



# Fermilab Code of Business Ethics and Conduct

# We are one Fermilab



**Everyone is worthy of respect**



**Encourage discussion**



**Genuinely listen**



**Collaborate**



**Respect the messenger**



**Have courage**



**Own your voice**



**Be kind**



**Fresh perspectives lead to innovation**



**Encourage others to speak**



**Own it, mistakes happen**



**Share the air**

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## About Fermi Forward Discovery Group, LLC

Fermi Forward Discovery Group, LLC (FermiForward) is a nonprofit limited liability corporation formed under the laws of the State of Delaware. FermiForward is the Management and Operating (M&O) contractor for the Fermi National Accelerator Laboratory (Fermilab) under Contract No. 89243024CSC000002 with the United States Department of Energy (DOE), effective January 1, 2025.

FermiForward was formed by members the University of Chicago (UChicago) and Universities Research Association, Inc. (URA) for the sole purpose of becoming the M&O contractor of Fermilab for DOE's Office of Science (SC). FermiForward brings the expertise of integrated subcontractors Amentum and Longenecker & Associates to the management and operation of Fermilab. FermiForward also has strong partnerships with leading research universities and institutions in the United States and around the world.

FermiForward manages and operates Fermilab through its employees. Fermilab is the collection of real property, facilities, and personal property owned by the United States Government, through which the science mission of the United States Department of Energy is pursued. DOE also has a Fermi Site Office with government employees located at Fermilab.

## Vision and Mission of Fermilab

Fermilab is America's particle physics and accelerator laboratory. Fermilab's vision is to solve the mysteries of matter, energy, space, and time for the benefit of all. Fermilab strives to:

- lead the world in neutrino science with particle accelerators
- lead the nation in the development of particle colliders and their use for scientific discovery
- advance particle physics through measurements of the cosmos.

Fermilab's mission is to drive discovery by:

- building and operating world-leading accelerator and detector facilities
- performing pioneering research with national and global partners
- developing new technologies for science that support U.S. industrial competitiveness.

## About this Code

This Code of Business Ethics and Conduct (Code) provides an overview of the contractual, legal, and regulatory requirements governing ethics and conduct for FermiForward as an organization and its employees. The Code is a compilation of key policies and requirements related to employee behavior and interactions, but the Code does not include all policies, procedures, and requirements that apply to FermiForward and its employees.

This Code applies to all FermiForward employees. FermiForward employees must review the Code and referenced policies and standards. FermiForward employees who violate the Code or the referenced policies and standards may be subject to disciplinary action up to and including termination of employment. If appropriate, FermiForward may take civil legal action or refer violations to the appropriate authorities for regulatory, civil, or criminal action.

This Code is not a contract and is not intended to create any obligations on FermiForward. It may be terminated or changed by FermiForward at any time, with or without notice.

## Statement of Community Standards

The community at Fermilab is broad and diverse, and it includes FermiForward employees as well as users and affiliates, collaborators, and subcontractors, consultants, representatives, visitors, and guests from other home institutions. Fermilab's status as a world-class, scientific-research destination and its reputation as an institution of choice requires a community that promotes professionalism, mutual respect, inclusion, scientific integrity, and that is free from discrimination. Fermilab welcomes a diverse populace with varying backgrounds and experiences including international members.

To promote a community where all members commit to the same principles of ethics and behavior, even if having different home institutions and employment relationships, Fermilab developed its Statement of Community Standards. These standards apply to conduct by all community members and all interactions related to Fermilab, including but not limited to those on the Fermilab site (including the Village), at Fermilab installations or Fermilab-supported events that are off-site including Sanford Lab in South Dakota, CERN, and off-site conferences; online within the Fermilab domain; and when representing or associated with Fermilab off-site or online, including in-person interactions, virtual meetings, and on social media.

All members of the Fermilab community are expected to conduct themselves according to the basic principles of: (1) building trust and credibility; (2) communicating openly and honestly; and (3) respecting one another.

