

# NUCLEAR SAFETY COUNCIL CODE OF ETHICS



2020-2025

**CODE OF ETHICS  
OF SPANISH NUCLEAR SAFETY COUNCIL  
2020-2025**

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Consejo de Seguridad Nuclear

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## 1. INTRODUCTION

The Spanish Nuclear Safety Council (CSN), at plenary session nº. 1528 held on June 17, 2020, approved a new CSN Strategic plan for the 2020-2025 period. The previous Code of ethics was approved by the CSN at the Plenary session held on June 1, 2016, in line with the Strategic plan for the 2011-2016 period.

This new Strategic plan establishes two strategic goals: one aimed at nuclear and radiological safety, and the other aimed at achieving the sustainable development goals.

The plan describes the strategic goals established by the agency and its strategic objectives by identifying and setting Key Performance Indicators (KPIs) that allow the CSN to monitor and analyze whether it has achieved these objectives and carried out its activities. The strategic goal with regard to sustainability is also cross-cutting in nature and is implemented throughout all its processes.

The CSN's Strategic plan for the 2020-2025 period sets out the organization's mission, vision and values.

The changes introduced in the CSN's new Strategic plan have made it necessary to revise the organization's Code of ethics approved in 2016, to ensure the consistency of both documents.

The Code of ethics approved by the CSN at its session held on June 1, 2016 identifies six values of the organization, which are listed below:

1. Independence and neutrality.
2. Integrity.
3. Commitment.
4. Competence/Excellence.
5. Responsibility.
6. Transparency.

These values are still applicable in the CSN's new Strategic plan for the 2020-2025 period, but have been expanded to include new values such as rigor, truthfulness and reliability. In addition, this plan shows

the CSN's commitment to achieving the Sustainable Development Goals (SDGs) included in the Spanish Government's 2030 Agenda, following the commitment entered into by Spain on September 25, 2015 to the 17 SDGs of the United Nations and to meeting these goals by 2030. This means that a new value related to sustainability had been added.

This updated Code of ethics, like the previous version, does not intend to change the structure, organization or content of the obligations of the CSN's senior management, civil servants and other personnel, nor does it seek to establish behavioral guidelines for its recipients in its regulatory activities. Its objective, rather, is to ensure that the organization's ethical values are explicitly laid out, promoting awareness of these values and their acceptance by all personnel.

This document is intended to be a key element in the organization of the CSN, and a cornerstone in the way in which duties are carried out and the CSN's obligations are fulfilled. This code establishes how its personnel should follow and put into practice the values by which the organization is governed.

This Code of ethics falls within the sphere of ethics and aims to specify the common values and principles of the CSN. It therefore does not contain any obligations already provided for in Royal Legislative Decree 5/2020, of October 30, approving the consolidated text of the Law on the Basic Statute of Public Employees; Spanish Law 3/2015, of March 30, regulating the exercise of senior management in the central government; the Law on transparency, access to public information and good governance; and any other regulations that may be applicable.

The interpretation of the values and the proposal of any action in relation to possible deviations from the Code of ethics, as well as subsequent amendments, will be governed by that established in management procedure PG.XI.05 *Implementation and monitoring of the Code of ethics*, which must be reviewed, if considered necessary, following the approval of this updated Code of ethics at the plenary session.

## 2. VISION AND MISSION

An organization's vision outlines how it would like to ultimately achieve and address its purposes over the long term and an organization's mission is its specific purpose, describing the reasons that gave rise to its creation, as well as its enduring characteristics.

The values detailed in this Code of ethics come from both its vision and mission.

The behavior of all CSN personnel, their ethical perspective, both in their work at the organization and in the rest of their day-to-day activities, must be in line with the values promoted by this code, since it is the cornerstone for adequately implementing the CSN's mission and vision.

The CSN's ethical commitment is aimed at ensuring maximum quality in the performance of its functions and competences as a public service entity and in the ongoing training and development of its employees in order to work together in the pursuit of excellence.

The 2020-2025 Strategic plan defines the mission and vision as follows:

**MISSION:** Protecting exposed workers, the public and the environment from the harmful effects of ionizing radiations, enduring that nuclear and radioactive facilities are safely operated by their licensees and establishing prevention and correction measures against radiological emergencies regardless of their origin.

