEW OF GAPS BETWEEN ISO 19443:2018 AND THIS SPECIFICATION

This section provides an overview of the actions to be taken by suppliers, in sofar as their system complies with standard ISO 19443: 2018 to ensure compliance with this specification.
Sections §4 to §8 supplement this information with further details.

orano

Differences between ISO 19443: 2018 and this Orano specification

Ch. & requirements	Level of requirements in ISO 19443 compared to PO ORN QP MS 51	Actions to be taken to meet Orano specification PO ORN QP MS 51 requirements	§ of PO ORN QP MS 51 to refer to
§1 : Scope	**LESS SPECIFYING** The standard covers ITNSs: it focuses on nuclear safety and not on protection of protected interests.	The supplier must extend the scope of the documented information describing the provisions implemented under ISO 19443 to include ACQs, AIPs and EIPs.	§4 – Context of the organization
§3 : Terms & definitions	**MORE SPECIFYING** The standard defines the control of trade items: determination of critical characteristics, means of verification and acceptance for the intended nuclear safety functions.	Nothing to do	
	EQUIVALENT LEVEL OF REQUIREMENT The graduated approach to importance of risks and stakes in relation to nuclear safety is similar to the proportionate approach to stakes in relation to protection of protected interests in the INB/BNI regulations.	Nothing to do	
	LESS SPECIFYING The standard defines only ITNS items or equipment and not EIP/AIP/ACQs.	The system must define the EIP/AIP and ACQs in their system. The provisions relating to ITNS items/services must be extended to items and services of importance to Protected Interests.	§2 – Definitions and abbreviations §4 – Context of the organization
	LESS SPECIFYING The standard gives a smaller number of definitions of terms and concepts, and in particular does not define the concepts of AIP/EIP/DR, the different players in a contractual or subcontracting relationship (principal, operator, supplier, service provider, subcontractor, outside contractor, etc.), control and monitoring actions (technical control, hold point, etc.).	The supplier must appropriate, mention and use in their system the additional definitions contained in the Orano specification.	§2 – Definitions and abbreviations

Ch. & requirements	Level of requirements in ISO 19443 compared to PO ORN QP MS 51	Actions to be taken to meet Orano specification PO ORN QP MS 51 requirements	§ of PO ORN QP MS 51 to refer to
§4 : Context of the organization §4.4: QMS and its processes	**LESS SPECIFYING** The standard formulates the obligation to provide documented information including a description of how requirements are taken into account. It does not list or detail the specific cases or practices concerned.	In addition, the supplier must specify specific cases where documented information is mandatory (identification of AIP/EIP/DR, compliance with defined requirements, identification and handling of deviations and significant events, OEF/REX, etc.).	§4 – Context of the organization
	LESS SPECIFYING The context for establishing the QMS focuses on nuclear safety and not on the protection of protected interests.	The supplier must extend the context to be taken into account beyond nuclear safety. It must take into account the full spectrum of protected interests.	§4 – Context of the organization
	LESS SPECIFYING The standard does not specify that documented information related to the QMS must be submitted to the customer for acceptance.	The obligation to submit to Orano documented information presenting the system implemented must be taken on by the supplier. This applies notably to the quality document mentioned in §3.	§4 – Context of the organization
	LESS SPECIFYING The standard does not explicitly specify the obligation of documented information for a consortium (GE).	Given the organizational risks likely to be introduced into IP activities or elements by a consortium-type organization, a quality document must be drawn up by the supplier and validated by the operator.	§4 – Context of the organization
	LESS SPECIFYING The standard does not explicitly specify the obligation to keep contract-related certificates/accreditations up to date.	The supplier undertakes to maintain the certificates/accreditations necessary for execution of the contract throughout the contract period.	§4 – Context of the organization
§5 : Leadership	**LESS SPECIFYING** The standard does not specify a commitment to observe the customer's codes/charters/policies.	The supplier's management formally undertakes, in the DI implemented to meet PO ORN QP MS 51, to take cognizance of, appropriate, observe and pass on within its own organization Orano's codes/charters/policies, in particular those listed in the specification.	§5 – Leadership
	LESS SPECIFYING The standard deals solely with nuclear safety and quality aspects (including product quality). It does not take into account other aspects of protection of interests: public health and safety, protection of nature and the environment, collective radiation protection.	The supplier's management commits itself to the protected interests aspects in addition to nuclear safety and quality, and must be a driving force in disseminating and ensuring the appropriation of Orano's HSE baseline by its employees.	§5 – Leadership

Ch. & requirements	Level of requirements in ISO 19443 compared to PO ORN QP MS 51	Actions to be taken to meet Orano specification PO ORN QP MS 51 requirements	§ of PO ORN QP MS 51 to refer to
§5.1.3 : Safety culture	**EQUIVALENT LEVEL OF REQUIREMENTS** Identical overall, even if some items are more detailed in the standard (alert system, questioning attitude, challenging of at-risk acts, behaviors and conditions). The specification, in particular in Appendix 1, provides details on nuclear safety awareness, focusing in particular on personal commitment and the reporting of weak signals.	Nothing to do	§5 – Leadership §6.1 – Competence and awareness Appendix 1
§5.2 : Policy	**EQUIVALENT LEVEL OF REQUIREMENT** Commitment not to compromise nuclear safety through other priorities required also in the specification.	Nothing to do	§5 – Leadership
§6.1.3 : Identification of ITNS items and activities **§6.1.4 : Graduated approach**	**MORE SPECIFYING** The supplier must translate the customer's ITNSs into their own ITNSs (define their ITNSs), which enables the supplier to take ownership of the issues at stake, even if they are limited to nuclear safety and quality.	Nothing to do	-
	EQUIVALENT LEVEL OF REQUIREMENT Application of graduated approach versus proportionate approach in relation to risks and stakes (comparable approaches).	Nothing to do	§7 – Operational activities, notably §7.1 and §7.4
§7 : Support **7.1.5: Resources for monitoring**	**MORE SPECIFYING** Missing in the Orano specification: adequacy of monitoring and measurement resources in relation to specified tolerances (range and accuracy).	Nothing to do	-