All members of the Fermilab community are responsible for reporting violations of the [Statement of Community Standards](#).

## Training and Reporting Concerns

### Ethics Awareness Training

FermiForward has developed education and communication programs to provide employees with information to raise their level of awareness and sensitivity to key issues. FermiForward requires all employees to participate in annual ethics awareness training as well as other compliance training as assigned. This training is a condition of continued employment by FermiForward.

### Reporting Concerns

FermiForward is committed to a culture of transparency where employees feel free to express concerns or to raise issues without hesitation or fear of retaliation. To promote this culture, FermiForward employees must report instances of improper conduct, unsafe conditions, conflicts of interest, violations of law or policy, or other irregularities. FermiForward encourages employees to use any of the following [avenues for reporting concerns](#).

- 1) Managers or Division/Department Leadership
- 2) HR Partners or WDRS Leadership  
[Administrative Grievance procedure](#)
- 3) The Office of General Counsel
- 4) The [Concerns Reporting System](#) is a third-party provided hotline/website reporting system that permits reporters to either self-identify or remain anonymous.

#### [Online Reporting](#)

Phone Hotline: 877.785.0008 (USA).

In addition, FermiForward employees may report directly to the Department of Energy (DOE) as follows:

- DOE Employee Concerns Program at the Chicago Consolidated Service Center – Hotline (800) 701-9966, or [scfieldecpc@science.doe.gov](mailto:scfieldecpc@science.doe.gov), or [employeeconcernsprogram@doe.gov](mailto:employeeconcernsprogram@doe.gov), or Fermi Site Office – Sean Wallace [sean.wallace@science.doe.gov](mailto:sean.wallace@science.doe.gov).
- DOE Fraud, Waste, and Abuse Hotline – (800) 541-1625 or [IGHotline@hq.doe.gov](mailto:IGHotline@hq.doe.gov)
- DOE Office of the Inspector General – (202) 586-4073, or [IGHotline@hq.doe.gov](mailto:IGHotline@hq.doe.gov), or <https://www.energy.gov/ig/complaint-form>

FermiForward employees who are managers must promptly report possible violations of law, regulation, or policy observed by them or raised by employees to the Office of General Counsel, an HR Partner, or the Employee Concerns Hotline or Website.

FermiForward will review all reported incidents or concerns to determine whether further analysis or actions are appropriate. FermiForward's process for conducting internal investigations is designed to identify whether a violation of law or policy has occurred, to determine what (if any) disciplinary or remedial action should be taken, and to determine whether any disclosures or further reporting is required. All information obtained during an investigation will be considered sensitive and only shared or disseminated on a need-to-know basis.

### Retaliation for Reporting Will Not Be Tolerated

Everyone at Fermilab is encouraged and responsible for expressing concerns without fear of retaliation. FermiForward does not tolerate retaliation for the good faith reporting of a concern regarding any suspected instances of improper conduct, violation of this Code, law, regulation, or policy, or for participating in an investigation. Employee reports are in good faith if the employee believes the information reported is honest and accurate, even if the information is later determined to be mistaken or incorrect.

FermiForward employees should report any instance of suspected retaliation to an HR Partner, the Office of General Counsel, or the Employee Concerns Hotline or Website. A report made by an employee also may be protected from retaliation under certain laws and regulations, such as a whistleblower law or DOE's Contractor Employee Protection Program.



Resources include:

[Policy on Equal Employment Opportunity Program: Non-Discrimination, Affirmative Action, Anti-Harassment, and Non-Retaliation in the Workplace](#)

[Whistleblower Rights and Protections Policy](#)

## Mandatory Disclosures

As a government contractor, FermiForward must disclose timely information to the appropriate government officials of credible evidence of certain violations of federal criminal law including fraud, conflict of interest, bribery, and gratuities found in Title 18 of the United States Code; violations of the civil False Claims Act; and significant overpayments on government contracts. To ensure FermiForward is complying with these obligations, all FermiForward employees must promptly report any concerns regarding such matters to the Office of General Counsel ([ogc@fnal.gov](mailto:ogc@fnal.gov)), so that FermiForward can determine whether there is credible evidence of wrongdoing that is reportable under the mandatory disclosure rules. This policy and procedure does not limit or prohibit any FermiForward employee from making a direct report to the Department of Energy Inspector General Hotline ([ighotline@hq.doe](mailto:ighotline@hq.doe)).