**VISION:** The CSN shall continue to be the reference regulator. Through application of the best national and international practices, the Council shall strengthen public confidence and trust. It should also promote excellence in its regulatory decisions by exercising competence, knowledge and reliable communication. Furthermore, the CSN should also foster actions aimed at having the necessary human and economic resources while promoting a sense of organizational ownership within its employees.

## 3. OBJECTIVES OF THE CODE OF ETHICS

The objectives of this Code of ethics are as follows:

- Identify and promote the organization's values, as well as the behaviors and how they are integrated into the professional activity of all personnel, both individually and collectively, in carrying out the functions and competencies of the Nuclear Safety Council.
- Establish the organization's own code of conduct consistent with that established in Royal Legislative Decree 5/2020 and Law 3/2015 mentioned above.
- Consolidate a climate of trust within the CSN by serving as a vehicle for socialization and cohesion, and allowing for the development of a safe, welcoming environment that protects against retaliatory actions or seeking blame.
- Strengthen stakeholder trust in the CSN.
- Commit to achieving the Sustainable Development Goals (SDGs).

In summary, the values laid down in the CSN Code of ethics constitute a point of reference for improving nuclear safety, radiological protection and physical protection by increasing the agency's safety culture.

## 4. SCOPE OF APPLICATION

### TO WHOM DOES THIS CODE OF ETHICS APPLY?

The Code of ethics is applicable to all personnel of the Nuclear Safety Council, regardless of their hierarchical position in the organization, and regardless of whether or not they are working for the institution on a permanent or temporary basis.

The Code of ethics also applies to CSN accredited personnel, such as, for example, inspectors of the autonomous communities assigned certain functions, provided they are acting in their capacity as personnel accredited by the CSN in the performance of the functions entrusted to them.

Likewise, as a general rule, the Code of ethics applies both to external personnel providing services to the CSN, especially those whose job position is at the organization's head offices, and to anyone on a temporary posting at the CSN headquarters.

### WHEN DOES THIS CODE OF ETHICS APPLY?

This Code of ethics must be applied and observed:

- As long as they form part of the Nuclear Safety Council organization.
- When performing activities or tasks on behalf of the Nuclear Safety Council.
- When using the systems, corporate computer applications and material owned by the CSN.
- When directly or indirectly associated with the CSN.

### WHY IS IT IMPORTANT TO APPLY AND FOLLOW THE CODE OF ETHICS?

The Code of ethics establishes how the organization's personnel must conduct themselves and put into practice the values by which the organization is governed in order to fulfill its mission and vision.

### WHEN WILL THIS CODE OF ETHICS COME INTO FORCE?

This Code of ethics has been in force since its approval by resolution at the CSN's plenary session nº 1615 held on February 23, 2022.

## 5. CSN VALUES

The shared values by which the organization is governed embody its deepest convictions, making it possible to carry out its functions and competencies with the ability to adapt in a process of continuous improvement.

The CSN's shared values that make up the organization's Code of ethics are as follows:

- Sustainability.
- Independence and neutrality.
- Commitment.
- Integrity.
- Competence and excellence.
- Accountability.
- Transparency.
- Rigor, veracity and reliability.

All CSN personnel must be committed to these values in the performance of their duties and obligations, and to establishing and maintaining the trust of their colleagues and the public.

To facilitate this commitment and compliance with these values, the CSN will extensively communicate these values internally to public sector entities and externally to the private sector, civil society, individuals and stakeholders, requesting that all parties involved respect the values and standards governing the CSN in their activities and behavior.

These values are defined below, along with a description of the attitudes and actions required to achieve them.



## SUSTAINABILITY

### DEFINITION

To act so that developments that meets the needs of the present do not compromise the potential of future generations, ensuring a balance between economic growth, care for the environment and social well-being.

The management of the CSN will be aimed at achieving the Sustainable Development Goals (SDGs) by 2030.

### HOW TO ACHIEVE IT

- By managing the agency so as to achieve the Sustainable Development Goals (SDGs) by 2030.
- By ensuring that specific activities and indicators are included in the annual work plans in order to comply with the 17 SDGs.
- By adopting behaviors such as appreciating nature, and maintaining satisfactory levels of training and awareness.
- By adopting behaviors aimed at caring for the work environment with ecological awareness regarding the use of paper, water and energy.