Ch. & requirements	Level of requirements in ISO 19443 compared to PO ORN QP MS 51	Actions to be taken to meet Orano specification PO ORN QP MS 51 requirements	§ of PO ORN QP MS 51 to refer to
§7 : Support **§7.2 : Competence / Skills**	**LESS SPECIFYING** The Oranospecification extends to the competence of persons performing AIPs.	The supplier must apply the provisions set out for competence management to the skills of people carrying out AIP, ACQ or working on EIPs.	§6.1 – Competence and awareness
	LESS SPECIFYING This includes management of authorizations, in particular special authorizations to practice (AP/AE), and of the skills of people assigned to carry out technical inspections, monitoring or checking actions and AIP/ACQ activities.	The supplier must extend the competence management process to include: - authorizations, - the skills of people assigned to carry out technical inspection, monitoring or checking activities, - the skills of people assigned to carry out AIP/ACQ activities.	§6.1 – Competence and awareness
	LESS SPECIFYING Competence of the persons carrying out the technical inspections, monitoring or verification at least identical to that of the persons who carried out the activities	The supplier must ensure that this obligation is integrated into the competence management provisions.	§6.1 – Competence and awareness
	EQUIVALENT LEVEL OF REQUIREMENT Persons shall be assigned by comparing skills required with skills acquired.	Nothing to do	§6.1 – Competence and awareness
§7 : Support **§7.5: documented information**	**EQUIVALENT LEVEL OF REQUIREMENT** Although the specification provides more details on how to control translation.	DI control procedures must take into account the requirements specified for document signature procedures.	§6.2 – Documented information
§ 7.5.3 : Control of documented information	**EQUIVALENT LEVEL OF REQUIREMENT** Although the specification defines more precisely the documented information to be controlled.	Nothing to do	§6.2 – Documented information
§8 : Operational activities		Nothing to do The specification re-specifies scope.	§7 – Operational activities
§8.1 : Operational planning & control	**EQUIVALENT LEVEL OF REQUIREMENT** Although the specification introduces the management of project risks related to compliance with notified requirements.	The supplier specifies that operational control of projects/contracts/orders requires risk management for the project/contract/order in question.	§7.1 - Operational planning & control

Ch. & requirements	Level of requirements in ISO 19443 compared to PO ORN QP MS 51	Actions to be taken to meet Orano specification PO ORN QP MS 51 requirements	§ of PO ORN QP MS 51 to refer to
§8.2 : Product-related requirements **§8.2.3: Review of product-related requirements**	**MORE SPECIFYING**	Nothing to do	-
§8.3.2 : Planning of design and development of products and services	**MORE SPECIFYING**	Nothing to do	-
§8.3.4 : Managing design and development	**MORE SPECIFYING**	Nothing to do	-
§8.3.6 : Design and development changes	**MORE SPECIFYING**	Nothing to do	-
§8.4 : Control of externally provided processes, products and services **§ 8.4.1 : General**	**EQUIVALENT LEVEL OF REQUIREMENT** Even if the qualification framework is different, and if details are provided on the qualification criteria for an external service provider (safety at work, security, technical aptitude, ability to perform, etc.).	When passing on requirements to its subcontractor, the supplier must make it clear that it is obliged to "flag" an order for the nuclear industry, in a way that is unequivocal for its subcontractor.	§7.4.1 – General §7.4.3 – Information for external providers
§ 8.4.2 : Type and extent of control	**MORE SPECIFYING**	Nothing to do	-
§ 8.4.2 Type and extent of control	**LESS SPECIFYING**	The supplier must specify and explain in its system the control procedures it is likely to implement for its own subcontractor. The various means used are auditing, monitoring and associated monitoring notifications (PA, PC, etc.).	§7.4.2 – Type and extent of control

Ch. & requirements	Level of requirements in ISO 19443 compared to PO ORN QP MS 51	Actions to be taken to meet Orano specification PO ORN QP MS 51 requirements	§ of PO ORN QP MS 51 to refer to
§ 8.4.2 Type and extent of control	**LESS SPECIFYING**	In addition to technical controls and monitoring actions, the supplier must define in its system the concept of verification; it must also pass on the obligation to verify to its subcontractors, as well as the methods of implementation.	§7.4.2 – Type and extent of control
	LESS SPECIFYING	To be specified for checks and monitoring actions.	§7.4.2 – Type and extent of control
	EQUIVALENT LEVEL OF REQUIREMENT	Nothing to do	
	LESS SPECIFYING	The supplier's system must include arrangements for transmitting data to the customer.	§7.4.3 – Information for external providers
§8.5.1 : Control of production and service provision	**LESS SPECIFYING**	The supplier must arrange for a technical inspection to be carried out whenever a product manufacturing activity is identified as an AIP/ACQ or as work on an EIP/EIS-type element.	§7.5.1 – Control of production and service provision
§8.5.2 : Identification and traceability	**MORE SPECIFYING**	Nothing to do	-
	EQUIVALENT LEVEL OF REQUIREMENT	The supplier must consider traceability to be a requirement insofar as for an AIP or EIP it is an element attesting to its conformity and to the competence of personnel, and that specific provisions may exist under the contract.	§6.2 – Documented information §7.5.2 – Identification and traceability
	LESS SPECIFYING	The supplier must define the procedures for keeping, filing and archiving intermediate documented information attesting to compliance, the competence of personnel and that specific provisions may exist under the contract.	§6.2 – Documented information
§8.5.4 : Preserving	**MORE SPECIFYING**	Nothing to do	-