Resources include:

[Policy and Procedures on Mandatory Disclosures](#)

## Responsible Research Conduct and Scientific Integrity

Integrity, responsibility, and accountability are part of the fabric of science. Everyone engaged in research at Fermilab is responsible for adhering to the highest standards of research integrity, including scientific and ethical standards, and complying with all local, state, and federal regulations, and DOE requirements that address the protection of the environment, public, and personnel. This includes FermiForward employees as well as users or collaborators from other institutions performing research activities connected to Fermilab.

FermiForward has a responsibility to investigate allegations of research misconduct fairly, effectively, and expeditiously. FermiForward may be required to report investigation results to responsible funding agencies.

Resources include:

[Scientific Research Policy](#)

[Scientific Research Misconduct Procedure](#)

[Policies on Scientific Appointments](#)

## Communications and Endorsements

As manager and operator of a federally funded research and development center (FFRDC), FermiForward is not permitted to endorse or promote a private enterprise. FermiForward protects its and Fermilab's reputation and requirement of objectivity by not endorsing, certifying, providing testimonials, or approving other companies' products, services, or investments and not allowing others to use the name or logo of FermiForward, Fermilab, or



DOE or to solicit a statement from FermiForward to be used in any advertising, sales promotion, other promotional or financial efforts, or in any way that implies an endorsement, testimonial, certification, or approval by FermiForward, Fermilab, or DOE.

Any requests from a vendor, supplier, or other private enterprise for a statement or information to be used promotionally should be routed to the Offices of Communication, Procurement, and General Counsel.

Resources include:

[Communication Policy](#)

## Use and Protection of Property and Technical Data

### Rights to Intellectual Property

FermiForward's ability to apply the results of its own scientific research and to effectively meet its congressionally-mandated technology transfer mission depends upon appropriate intellectual property management. FermiForward employees have an obligation to report inventions developed during employment by FermiForward and to support FermiForward's efforts to protect such inventions. FermiForward employees must disclose inventions to the Office of Partnerships and Technology Transfer.

Resources include:

[Policy on Intellectual Property](#)

FermiForward employees must respect the intellectual property (IP) laws and the IP rights of others by complying with the conditions of non-disclosure and license agreements entered into by FermiForward and by using only authorized and properly licensed copies of software.

Resources include:

[Policy on Computing](#)

### Protecting Personal, Proprietary, Controlled, or Business Sensitive Information

FermiForward employees are responsible for protecting FermiForward's and Fermilab's proprietary, controlled, or sensitive information by marking information with appropriate restrictive legends and controlling the distribution of such information appropriately. Employees with access to information about other FermiForward employees or personally identifiable information (PII) of other individuals, must protect this information in accordance with FermiForward policy.

Resources include:

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

[Procedures for Protected PII \(Personally Identifiable Information\)](#)

[Policy on Controlled Unclassified Information \(CUI\)](#)

FermiForward employees with knowledge of third-party proprietary information should ensure that the third-party proprietary information is not brought into Fermilab or used by FermiForward without the third party's authorization. Procurement sensitive, business sensitive, and other sensitive information of FermiForward or a third party must be handled and protected appropriately to ensure compliance with regulations and procurement integrity.

Questions regarding the status or handling of third-party, personal, proprietary, controlled, or sensitive information should be directed to the Office of General Counsel or the Chief Information Security Officer (CISO).