## INDEPENDENCE AND NEUTRALITY

### DEFINITION

To act and make decisions with independence, objectivity and impartiality.

### HOW TO ACHIEVE IT

- By acting independently of government and public authorities, of political interests, of those responsible for the facilities and activities, of the media and, in general, of all players with an interest in matters falling within the scope of competence of the CSN, with a view to preserving its independence of judgement and ensuring its organization in order to avoid conflicts of interest in carrying out its mission.
- By avoiding any influence at the regulatory level that is contrary to the CSN's mission.
- By basing final decisions on the results of thorough, impartial and objective technical work.
- By acting with absolute objectivity and independence of judgement, avoiding any bias that could undermine them.
- By refusing to take a stance, within the sphere of any regulatory action, for or against the use of nuclear technology and ionizing radiation in any of their applications.
- By acting impartially and not providing any preferential treatment to private organizations or individuals.
- By complying with all laws and regulations that provide equal opportunity to all citizens regardless of race, color, religion, gender, nationality, age or ability.



## INTEGRITY

### DEFINITION

To act with honesty in carrying out professional duties and when making decisions.

### HOW TO ACHIEVE IT

- By recognizing that integrity is a cornerstone of the overall good governance system, safeguarding public interest and reinforcing values such as commitment to a pluralistic democracy based on compliance with legislative framework and respect for human rights.
- By recognizing that the CSN is a public service and therefore we must ensure public integrity, understood as the consistent positioning and adherence to common ethical values, as well as the set of principles and rules aimed at protecting, maintaining and prioritizing the public interest over private interests.
- By acting with integrity, honesty and sincerity so that the most thorough test/judgement could be passed. This means that opinions and decisions are based on evidence and that real, apparent or potential conflicts of interest between professional duties and private interests are avoided.
- By being frank and honest in our professional opinions and about the knowledge we have and the experience acquired.
- By respecting the law and public duty in decision making.
- By reporting in a responsible manner any actions detected that are contrary to the Code of ethics.
- By reporting, through the appropriate channels, any known facts that affect or may affect the safe operation of the facilities and activities, and never abusing authority.
- By investing in integrated leadership in order to demonstrate the CSN's commitment to integrity as a public service entity, in aspects such as selection, appointment or promotion criteria for positions of responsibility, evaluating the performance of managers at all levels of the entity and developing management frameworks that promote managerial responsibilities to identify and mitigate integrity risks.
- By providing the organization's personnel with appropriate training, guidance and advice on the application of public integrity standards at the workplace to equip them with the skills necessary to analyze ethical dilemmas.
- By avoiding any conflicts of interest between duties.
- By conducting activities in a non-partisan and objective manner, providing information, analysis and opinion that allows for objective and informed decision making.
- By showing consistency between what is said and what is done.





## COMMITMENT

### DEFINITION

An attitude that entails becoming aware of the importance of individual contribution to fulfill the CSN's mission and achieve its objectives.

### HOW TO ACHIEVE IT

- By becoming aware of the CSN's mission, vision and values
- By carrying out tasks with professionalism, responsibility, loyalty to the institution and technical rigor.
- By rigorously applying knowledge and experience to the performance of professional activities.
- By showing willingness and an attitude to question any matter, in a constructive way, in order to contribute ideas and seek solutions to different challenges.
- By encouraging communication with other employees, and team building.
- By having a proactive attitude in the transmission of the values and principles of this Code of ethics.
- By ensuring the implementation of the appropriate legislative and institutional frameworks that allow for the effective management of all the CSN's activities, as well as those of the personnel that carry out these activities.
- By demonstrating exemplary personal behavior and a high level of decorum in carrying out the CSN's duties.
- By assuming responsibility for public service, ensuring that citizens feel confident that the agency's actions are in their own best interest. This includes adequate management of public funds and of the CSN's properties and resources, while respecting personal, restricted or confidential information in accordance with applicable regulations.
- By fostering a sense of belonging to the CSN and to the public service it provides.
- By constantly monitoring quality in the performance of our functions, ensuring the commitments assumed with management and the public are met, and ensuring that the reports issued are in line with the organization's standards.