Ch. & requirements	Level of requirements in ISO 19443 compared to PO ORN QP MS 51	Actions to be taken to meet Orano specification PO ORN QP MS 51 requirements	§ of PO ORN QP MS 51 to refer to
§8.5.5 : Post-delivery activities	**MORE SPECIFYING**	Nothing to do	-
§8.6 : Release of products and services	**EQUIVALENT LEVEL OF REQUIREMENT**	Nothing to do	-
§8.7 : Control of nonconforming outputs	**LESS SPECIFYING**	Point to address in communication with the customer. The supplier is obliged to inform Orano in the event of fraud or inappropriate behaviour.	§7.7 – Duty to alert in the event of fraud or inappropriate behavior
§8.7.1 : (without title)	**EQUIVALENT LEVEL OF REQUIREMENT**	Clarification of the criteria requiring exchange with the customer (the specification specifies that customers and suppliers exchange information on analysis and processing; it is explicit on the criteria for customer information (impairment of protected interests, anomaly/change calling into question product qualification, etc.)). The supplier must specify in the provisions for handling non-conforming outputs the precise cases of communication with the customer.	
	MORE SPECIFYING Scrapping is an alternative.	Nothing to do	-
	MORE SPECIFYING Deferred processing of an item is provided for (pending root cause analysis results).	Nothing to do	-
§8.7.2 : Documented information	**EQUIVALENT LEVEL OF REQUIREMENT** Even if the specification is not as precise as regards the retention of justification for actions taken and concessions obtained.	Nothing to do	-

Ch. & requirements	Level of requirements in ISO 19443 compared to PO ORN QP MS 51	Actions to be taken to meet Orano specification PO ORN QP MS 51 requirements	§ of PO ORN QP MS 51 to refer to
§9 : Performance evaluation **§ 9.1: Monitoring, measurement, analysis and evaluation**	**MORE SPECIFYING** The assessment of QMS performance and effectiveness must take into account the demonstration of conformity to requirements applicable to products and/or services, and the ability of processes to achieve the expected results. In addition, the standard focuses on the evaluation of the performance and effectiveness of the QMS, corrective actions, external service providers and actions to improve safety culture, including, where appropriate, statistical techniques.	Nothing to do	-
§9.2 : Internal audit	**MORE SPECIFYING** Internal auditing must also cover contract audits.	Nothing to do	-
§9.3 : Management review	**MORE SPECIFYING**	Nothing to do	-
§10 : Improvement **§10.1 : General**	**EQUIVALENT LEVEL OF REQUIREMENT**	The supplier must specify that the sources of improvement may also stem from taking into account operating experience feedback (OEF/REX).	-
	EQUIVALENT LEVEL OF REQUIREMENT	The supplier must take into account and specify in its provisions that the improvement must also cover fraud risk prevention.	-
§10.2 : Nonconformity and corrective action	**MORE SPECIFYING** The specification does not specify that non-conformances and corrective actions shall be managed and reported without undue delay to the relevant management level, that the analysis shall include assessment of the impact of the non-conformance, that root cause analysis should be carried out, where applicable.	Nothing to do	-
	LESS SPECIFYING	The supplier's provisions for dealing with non-conformities must specify how an event likely to be declared as significant (significant event - SE) is to be handled.	§7.6 – Control of nonconforming outputs
§10.3 : Continuous improvement	**EQUIVALENT LEVEL OF REQUIREMENT** Even if the specification refers to protected interests.	Make sure to go beyond safety culture itself, and cover the protection of protected interests as well as the culture of interest protection.	§8 – Continuous Improvement

4. CONTEXT OF THE ORGANIZATION (§4 OF ISO 19443: 2018)

The supplier must take into account and extend to the protection of interests its management system (in the "quality document" mentioned below for instance), and the associated objectives are to be passed onto the right level of the organization and its processes. It shall take into account the interested parties relevant to its activity.

The supplier sets out in a "**quality document**" what it commits to doing to comply with this specification. This documented information is submitted to the customer for review and approval.

This documented information is mandatory in the four specific cases below:

- When the contract includes an ISO 19443 certification requirement and the supplier:
  - is either not ISO 19443 certified,
  - or is ISO 19443 certified but not for the scope concerned by the contract order;
- If the supplier's management system does not meet the requirements of this specification;
- When the contract order requires a specific organization for a given period of time;
- in the case of a grouping of companies, even if each of the companies is ISO 19443 certified and meets this specification.

Any grouping of companies thus gives rise to:

- A **joint venture (JV) agreement**,
- a "**quality document**" based on the grouping's architecture which describes the organization implemented, the responsibilities, interfaces and control and monitoring requirements of the other members of the grouping by the legal representative.

  The document defines the procedures established by the grouping as concerns project follow-up (including contract/order review), compliance with specified requirements, risk analysis, identification and handling of deviations, and internal audits.

  The legal representative coordinates and validates this document.

The supplier notifies the customer without delay of any change in its management system or its organization.

For contract orders requiring approvals, certifications or accreditations, the supplier commits to sending to the customer evidence that they are maintained over time throughout the contract order period.