## Export Control

U.S. law imposes restrictions on exports and other dealings with certain countries, entities, and individuals, including foreign nationals. FermiForward and all employees must comply with applicable U.S. export control laws and regulations, such as the Export Administration Regulations (EAR), the International Traffic in Arms Regulations (ITAR), and DOE Orders and Regulations related to emerging technologies. FermiForward employees must appropriately limit distribution of or access to technology, documents, and information that is export controlled under the EAR, ITAR, or by DOE and must appropriately mark documents and materials that may be controlled. Providing controlled information to foreign persons, even on U.S. soil, is considered a deemed export that could violate U.S. export control laws and regulations.

The Export/Import Control Compliance Manager in the Office of General Counsel should be consulted for any export control questions on technology or information, including whether items might qualify for the fundamental research exemption.

Resources include:

[Export Control Policy](#)

[Technical Publications Website](#)

[Policy on Technical Publications](#)

## Stewardship of Property

FermiForward has stewardship and accountability responsibilities for FermiForward and government property. Every FermiForward employee is expected to use such property with proper care and for authorized purposes only.

Resources include:

[Personal Property Management Systems Policy and Procedure Manual](#)

[Government Property Policy](#)

Use of FermiForward or government resources may be monitored at the direction of FermiForward management at any time as required by security requirements. FermiForward employees should not have an expectation of unlimited privacy when using any such resources, including Fermilab systems used for email, network, internet, and telephone communications. Incidental personal use of FermiForward issued/government owned equipment such as computers and telephone equipment is permitted. Any permitted personal

use must be done on personal time. In addition, FermiForward employees should use collaborator or sponsor-owned property only in furtherance of the collaborator's or sponsor's project and never for personal purposes or for the benefit of other parties.

Resources include:

[Policy on Computing](#) (Computing Division policy)

[Policy on Computer Use](#) (HR policy)

## Cyber Security

The protection of Fermilab's computing and network resources, and the information that resides therein, is critically important. FermiForward employees are responsible for understanding the rules that apply to use of Fermilab's computing and network resources and for complying with those rules, including cyber security rules.

Resources include:

Computer Security Awareness [training and resources](#)

[Policy on Computing](#)

## Avoiding Conflicts of Interest

FermiForward is bound by a variety of conflict-of-interest policies, some of which emanate from the U.S. Department of Energy (DOE) contractual requirements (DOE Contract No. 89243024CSC000002) and some of which are founded in other policies, laws, and regulations. These policies pertain to a broad range of employee activities, including compensated outside business and professional activities, procurement, hiring procedures, sponsored research, licensing, and technology transfer.

Resources include:

[Conflict of Interest Policy](#)

[Policy on Outside Employment](#)

[Policy on Foreign Government Sponsored or Affiliated Activities](#)

[Anti-Kickback Policy](#)

[Gifts & Gratuities Policy](#)

[Policy on Acceptance of Honoraria and Stipends](#)

[Policy on Anti-Nepotism](#)

[Policy on Mandatory Disclosures to the United States Government](#)

## Personal Conflicts of Interest

FermiForward employees should avoid any influence, interest, personal activity, or relationship that creates an actual or apparent conflict with the best interests of FermiForward and Fermilab; or that could interfere with the employee's ability to perform his or her job duties. In situations where an actual or potential personal conflict of interest cannot be prevented, FermiForward may develop and agree to a plan to manage or mitigate the conflict of interest.

The Office of General Counsel advises employees and management on conflict of interest issues, analysis, and development and management of mitigation plans and requirements. An employee's supervisor and line management also may be consulted and have responsibilities relating to development and management of conflict mitigation plans.

Resources include:

[Conflict of Interest Policy](#)

The following standards apply to personal conflict of interest issues:

- FermiForward employees must disclose financial interests (including the interests of immediate family and household members) or relationships that might give rise to an actual or potential conflict of interest upon employment, on an annual basis thereafter, and through updates as relevant circumstances change.

The FermiForward Financial Disclosure Form is completed through the FermiWorks system and is launched by the Human Resources Department. The Office of General Counsel reviews the disclosures and advises on the conflict of interest analysis and mitigations. This [linked document](#) includes information on the FermiForward Financial Disclosure requirements and the questions that are asked through the FermiWorks system.