## COMPETENCE AND EXCELLENCE

### DEFINITION

The systematic, individual and collective pursuit of continuous improvement of professional activities, on the basis of knowledge and experience, aimed at optimal fulfillment of the CSN's mission and achievement of its objectives.

### HOW TO ACHIEVE IT

- By striving for the pursuit and achievement of excellence in work, through a dedicated, competent and professional attitude.
- By carrying out professional activities effectively and efficiently.
- By incorporating the best professional and interpersonal knowledge and skills, as well as improvements in the quality of policies, procedures, and services carried out by the organization.
- By sharing knowledge and experience internally and externally (other regulatory bodies, national and international reference institutions and professional associations related to nuclear safety and radiological protection).
- By promoting innovation and new ideas to improve the value and performance of our services.
- By learning from mistakes, experience, lessons learned and best practices internally and externally.
- By making efficient use of the available resources, each within the framework of their respective competences and responsibilities, and by prioritizing their use in order to fulfill the CSN's mission.
- By ensuring human resources management in the organization of the CSN in which the principles of merit and transparency are applied, promoting professionalism among personnel in the performance of their functions, and avoiding favoritism and nepotism in the selection and promotion processes (promoting meritocracy).



## ACCOUNTABILITY

### DEFINITION

The ability to recognize and accept the consequences of the decisions made.

### HOW TO ACHIEVE IT

- By establishing precise goals at the different organizational levels for the design, management and implementation of integrated management system components.
- By ensuring that all personnel of the organization have the resources, skills and authority necessary to perform their duties.
- By promoting vertical and horizontal collaboration mechanisms among the organization's personnel. By ensuring that discussions are open, honest and respectful, where important points are identified, different points of view and dissenting opinions are valued, and with an attitude of actively listening to the different approaches identified by others. By promoting consistency, and avoiding any overlapping and gaps.
- By avoiding inappropriate behavior such as rudeness, intimidation, harassment, threats and aggression.
- By accepting the consequences of one's own decisions and actions, and not passing them on to subordinates and/or the rest of the organization for no objective reason.
- By being aware of the fact that when carrying out professional activities they are representing the regulatory body, not only themselves or the unit, team or department to which they belong.
- By exercising the powers granted in accordance with the principles of good faith and dedication to public service and by refraining from any action that could compromise the fulfillment of the agency's mission and/or damage its institutional reputation.
- By maintaining discretion and professional secrecy, by respecting and protecting confidential information, security information and proprietary information obtained in the performance of their duties, even after such duties have ended.
- By allocating the financial and material resources available to the sole and exclusive purpose of fulfilling the CSN's mission, through the sustainable use of these resources.



## TRANSPARENCY

### DEFINITION

A set of actions and provisions through which the organization provides CSN employees, citizens and stakeholders with access to information within the scope of its competences.

### HOW TO ACHIEVE IT

- By promoting a culture of transparency at the organization where ethical dilemmas, staff concerns and errors can be freely discussed and where the organization's staff interact in a transparent manner (exchange of information, knowledge).
- By providing technical and legal justification for regulatory decisions and communicating them internally and to those responsible for the facilities, citizens, the media and to stakeholders in general.
- By providing information, both internally and externally, on the arguments and criteria used when making decisions regarding the agency's plans and strategies.
- By making channels available for expressing concerns or complaints regarding potential infringements of the values that make up the Code of ethics, through the use of the Code of ethics mailbox available to all personnel on the CSN intranet.
- By making information available to stakeholders and citizens, through the appropriate communication channels, on actions, processes and decisions made based on the principles of rigor, truthfulness, accuracy and intelligibility, as soon as possible in a manner that is compatible with these principles.
- By making channels available to stakeholders and citizens for requesting information and reporting potential infractions through the CSN transparency portal available on the organization's institutional website.
- By ensuring actions associated with decision making are transparent and can be objectively verified.



## RIGOR, VERACITY AND RELIABILITY

### DEFINITION

To act scrupulously in accordance with applicable regulations in achieving the CSN's objectives.

By providing information to stakeholders in such a way so as to respond to the reality of what is being asked and with the required quality, in order to obtain their respect based on acceptance of the regulatory decisions.