5. LEADERSHIP (§5 OF ISO 19443: 2018))

In carrying out Orano projects, the supplier's Management undertakes in particular to ensure that the following documents are adopted and implemented by its employees:

- The Code of Ethics [5.];
- The Nuclear Safety Charter [6.];
- The Safety-Environment Policy [7.] [8.];
- The specific HSE Charter or Policy in the case of jobsites;
- The Social Specification, within the limit of its field of application [2.]
- Any "local" policies.

The supplier's Management is responsible for:

- The exactness of the data transmitted for its listing and responses to calls for bids (RFQs);
- Countering reprehensible or risky acts, behaviours and situations;
- The level of nuclear safety, occupational safety and quality culture of its employees, teams and organization, including of its subcontractors;
- The technical skills of its employees and their knowledge of what is at stake in their activity in terms of protected interests and the risks of the nuclear installation or of the site;
- Paying the necessary attention to ensure that neither nuclear safety nor environmental protection are compromised by decisions taken;
- Its contribution to providing feedback on operating experience for events concerning it, followed if necessary by the definition and deployment of improvement actions.

The supplier's Management promotes and supports a culture of quality, nuclear safety, conventional safety, environmental and radiation protection:

- By fostering a shared understanding of the fundamental aspects of quality, safety, security, environmental protection and radiation protection within the organization;
- By strengthening a learning and questioning approach at each level of the organization to contribute to tangible continual improvement in the protection of interests;
- By instilling a policy of responsibility, transparency and constant employee commitment to meeting customer requirements and striving for customer satisfaction.

In that sense, the supplier develops management practices and a working environment that promote on a long-term basis the appropriate attitudes, behaviors and actions.

Components of awareness are given in Appendix 1 of this specification.

6. SUPPORT (§7 OF ISO 19443: 2018)

6.1 COMPETENCE AND AWARENESS (§7.2 AND §7.3 OF ISO 19443: 2018)

Awareness

People assigned to an AIP/ACQ or working on an important EIP/EIS-type element must also be aware of how to identify CFS items and falsified documents.

Points to raise awareness are provided in appendix 4, in the Orano flyer "Ethics & Compliance - Combating quality fraud, irregularities and document falsification".

Competence / Skills

The skills of the persons assigned to perform, or to carry out the technical inspection, verification and, where necessary, monitoring of an AIP/ACQ or persons working on an important EIP/EIS-type element must be defined.

The supplier puts processes in place to confirm that the persons it assigns to AIPs/ACQs, or working on an EIP/EIS-type important element, to modifications to design and development, to technical inspections, verification activities or assessment of those activities, possess the necessary mandatory qualifications and skills.

The skills of the persons assigned to carry out technical inspection, verification and, where necessary, monitoring activities must be at least identical to those of the person performing the intervention.

The supplier takes appropriate measures in terms of regulatory training to ensure that the persons assigned to an AIP/ACQ and working on an EIP/EIS-type important element have the necessary skills and that their skills are maintained over time.

Qualifications/authorizations/permits

The supplier takes appropriate measures in terms of training or special authorization to practice (AP/AE) to ensure that persons assigned to activities for which the challenges in terms of the protection of interests requires individual authorization by the customer meet the required conditions for authorization.

The supplier takes the appropriate training measures to be able to issue and maintain the regulatory qualifications or certifications, as well as the authorizations or permits of the persons assigned to an AIP/ACQ and working on an EIP/EIS-type important element.

6.2 DOCUMENTED INFORMATION (§7.5 IN ISO19443:2018)

Documented information related to the contract:

- Is verified. The verification is done by persons other than those who collected the data and drew up the documented information.
- The verification/validation procedures implemented must enable formal, unambiguous identification of the person who carried out the task. For example, the use of images for signatures is prohibited; electronic signatures or manual signatures with specimen presented in the "quality document" mentioned in §4 are authorized
- If "intermediate" documented information is produced, it is kept, filed, archived and made available to the customer. Any information copied into an information system must be verified by a person other than the person who made the copy.

Reports, meeting reports and other documented information to be drawn up for purposes of the contract, along with their methods of validation, keeping and filing, are described in the "quality document" mentioned in §4.

The supplier sends the documented information specified under the terms of or in the contract to the customer.

In particular, technical inspections (§7.5.1) and verification and assessment activities (§7.4.2), as well as monitoring activities where applicable (§7.4.2), carried out for an AIP/ACQ or for work on a EIP/EIS-type important element are subject to documented information and traceability requirements for purposes of before-the-fact and after-the-fact verification of compliance with defined requirements (DR).

7. OPERATIONAL ACTIVITIES (§8 IN ISO 19443: 2018)

7.1 OPERATIONAL PLANNING AND CONTROL (§8.1 IN ISO9001:2015)

The measures taken in terms of operational planning and control must be proportionate to the stakes involved in the project, while respecting customer requirements, resource constraints, deadlines and product quality.

The supplier implements a project risk management initiative as necessary in connection with compliance with listed requirements.

7.2 REQUIREMENTS RELATED TO PRODUCTS AND SERVICES (§8.2 IN ISO 19443: 2018)

7.2.1 Review of the requirements for products and services (§8.2.3 in ISO19443:2018)

The risks associated with CFS items or services are taken into account in the review.

A risk analysis is done for purposes of the contract review. The conclusions of the risk analysis are documented. They are integrated into the “quality document" cited in §3 for the cases concerned.