- FermiForward employees may have compensated or uncompensated employment or associations with another organization or business if there is not a conflict of interest between the outside association and FermiForward interests. To determine whether a conflict of interest exists, all FermiForward employees must disclose upon employment, on an annual basis thereafter, and through updates as relevant circumstances change:
  - All outside employment;
  - Outside associations where the employee holds a position of trust;
  - An outside position that overlaps with or relates to the Fermilab mission; and
  - Affiliations with a foreign government sponsored program or activity.

The Office of General Counsel must approve of the outside employment or association from a conflict of interest standpoint.

The Fermilab Outside Employment and Associations Disclosure form is completed through the FermiWorks system and is launched by the Human Resources Department. The Office of General Counsel reviews the disclosures and advises on the conflict of interest analysis and mitigations. This [linked document](#) includes

information on the Outside Employment and Associations disclosure requirements and the questions that are asked through the FermiWorks system.

- FermiForward employees are prohibited from using FermiForward issued or government owned property or resources, or their position for personal gain or to compete with FermiForward.
- FermiForward employees are prohibited from engaging in an outside activity that, because of level of effort, interferes with their ability to carry out their FermiForward work responsibilities fully and impartially.
- FermiForward employees who volunteer for organizations that have a relationship with FermiForward (such as Fermilab Natural Areas or Fermilab Friends for Science Education) must disclose leadership positions with the other organizations and must not use their FermiForward/Fermilab employee credentials for the other organization's activities.
- FermiForward employees are prohibited from participating in Foreign Government Sponsored Talent Recruitment Programs from countries of risk and are restricted from participating in other foreign government sponsored activities.
- FermiForward employees must avoid nepotism, which ordinarily involves making employment or other business decisions based on a family or romantic or social relationship.
- With limited exceptions, an FermiForward Employee shall not solicit or accept any gift, gratuity, or special favor from people or organizations that might affect or appear to affect the FermiForward employee's judgment in discharging their duties. Similarly, employees may not directly or indirectly give, offer, or promise anything of value to people or organizations doing business with or seeking to do business with FermiForward.
- Offering, soliciting, or accepting a kickback (money, fee, commission, credit, gift, gratuity, thing of value, or compensation) of any kind during the course of a subcontract competition, award, or performance is a conflict of interest and violates federal and state law as well as FermiForward policy.

Questions regarding personal conflicts of interest should be directed to the Office of General Counsel. Employees and management are encouraged to consult with the Office of General Counsel at any time regarding conflict of interest questions, including through direct contact sent to [ogc@fnal.gov](mailto:ogc@fnal.gov) apart from the FermiWorks disclosure process.

## Organizational Conflicts of Interest

Appropriately managing Organizational Conflict of Interest (OCI) requirements is central to FermiForward operation and management of Fermilab.

### (a) FermiForward OCIs

FermiForward, as operator of Fermilab and a Federally Funded Research and Development Center (FFRDC), must conduct its activities in a manner that is in the public interest, with objectivity and independence, and that avoids conflicts of interest on the part of FermiForward as an institution. This is required by Clauses I.118 and I.160 of FermiForward's

prime contract with DOE and is intended to ensure that FermiForward: (1) is not biased because of its financial, contractual, organizational, or other interests related to the work performed under the prime contract; and (2) does not obtain any unfair competitive advantage over other parties by virtue of its performance of that work.

Organizational conflict of interest considerations for FermiForward also include: (1) restrictions on the use of prior work product; and (2) restrictions on access and use of information, subject to the prime contract requirements and FermiForward's rights to use technical data it first produces under the prime contract for its private purposes consistent with the patent, rights in data, and security provisions of the prime contract. FermiForward submits all requests for waivers of organizational conflict of interest to the DOE contracting officer in writing.

Potential OCIs for FermiForward should be avoided and mitigated. The Office of General Counsel advises FermiForward on OCI issues. Questions regarding FermiForward organizational conflicts of interest should be directed to the Office of General Counsel.