By acting consistently and congruently under similar conditions.

### HOW TO ACHIEVE IT

- By leading by example and working with a vocation to public service.
- By developing the skills of teams and individuals to search for efficient and innovative solutions.
- By using evidence-based information and methodologies, guaranteeing their traceability and using review and verification procedures in accordance with the importance of the decisions to be made.
- By protecting the reputation and image of the agency. We are all responsible for taking care of the organization's image and reputation.
- By carrying out the agency's work in accordance with the rules and procedures in place so as to be accountable at all times for the actions taken.
- By providing adequate training initially and on an ongoing basis.
- By analyzing performance, obtaining lessons learned and applying best practices.

## 6. PRINCIPLES OF ETHICAL BEHAVIOR

Regardless of their position or function, CSN personnel are expected to conduct themselves in accordance with the values included in this Code of ethics. Therefore, the following behavioral guidelines are given:

- Help maintain the values and ethical behavior of CSN personnel by encouraging them to express their concerns, contribute new and innovative ideas or opinions or report potential infringements of these principles through the use of the Code of ethics mailbox available to all personnel on the CSN corporate intranet.
- Behave so as to cooperate with colleagues by making suggestions and providing constructive criticism aimed at improving the work.
- Always keep in mind that all CSN personnel expect to be treated in accordance with the ethical values and behavior established in this Code of ethics.
- Maintain the commitment to safety, excellence and public service.
- Continually demonstrate integrity and responsibility when carrying out duties.
- Always do the right thing in accordance with the agency's ethical values, behaving honestly and acting with frankness and sincerity in both professional and personal matters.
- Do not just do what is legal in accordance with applicable regulations and procedures, but do what is right.
- Always represent the CSN, both in Spain and abroad, with prudence, honesty, frankness and maximum objectivity when referring to facts and opinions.
- Maintain due confidentiality and secrecy in matters relating to your professional activity, especially when the information is of a sensitive nature and its dissemination could be detrimental to the proper conduct of the organization's business.

## WORK ENVIRONMENT

- Make teamwork a priority, taking into account that the objectives to be achieved must be shared by the entire organization.
- Contribute to the creation of a diverse and inclusive work environment, ensuring that CSN personnel are open to knowing and respecting the opinions of others and sharing available knowledge, so that each CSN employee feels that they contribute constructively and successfully to the operation of the organization.
- Respect and value the richness that comes from the diverse points of view, talent and experience of the people who belong to the organization.
- Recognize that reaching an internal consensus is not always possible.
- Comply with CSN policies regarding equal criteria and opportunities for all professionals regardless of race, creed, color, nationality, age, gender, sexual orientation, marital status or abilities.
- Facilitate access for all personnel to work-life balance plans in accordance with the rules of the Spanish central government.
- Promote equal treatment among all CSN personnel, respecting and demanding the same behavior from all of them.
- Strive to achieve a safe and healthy work environment that contributes to the achievement of personal and professional objectives, avoiding any circumstance or conduct that is bothersome or harmful to others.
- Promote the establishment of relationships based on respect for the dignity and professionalism of others, participation, equity and mutual collaboration by providing a respectful work environment and a positive work atmosphere.
- Do not tolerate discrimination, verbal or physical abuse, or offensive behavior by co-workers or by regulated parties or stakeholders related to the organization. Inform management of any incident that takes place.

## CULTURE OF DIALOG

- Maintain an attitude of asking questions and constructive criticism on matters that may raise doubts or disputes.
- Always maintain a critical and questioning attitude towards safety, free from fears or concerns about possible negative repercussions. This attitude will ensure proper decision making and not institutionalize bad practices.
- Resolve any disagreements through the CSN management system procedures established for this purpose, which grant any professional the right to express their opinion.
- Feel not only the right, but the obligation, to express your own points of view and resolve discrepancies or different technical opinions in a professional manner through the systems provided by the organization.

## CONFLICTS OF INTEREST

- Shape opinions and make assessments and decisions without being influenced by other factors besides professional judgment, ensuring that they are based on evidence and maintaining an image of impartiality.
- Prevent private interests from prevailing over those of the CSN.
- Act in accordance with the law in the event of any situation that may be indicative of a conflict of interest.