7.3 DESIGN AND DEVELOPMENT OF PRODUCTS AND SERVICES (§8.3 IN ISO19443:2018)

The supplier defines its organization, the associated processes and has these validated by the customer where stipulated by the contract.

In the case of design, the review, verification and validation activities can be performed by technical inspection (§7.5.1) and verification (§7.4.2),

7.4 CONTROL OF EXTERNALLY PROVIDED PROCESSES, PRODUCTS AND SERVICES (§8.4 IN ISO 19443: 2018)

7.4.1 General (§8.4.1 in ISO 19443: 2018)

The requirements of this specification must be taken into account in the methods of assessment and selection of subcontractors.

7.4.2 Type and extent of control (§8.4.2 in ISO 19443: 2018)

Verification:

The supplier performs verifications, regularly and in a way that is proportionate to the challenges, based on spot checks on the performance of operations and/or inspections concerning product realization.

These verifications are performed by persons different to those who carried out the AIP/ACQ or who worked on an EIP/EIS-type important element–and must have the appropriate skills and qualifications.

Monitoring:

The objective of the supplier’s monitoring of subcontractors is set out in §2.3.

The supplier monitors its subcontractors in a way which is proportionate to the importance of the challenges involved in the contracts entrusted to it by the customer.

For operations entrusted to subcontractors, the supplier performs independent assessments, regularly and in a way that is proportionate to the challenges, relying as necessary on:

- Scheduled (and possibly unannounced) monitoring of the performance of operations and/or technical inspections carried out by trained personnel;

- An overall analysis of the performance of a given subcontractor, based on data including a summary of monitoring actions;

The documented information relating to the results of monitoring and carried out by the supplier are transmitted to the designated Orano contacts.

It should be noted that the customer monitors its suppliers in a way which is proportionate to the importance of the challenges involved in the contracts it has entrusted to them.

Hold points and witness points are indicated in the documented information sent by the customer or, in their absence, in the supplier's own documents and validated by the customer.

7.4.3 Information for external providers (§8.4.3 in ISO 19443: 2018)

The external service provider must be clearly informed that the services and/or products delivered are destined for the nuclear industry.

Whenever an AIP/ACQ or the supply of / work on an EIP/EIS-type element is subcontracted, the applicable requirements are passed onto the supplier's subcontractors concerned by the contract, regardless of their tier.

The order must unambiguously specify the AIP/ACQ nature of its service or intervention on / supply of an EIP/EIS-type element.

The supplier facilitates any monitoring or verification action by the customer, whether planned or unannounced, to assess the ability of subcontractors to apply its Policies on protection of interests, occupational safety and quality, to accomplish all or part of an AIP/ACQ-type activity or to provide an EIP/EIS-type element, or to contribute to the improvement of the protection of interests.

Information by the customer on events liable to impact them also includes those liable to impact the protection of interests or the qualification of the product.

7.5 PRODUCTION AND SERVICE PROVISION (§8.5 IN ISO 19443: 2018)

7.5.1 Control of production and service provision (§8.5.1 in ISO 19443: 2018)

Whenever an activity involved in product realization is identified as an AIP/ACQ, or as work on an EIP/EIS-type element, it must be subject to a systematic technical inspection. The people in charge of technical inspection tasks are present during the key phases of the activity's execution.

An organization is defined by the supplier and approved by the customer for the conduct of technical inspections on AIPs/ACQs or work on an EIP/EIS-type elements.

Technical inspections are recorded by the supplier or its subcontractors and transmitted to the customer in the tools specified by the customer or, in their absence, in the supplier's own recording materials, but in this case they must have been validated by the customer.

7.5.2 Identification and traceability (§8.5.2 in ISO 19443: 2018)

Traceability: When a supplier executes all or part of an AIP/ACQ or works on an EIP/EIS-type important element, traceability is required whenever it is a matter of elements demonstrating:

- Compliance of the product with the defined requirements,
- The competence of the personnel assigned to perform the related tasks.

Specific measures may be required under the terms of the contract.

The persons who carried out the activities and, more generally, the resources used in their performance, are identified.

7.6 CONTROL OF NONCONFORMING OUTPUTS (§8.7 IN ISO 19443: 2018)

In the specific case of deviations from defined requirements or events liable to be declared as significant events, the supplier and customer take the necessary steps to exchange the information required for analysis and processing, in accordance with ASN guide no. 21 [11.]).

7.7 DUTY TO ALERT IN THE EVENT OF FRAUD OR INAPPROPRIATE BEHAVIOR

If an Orano supplier or subcontractor detects a case of quality fraud or inappropriate behavior in relation to quality, it must immediately inform its Orano customer (see § 7.6).

8. CONTINUOUS IMPROVEMENT (§10.3 IN ISO9001: 2015)

The supplier extends its continuous improvement approach to the protection of interests.

9. CHARACTERISTICS OF THE DOCUMENT

9.1 REFERENCE DOCUMENTED INFORMATION

[1.] French Order of February 7, 2012, setting the general rules concerning basic nuclear installations

[2.] French Order of February 15, 2022 setting the general rules concerning defense-related nuclear facilities and activities

Order of August 10, 1984 relating to the quality of the design, construction and operation of basic nuclear installations, repealed on July 1, 2013 by the BNI Order of February 7, 2012 for INB/BNIs, on February 15, 2022 by the SBNI Order of February 15, 2022 for INBS/SBNIs.