(b) Subcontractor, User or Affiliate OCIs

FermiForward must avoid or mitigate the potential of organizational conflicts of interest for subcontractors, users and affiliates, and other partners.

Federal Acquisition Regulation (FAR) Section 9.5 contemplates three situations in which organizational conflicts of interest for subcontractors may arise:

- A “bias” situation in which a contractor or subcontractor, as part of its performance of a contract or subcontract, has helped set the ground rules for another government contract. This often arises when a contractor or subcontractor has the opportunity to draft specifications or a statement of work for a procurement, thus creating the possibility that it could skew the competition in its favor.
- An “impaired objectivity” situation in which a contractor or subcontractor has some relationship or interest, such as a share of the proceeds on the sale of a product or an equity or ownership interest, or where the contractor or subcontractor may be called upon to review its own work or the work of a closely related entity. If the contractor or subcontractor is providing recommendations that could affect its other business interests, then the company’s “objectivity” may be impaired.
- An “unequal access to information” situation in which the contractor or subcontractor may gain a competitive edge because of its access to information that is not available to other competitors.

Potential OCIs for subcontractors, users, and affiliates should be carefully reviewed and avoided. OCI issues are analyzed through Procurement and Office of Partnerships and Technology Transfer policies and procedures. The Office of General Counsel advises Procurement and the Office of Partnerships and Technology Transfer on OCI analysis and mitigations for subcontractors, users, and affiliates. Questions regarding OCI requirements and issues should be directed to the Office of General Counsel, Procurement, or the Office of Partnerships and Technology Transfer.

## Hiring or Doing Business with Former Government Employees

FermiForward hiring or doing business with former government employees is subject to conflict of interest laws and regulations for both FermiForward and the government

employee. This includes discussions to explore potential post-government employment relationships.

Once hired or retained by FermiForward, the former government employee may be prohibited from performing certain tasks and duties that relate to their prior responsibilities as a government employee, sometimes for a specified period of time.

FermiForward employees must consult with the Office of General Counsel to ensure compliance with federal regulations and FermiForward policy.

Resources include:

[Policy on Hiring or Doing Business with Former Government Employees](#)

## Laws and Policies of General Applicability

### Equal Employment Opportunity

FermiForward provides employment and opportunities for advancement, compensation, training, and growth according to individual merit, without regard to race, color, religion, sex, national origin, sexual orientation, gender identity, marital status, veteran status, age, genetic information, or disability. FermiForward complies with all United States immigration laws and regulations and contractual requirements, including those relating to work visas and hiring foreign nationals.

Resources include:

[Policy on Equal Employment Opportunity Program: Non-Discrimination, Affirmative Action, Anti-Harassment, and Non-Retaliation in the Workplace](#)

[Policy on Sponsorship of Employees for U.S. Immigration Benefits](#)

[Policy on Access to Fermilab](#)

### Discrimination and Harassment are Strictly Prohibited

FermiForward is committed to providing a work environment that is free of discrimination and harassment based on race, color, religion, gender (including sexual harassment), national origin, age, disability, sexual orientation, or gender identity. Discrimination and harassment based on these classifications is strictly prohibited. FermiForward has an affirmative duty to maintain a work environment free of discrimination and harassment to ensure that all employees are treated with respect and dignity. Retaliation for good faith reporting will not be tolerated.

Resources include:

[Policy on Equal Employment Opportunity Program: Non-Discrimination, Affirmative Action, Anti-Harassment, and Non-Retaliation in the Workplace](#)

### Human Trafficking

The United States Government has a policy prohibiting human trafficking activities, which is incorporated into FermiForward's prime contract. FermiForward has a zero-tolerance policy



regarding human trafficking. Neither FermiForward employees nor Fermilab users and affiliates, visitors, subcontractor employees, or FermiForward agents shall be involved in the following activities: trafficking in persons, soliciting or obtaining prostitution or any commercial sex act, or using debt bondage, slave, forced, child labor, fraudulent recruitment practices, or concealing any such activities. FermiForward employees must report possible violations of this policy by any employees or any consultant, contractor, subcontractor, vendor, or supplier to the Office of General Counsel, to the Fermilab Concerns Reporting System, or to the National Human Trafficking Hotline (1-888-373-7888, text 233733 or <https://humantraffickinghotline.org>).