## 7. PRINCIPLES OF ETHICAL BEHAVIOR IN TELEWORKING

At the CSN's plenary session n°. 1582 held on June 23, 2021, they approved a work model applicable to CSN personnel for providing services through teleworking.

This new teleworking model includes specific aspects that require ethical behavior that is different from that required when providing services in person. Teleworking means that employees perform their work outside the CSN offices, at the employee's private residence, thus requiring the extensive use of information technologies to do so. There are new aspects to this new model of work that require seeing past the need for immediate physical presence and breaking away from idea of being limited to the work environment, which gives rise to additional needs in terms of the responsibility and autonomy of the employee, and flexibility with regard to carrying out the work.

A priori, the behavioral principles set out in section VI of this Code of ethics are valid, although they need to be adapted to the particular nature of working remotely outside the physical environment established at the CSN headquarter.

A set of principles related to maintaining honest and responsible behavior when carrying out professional activities under the teleworking model are listed below.

- **Performance of activities in due time and form.** Complying with the principles of honesty and responsibility means carrying out the tasks and work assigned, as well as follow up by the hierarchical managers.
- **Maintain a respectful work environment.** Teleworking causes communication to become depersonalized, which can lead to or facilitate verbal abuse or offensive behavior. Regardless of the means of communication used — phone, email, virtual platfors —, the forms of communication must be respectful

and associated with the organization's values and behavioral principles.

- Encourage communication and work follow-up meetings, taking into account that **when working remotely as a team** employees need to pay attention to and be respectful of everyone's personal time.
- **Separate family and work.** Although the workplace is the home, working hours must be dedicated to work; therefore, guidelines should be established to separate work from family or domestic activities.
- **Adequate organization of time.** The new way of working may be associated with a change in the way the workload is managed. Activities should be planned taking into account the time in which the tasks assigned must be fulfilled, encouraging progress in response to the objectives established.
- **Proper use of the resources provided by the organization.** Not only must employees take care of the equipment provided by the CSN, but also the information handled. Employees must therefore follow the recommendations made by the CSN as part of the process of practical implementation of the teleworking model for providing services.
- **Frequently check communications made through the corporate intranet.** Teleworking is carried out largely alone, without contact with the rest of the team, which can lead to an increase in the degree of separation and professional isolation; therefore, employees should keep track of any notices, news and communications that are published through the corporate intranet on a daily basis.
- **Communicate concerns or challenges.** The teleworking may give rise to situations that raise concerns or pose a challenge for employees. The CSN is therefore committed to maintaining a policy of active listening in order to build and maintain an organizational culture based on trust, and in this regard the communication of ideas, opinions, concerns or complaints is encouraged through the use of the Code of ethics mailbox available to all personnel on the CSN corporate intranet.

- Since the services will be provided out outside the CSN's offices, employees must pay attention to aspects related to **data protection, information and data processing, and cybersecurity**.
- Be aware of potential situations of isolation that may be expressed or perceived by team members.

## 8. UPDATING, IMPLEMENTATION AND FOLLOW-UP OF THE CSN CODE OF ETHICS

The system associated with the implementation and updating of the CSN Code of ethics is established in the management system procedure with reference PG.XI.05.

**With regard to updating the Code of ethics**, that established in section 5.4. of procedure PG.XI.05 rev.0 will apply.

**As regards the implementation of the Code of ethics**, the Council will ensure that the members of the CSN Board and all CSN personnel are aware of this code through the following:

- Its dissemination on the organization's corporate intranet.
- Training that will be provided to CSN employees, giving priority to new personnel, and that will be regularly included in the organization's training plan, making participation in these courses mandatory.

**With regard to following up on the implementation of the Code of ethics**, that established in section 5.6. of procedure PG.XI.05 will apply.

The practical implementation of the Code of ethics should be monitored and overseen so as to reinforce the role of supervising and maintaining the organization's integrity in carrying out its functions, in particular:

- It must facilitate organizational learning, guaranteeing responses to the initiatives submitted through the communication mechanism made available to employees and obtaining lessons learned after analyzing and completing these initiatives, which also include measures for continuously improving the system.
- It must promote transparency and openness by facilitating free access to information on the initiatives received in relation to the Code of ethics, the result of the analysis performed and the final decision made by the Management System and Information Security Committee.