[3.] The French Order of May 26, 2014 relating to the prevention of major accidents in classified facilities mentioned in Section 9, Chapter V, Title I of Book V of the French Environmental Code

[4.] CSFN – Social specification applicable to services or construction/repairs carried out on a basic nuclear installation – July 2012

[5.] The Code of Ethics and Business Conduct" ["Code d'éthique et de conduite des affaires"] - Reference Orano CM ORN DIR CPL 1

[6.] The Nuclear Safety Charter - Reference Orano CM ORN HSE SUR 1

[7.] The Safety-Environment Policy - Reference Orano CM ORN HSE SUR 2

[8.] The Health - Safety - Radiation Protection policy - Reference Orano CM ORN HSE SAN 1

9.2 ASSOCIATED DOCUMENTED INFORMATION

[9.] ISO 9000: 2015 - Quality management systems – Essential principles and vocabulary

[10.] ISO 19443: 2018 - Quality management systems - Specific requirements for the application of ISO 9001: 2015 by organizations in the supply chain of the nuclear energy sector supplying products and services important to nuclear safety (ITNS)

[11.] ASN Guide No. 21: Processing conformity deviations with respect to a defined requirement for an element important for protection (EIP)

[12.] ASN Guide No. 30: Policy for the management of risks and drawbacks of INB/BNIs and the integrated management system for operators

[13.] ASN brochure - Control of the design and manufacture of equipment for basic nuclear installations

[14.] Approach for demonstration of nuclear safety – GU ORN HSE SUR 16

orano

9.3 REASON FOR REVISION

R0	**First issue.** This document is intended for ISO 19443-certified Orano suppliers. Its purpose is to identify and formalize the requirements of the Orano Group and its entities that complement the standard, with a view to controlling its activities and elements important to protection (AIP/EIPs) in the event that they are entrusted in whole or in part to external companies. The purpose of the document (Supplier Edition) is to: • To specify the practical expectations of the Orano Group and its entities in relation to ISO 19443: 2018, following the chapter headings of the standard for ease of reading; • Identify and formalize Orano's additional requirements in relation to ISO 19443: 2018 in table form (see paragraph 3); • Provide simple visual aids for understanding the differences and similarities between ITNS Elements/Activities (ISO 19443 standard) and IP Elements/Activities (INB/BNI Order) (see Appendix 3).

orano

CONTENTS

APPENDICES

Appendix 1 WORKING TOGETHER FOR NUCLEAR SAFETY

orano

Safety Culture
The Cornerstone of Nuclear Safety

Safety Culture is not something that you just declare to exist. It is something that you have to build and maintain on a daily basis. The awareness and acceptance of individual responsibilities are essential to developing this Safety Culture which is key to ensuring Nuclear Safety. This applies to everyone who plays a part in the lifetime of a facility from its design, the manufacturing of equipment, its construction and operation through to its definitive shutdown.

In what way do I play a part in nuclear safety?

- I am involved in the design and engineering, manufacturing, control, operation or maintenance of equipment that is important to the protection of interests.
- Through the activities I conduct, I ensure that nuclear safety requirements are met.
- I scrupulously comply with the documentation and applicable rules and I am aware that my actions can have consequences for Nuclear Safety.

Safety Culture

In order to adopt and develop its Safety Culture, every participant in the supply chain must:

- **Understand the risks** associated with the activity,
- **Adopt a questioning attitude** whatever its function may be,
- **Take a strict and careful approach,**
- **Raise the alert** as soon as weak signals or inappropriate behaviors occur.

Orano
125, Avenue de Paris
92320 Châtillon

Orano Quality Department

WORKING TOGETHER FOR NUCLEAR SAFETY

Practical guide for suppliers and their sub-contractors

«Safety culture is that assembly of characteristics and attitudes in organizations and individuals which establishes that, as an overriding priority, nuclear plant safety issues receive the attention warranted by their significance.»

SAFETY SERIES No.75-INSAG-4 (AIEA)

Quality Central Dyn. Orano - March 2020 - PO ORN QP HS 8

orano

OPI1: DIFFUSION LIMITEE / RESTRICTED

orano

Safety Culture
The Cornerstone of Nuclear Safety

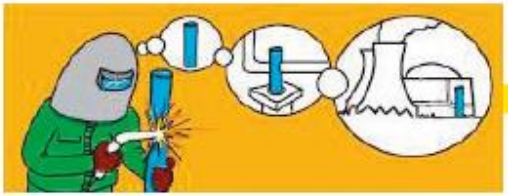
On a daily basis
I adopt a questioning attitude

I look for the right answers

The Protection of Interests includes occupational safety, nuclear safety, public health and hygiene, and the protection of nature and the environment.

Nuclear Safety includes all measures taken at all stages in the lifetime of a facility from design, manufacturing of equipment, construction, and operation through to its definitive shutdown to ensure its safe operation and to prevent incidents and limit their effects [French Nuclear Safety Transparency Act (Loi TSN), 2006].

Does my activity (design and engineering, manufacturing, intervention, etc.) have an impact on nuclear safety?

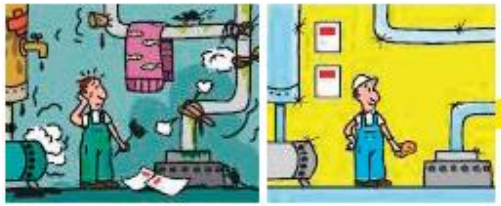


- I am aware of the importance and impact of my activity for the nuclear facility
- I know what the critical steps in my activity are and what the associated risks of error are
- I have received information about the applicable requirements from my management and it is clear to me what they are
- I make sure that I have passed on all the requirements that are applicable to my sub-contractors

How do I prepare for and carry out my activity?