Resources include:

[Policy Against Human Trafficking](#)

## Safe Workplace

Safety is core to the Fermilab operations. All FermiForward employees are responsible for working safely, protecting the safety and health of others, promptly reporting at-risk behaviors or conditions, and stopping work when observing imminent danger. FermiForward employees should notify management or the appropriate representative designated to oversee matters of employee safety of any issues or concerns regarding health, safety practices, and environmental issues. Managers are responsible for providing an environment where work can be performed safely and where environmental, safety, and health concerns can be readily brought forward without fear of retaliation.

Resources include:

[Safety and Health Policy](#)

[Environmental Policy](#)

FermiForward does not tolerate any type of workplace violence. Workplace violence includes all actions or threats, by employees or non-employees, that are violent in nature. FermiForward employees should try to protect one another from the dangers of any illegal activity in or near the workplace by immediately reporting suspicious activity to the Fermilab Security Department. It is prohibited to bring firearms and other dangerous weapons or materials to the Fermilab site.

Resources include:

[Policy on Violence in the Workplace](#)

## Drug-Free Workplace

FermiForward maintains a workplace free of drug or other substance abuse. FermiForward employees are prohibited from illegally manufacturing, distributing, dispensing, possessing, using, or being under the influence of any illegal drug or controlled substance while on the Fermilab site or conducting FermiForward business. The consumption of alcohol on site or during work hours is prohibited unless FermiForward management explicitly authorizes it.

Fermilab is a federal site, and while marijuana has been legalized in Illinois, it remains a controlled substance under federal law. Marijuana is therefore prohibited on Fermilab property. This prohibition applies to all areas of the Fermilab site, including the public areas and the Village.

FermiForward employees performing specified safety-sensitive functions are subject to drug and alcohol testing as a condition of continuing employment.

Resources include:

[Policy on Drug and Alcohol Abuse](#)

## Time Recording

FermiForward employees must accurately record the time worked with the proper project, task, or activity indicated. By approving the timecard, FermiForward employees are certifying that the time is being charged in accordance with FermiForward's time charging policies and procedures. Managers are responsible for reviewing and approving the time charges made by their reporting employees.

Resources include:

[Time and Labor System Policy](#)

## Travel and Other Expenses/Costs

FermiForward employees must properly document travel and charge applicable expenses, purchases, facilities charges, and equipment usage rates to the correct account or cost objective for which they were incurred. FermiForward only reimburses employees for authorized, reasonable, and actual expenses incurred, in accordance with the Federal Travel Regulations (FTR) meal per diem and lodging rate while conducting business on behalf of FermiForward. FermiForward employees are responsible for ensuring that travel, hotel, meal, business development, and other business expenses are consistent with FermiForward policies on reimbursement. False, inflated, or misidentified costs (such as charges for alcohol reported as other types of allowable cost) submitted for reimbursement violate FermiForward policy. Questions regarding the appropriateness of a business expense should be directed to your manager or the Finance Department.

Resources include:

[Travel Policy](#)

## Records Management

FermiForward and its employees are responsible for creating and maintaining accurate, complete, and reliable business records. Sponsors and regulatory authorities require that FermiForward records (paper or electronic) be maintained and retained in accordance with applicable laws and regulations. FermiForward Records Retention Schedules define how long to retain particular records. FermiForward employees must not remove, destroy, mutilate, damage, or dispose of, in whole or in part, any FermiForward records unless the records have met the retention requirements listed in the Records Retention Schedule. Questions regarding records management should be directed to the Records Management Office.