## 9. USING THE CODE OF ETHICS

The CSN Code of ethics should not remain a set of words that make up just another document within the organization's documented policies.

In accordance with that established in Law 15/1980, of April 22, which created the organization, the CSN is a public-law entity, independent from the Spanish central government, with its own legal personality and independent from that of the State, and is the only competent authority for nuclear safety and radiological protection, which is why the public has placed its trust in us. Therefore, CSN employees must always behave in such a way as to honor and be worthy of the organization.

Only by continuously demonstrating our commitment to the values and behavioral principles established in this Code of ethics will we be worthy of the trust placed in us by citizens and stakeholders.

At the same time, in order to fulfill our role as a regulatory body, we must create and maintain a diverse and inclusive work environment that allows opinions to be expressed freely, without fear of reprisal, and that promotes respect and values the richness that comes from the diverse points of view, talent and experience of the people who belong to the organization.

In this regard, all CSN personnel are encouraged to submit, through the means provided by the organization for this purpose, queries on any matter relating to compliance with the values of the Code of ethics, their own behavior or that of their colleagues. These actions will undoubtedly help in developing and supplementing the organization's values and the behavioral principles of its staff in accordance with any new needs that may arise.

Suggestions for improving the processes for monitoring and implementing the Code of ethics are also encouraged.

### PREGUNTAS QUE PUEDEN AYUDARNOS EN LA UTILIZACIÓN DEL CÓDIGO ÉTICO

Should CSN personnel find themselves in a situation that they consider might be subject to any of the indications included in this Code of ethics, the first thing they can do, once they have identified the problem, is to analyze it rationally, sensibly and in an attempt to reach the best decision from among all possible options. It may be useful to ask the following questions:

- Is my decision or action contrary to the law and regulatory framework in force?
- Is my decision contrary to the mission, vision and values set out by the CSN?
- Is my decision or action conditioned by family, economic or other interests?

If the answer to any of the above questions is yes, do not make that decision or do not carry out that action.

If, on the other hand, all the answers are no, go ahead and ask yourself the following questions:

- Have I considered all applicable standards and weighed the ethical principles and guidelines contained in this code?
- Have I considered whether my action or decision may have a negative social, economic or environmental impact?
- Would I feel confident in explaining my action or decision to my colleagues?
- Would I be willing to have my decision or action made public?

If any of the answers are no, follow the guidelines below:

- Always look for solutions that are best in line with the CSN's mission, vision and values.
- If you are unsure about what decision to make or how to act in a particular case, consult your manager or submit a request to the Code of ethics mailbox.

## 10. CONTACT US

The CSN's commitment to its values and ethics is a fundamental part of its organizational culture. The observance of and compliance with our Code of ethics, as well as the management of situations that could compromise our values, are part of our commitment to integrity and professional excellence.

All CSN personnel have the professional and moral obligation to communicate possible deviations from the values and behavioral principles that make up our Code of ethics and, therefore, we have made a Code of ethics mailbox available to all personnel on the corporate intranet, which is available at the following address: [codigo.etico@csn.es](mailto:codigo.etico@csn.es).

The CSN wishes to establish and promote a means of communication through this mailbox whereby employees may submit queries or report deviations with regard to the provisions of this code, always with the maximum guarantee of confidentiality.

The identity of the person making a communication through this channel will be considered confidential information and their data may only be provided to the administrative or judicial authorities, to the extent required by such authorities as a result of any administrative or court proceedings initiated. Data will always be transferred in full compliance with current legislation on personal data protection.

### WHAT DOUBTS OR QUESTIONS ABOUT ETHICAL ISSUES CAN YOU RAISE?

- Any aspect related to the CSN's values and behavioral principles, as well as any matter related to ethics. Whenever an employee feels that they need advice or guidance on how to deal with a matter related to these issues, they can use the aforementioned communication channel.
- These may be issues that arise in day-to-day work and solutions may not always be easy to adopt.
- Rest assured that any initiative submitted will be treated with respect and in accordance with the system established for this purpose through the procedures of the organization's management system.