- I prepare for my activity by ensuring that I have the qualifications and skills, and the necessary procedures, instructions, tools at my disposal
- I ensure that the environment in which I work does not have an impact on my ability to carry out my activity
- I work according to an applicable and approved procedure, and I comply with it strictly
- The performance of my activities which are important for protection is checked by a competent and independent third party
- I know and comply with the hold points and control points
- When I provide important information to a colleague or sub-contractor, I check that it has been received correctly and that my message has been understood. Conversely, when someone provides me with important information, I make sure that I have understood it properly
- When I propose improvements, I wait for them to be validated before applying them

How do I handle any difficulties related to my activity?



- I provide information about any difficulties encountered and I obtain the instructions necessary to correct and continue my activity
- If I am interrupted when performing my activity, I pause for a moment before resuming operations to assess the impact of the interruption
- I take the time to identify and report on deviations and problems encountered when performing my activity

Appendix 2 ADDITIONAL AND SPECIFIC REQUIREMENTS FOR RADIOACTIVE CLEANUP AND DISMANTLING SERVICES

This appendix sets out specific requirements for radioactive cleanup and dismantling activities, supplementing those set out in paragraphs 3 to 7 above.
All these requirements must be met by the supplier or service provider who has been granted CAEAR acceptance.

1. CONTEXT OF THE ORGANIZATION

Requirement No. 1
The requirements of this specification are all applicable. They are specified in greater detail for activities in domains D2, D3 and D4 subject to CAEAR acceptance.

Requirement No. 2
Companies working on Domains 2 and 3 must be CEFRI / QUALIANOR or equivalent. In particular, the company:

- takes into account the rules laid down in a document such as radiation protection instructions or rules for the site(s) concerned, which is given to the company,
- presents the process(es) for defining dosimetry targets in relation to risk, and for effective dosimetry monitoring. It also specifies the organization it implements to comply with the radiation protection rules laid down,
- specifies the methodology for taking into account the criteria leading to the implementation of the ALARA approach on worksites.

Requirement No. 3
The company describes in its "quality document" the entities concerned by the CAEAR acceptance procedure.

2. SUPPORT

Requirement No. 4
The company defines and lists the skills required for its activities, and how these skills will evolve over the duration of the CAEAR acceptance (according to the attached table 1).

Requirement No. 5
The company describes the conditions and level of qualification of its staff (operating and supervisory personnel) (as per table 2 attached).

Requirement No. 6
The company describes the procedures for managing training and accreditation of its personnel in connection with process implementation.

Requirement No. 7
The company describes the steps taken to ensure the suitability of the processes used and the qualifications of its employees.

3. OPERATIONAL ACTIVITIES

Requirement No. 8
The company lists the processes and resources it has mastered, and the associated operating procedures (as per table 2 attached).

Requirement No. 9
For each process, the company defines the operating conditions and qualifies the processes and resources used.

Requirement No. 10
The company defines its validation procedure for the processes used (pilot worksite, blank tests, endurance tests, etc.).

Requirement No. 11
The company defines the conditions for using its equipment, and the limits and constraints for its use.

Requirement No. 12
The company defines internal rules to ensure regulatory compliance of equipment used on worksites.

Requirement No. 13
The company defines the measures that will enable it to control radiological measurement and control techniques at its own level, as well as the procedures for their implementation.

orano

Table 1 – Changes in staff numbers at sites and/or local branches involved in cleanup/dismantling operations

	Pour l'ensemble de la société (effectifs)				
	N-2	**N-1**	**N**	**N+1**	**N+2**
Effectifs	0	0	0	0	0
Embauches	0	0	0	0	0
Départs en retraite	0	0	0	0	0
Autres départs anticipés (turn-over estimé,...)	0	0	0	0	0

	Nom (+ ville et dept) de l'établissement et/ou agence				
	N-2	**N-1**	**N**	**N+1**	**N+2**
Effectifs	0	0	0	0	0
Embauches					
Départs en retraite					
Autres départs anticipés (turn-over estimé,...)					

	Pour l'ensemble de la société (effectifs)						
Effectifs	Ingénieurs Cadres	Techniciens assimilés	Employés Ouvriers qualifiés	Agents non qualifiés	Autres	Total	Activité parfois sous-traitée (Oui / Non)
Administration / Finances							
Recherche & Développement							
Bureau d'études							
Achats / Planning / Ordonnancement							
Commercial / Marketing							
Chantier							
Qualité - Sureté - Radioprotection							
Autres à préciser (Service après vente, Informatique,...)							
Total (Dernière année)							

	Nom (+ ville et dept) de l'établissement et/ou agence locale N°1						
Effectifs	Ingénieurs Cadres	Techniciens assimilés	Employés Ouvriers qualifiés	Agents non qualifiés	Autres	Total	Activité parfois sous-traitée (Oui / Non)
Administration / Finances							
Recherche & Développement							
Bureau d'études							
Achats / Planning / Ordonnancement							
Commercial / Marketing							
Chantier							
Qualité - Sureté - Radioprotection							
Autres à préciser (Service après vente, Informatique,...)							
Total (Dernière année)							

Nom (+ ville et dept) de l'établissement et/ou agence locale N°2						
Ingénieurs Cadres	Techniciens assimilés	Employés Ouvriers qualifiés	Agents non qualifiés	Autres	Total	Activité parfois sous-traitée (Oui / Non)

orano

Table 2 – Justification of skills, technical means and resources

Compétences techniques relatives à l'assainissement radioactif et au démantèlement par domaine		D2	D3	D4	Eléments concourant à la maîtrise sous les aspects organisationnels, de compétences, de la documentation et du REX,	Pour l'ensemble de la société			Pour l'établissement et/ou agence locale N°1		
						Moyens techniques (1)	Moyens humains (nb pers.)	Niveau de compétence (2)	Moyens techniques (1)	Moyens humains (nb pers.)	Niveau de compétence (2)
Organisation de chantier	Organiser un chantier de démantèlement		X	X		xx	yy	zz			
	Concevoir/assurer/respecter la Sécurité des chantiers de démantèlement		X	X							
	Savoir analyser les risques liés aux opérations de démantèlement		X	X							
Gestion de projet	Gérer des projets qui ne remettent pas en cause la conception		X	X							
	Gérer des projets qui remettent en cause la conception			X							
Radioprotection	Détecter les rayonnements : balises, appareillages, dosimètre etc.	X	X								
	Détecter les rayonnements : réaliser des cartographies	X	X								
	Gérer les sources radioactives	X	X								
	Contrôler les sources radioactives	X	X								
	Connaissance et mise en œuvre du principe ALARA	X	X	X							
	Protection contre les expositions externes et internes :	X	X	X							
	- écrans, criticité	X	X	X							
	- enceintes de confinement cellules etc.	X	X	X							
Déchets	Aptitude à travailler sur des déchets :	X	X								
	Déchets α	X	X								
	Déchets β g	X	X								
	Concevoir le zonage déchets		X	X							
	Concevoir l'entreposage temporaire et stockage	X	X	X							
	Caractériser et classifier les déchets	X	X	X							
	Optimiser la production de déchets : concevoir la stratégie, les scenarii, la filière de recyclage des déchets radioactifs, le recyclage des matières existantes, l'évaluation et planification du démantèlement			X							
	Gérer les déchets (niveau exécution)	X	X								
	Mettre en œuvre le traitement et le conditionnement des déchets solides	X	X								
	Mettre en œuvre le traitement et le conditionnement des effluents radioactifs	X	X								
	Connaître les emballages, les colis	X	X	X							
	Connaître la caractérisation des déchets	X	X	X							
	Connaître les filières d'évacuation	X	X	X							
	Connaître les transports déchets solides et des effluents			X							
	Techniques maîtrisées de décontamination	X	X								
Transverse	Analyser de la sûreté (y compris la dimension FOH)		X	X							
Travaux d'assainissement et démantèlement	Assainissement par chiffonette, ou autres	X	X								
	Autres techniques (Gels, Cryo, …)		X								
	Travail par télémanipulateurs	X	X								
	Outils à distance spécifiques		X								
	Robotique : engins de chantier télécommandés, porteurs		X								
	Engins de levages de zone 4 UL - ponts de maintenance - pont perche	X	X								
	Equipements individuels d'intervention en milieu hostile		X								
	Assistance habillage deshabillage & air respirable	X	X								
	Assainissement radioactif / Réduction de volumes : intervention sous eau		X								
	Assainissement radioactif / Réduction de volumes'intervention sur béton		X								
	Assainissement radioactif / Réduction de volumes matériaux métalliques	X	X								
	Dimensionnement et et mise en place de ventilation d'intervention		X								
	Dimensionnement et et misee en place le confinement, sas rigide, souple, ignifugés démontage, repli de chantier, contrôle		X								
	Concevoir une stratégie de démantèlement intégrant l'objectif de travailau contact ou de rdv à distance - impact planning, déchets, effluents, dosimétrie…. Formalisation argumentaire de choix			X							
	Evaluation de l'impact sûreté du scenario proposé - capacité à proposer des options selon les risques probables		X	X							
Exploitation d'installation et intervention	Maintenance 1er niveau	X									
	Contrôle périodique installation dédiée,	X									
	Maitrise du référentiel sûreté	X	X	X							
	Connaissance CMN / Protection physique	X	X	X							
	Gestion des produits chimiques	X	X								
	Gestion des consommables	X	X								
	Surveillance des fonctions de sûreté (ventilation, CRP, confinement, ..)	X	X								

(1) : Préciser les moyens disponibles déjà utilsés en situation, les moyens projetés, les codes de calcul,…

(2) : Niveaux de compétence: 0: Aucune S: Sous-traité D: Débutants E: Expérience M: Maîtrisé R: Etudes & Recherches

Appendix 3 Activity/Element Important for Nuclear Safety versus Activity/Element Important for Protection

RISKS	**Radiological impacts**	**Activities/ Elements Important to Nuclear Safety (ITNS as defined in ISO 19443:2018)** **-** Activities**/**Elements (product, service, item or activity), whose failure would have direct or indirect consequences on the control of nuclear safety functions (could result in undue radiation exposure of people or the environment)
	Non-radiological impacts (conventional risks)	**Activities/Elements important for Protection / Conventional risks** - Activities/Elements whose failure would have consequences for functions related to non-radiological accidents (containment of hazardous substances, protection of people and the environment against the effects of hazardous phenomena)
DRAWBACKS	**Water withdrawals and discharges, nuisances**	**Activities/Elements important for Protection / Drawbacks** - Activities**/**Elements whose failure would have consequences for functions related to drawbacks (health impacts, environmental impacts)
		Activities/Elements important for Protection (EIP per AINB 2012)

In order to guarantee the same level of requirements for nuclear safety or protected interests, Orano asks its suppliers to consider all the EIPs and AIPs it has identified, as ITNS to be handled in accordance with the requirements of ISO 19443 and the additions introduced by this specification.

AIP /EIP = IPSN

Appendix 4 Ethics & Compliance flyer

orano

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?

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?

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?

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?

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?

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?

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.