Resources include:

[Records Management Policy](#)

[Policy on Information, Categorization, Access, and Document Control](#)

In addition, from time-to-time, FermiForward may be required for legal purposes to retain records and documents (paper or electronic) outside of a normal retention schedule or requirement. FermiForward employees must comply with any document hold instructions issued by the Office of General Counsel.

## Delegations of Authority

Only FermiForward employees with written delegations of signature authority may make financial commitments or sign documents that bind FermiForward. Employees without such authority must take care to not give the impression to third parties that they have such authority by making oral or written commitments, signing documents, or giving technical directions which purport to bind FermiForward to a procurement or affect FermiForward's legal rights. Employees are responsible for determining and understanding the limits of their authority before taking such actions.

Resources include:

[Procurement Policy, Procedures and Processes](#)

## Bribes, Kickbacks, Gifts, and Gratuities

FermiForward employees are prohibited from offering, giving, soliciting, or accepting a bribe or kickback. Likewise, FermiForward employees may not solicit any gift or gratuity (i.e., anything of value) from a person or organization that does business with or seeks to do business with FermiForward, with limited exceptions for items of nominal value. FermiForward employees are prohibited from giving gifts or offering anything of value to federal or state government employees, with limited exceptions defined in the guidance below. FermiForward employees should report any concerns or violations to the Office of General Counsel or through the Fermilab Concerns Reporting System.

Resources include:

[Anti-Kickback Policy](#)

[Gifts & Gratuities Policy](#)

Questions regarding potential bribes, kickbacks, or gifts and gratuities should be directed to the Office of General Counsel.

## False Claims

Knowing submission of a false or fraudulent claim to the government, or supporting a claim with a false record, along with other specific acts, can trigger liability under the civil or criminal component of the False Claims Act. It is imperative that all claims, invoices and certifications provided to the government are accurate and well-supported. FermiForward has mandatory reporting requirements if it identifies credible evidence of a violation of the False Claims Act. Questions regarding whether

a claim might raise a False Claims Act concern should be directed to the Office of General Counsel.

Resources include:

[False Claims Act](#) (31 U.S.C. §§ 3729)

[Policy on Mandatory Disclosures](#)

## Lobbying

Lobbying activity covers a broad range of formal and informal contacts and communications at the Federal, state, and local government level. FermiForward is subject to prohibitions on using appropriated and prime contract funds to conduct any lobbying activities, and FermiForward and its subcontractors are prohibited from charging the government for the costs of influencing or attempting to influence any elected or government official in connection with contract, grant, or cooperative agreement actions.

The restrictions on lobbying activities can be found at [Clause H.30](#) (Consolidated Appropriations Act of 2015) of FermiForward's Prime Contract with the Department of Energy.

## Interactions with Government Officials

FermiForward employees may have routine interactions with federal agencies unrelated to a specific solicitation or funding opportunity. When it is not related to a specific solicitation, it is permissible for FermiForward employees to have discussions regarding the qualities, characteristics, and capabilities of FermiForward, or the terms and conditions of sale, and technical discussions and other activities regarding FermiForward. If conducted prior to a formal solicitation, it is acceptable for FermiForward employees to provide unsolicited information necessary for an agency to make an informed decision about the initiation of a contract action and to have technical discussions regarding the preparation of an unsolicited proposal prior to submission. When engaging in such discussions, FermiForward employees must take all requisite precautions to protect FermiForward's intellectual property rights under federal law.

Resources include:

[Policy on Interactions with Government Officials](#)

Questions about lobbying or other interaction with government officials should be directed to the Office of General Counsel.

## Political Activity

As a federally funded research and development center, FermiForward and the Fermilab site must remain neutral on political activities. Thus, political activity and campaigning is prohibited on the Fermilab site. FermiForward employees may not use FermiForward/Fermilab resources or property (including phones and computers) while participating in political activities or supporting any political candidate's campaign for election to any Federal, state, local, or foreign public office. No FermiForward or government funds can be used to make contributions to any

candidate for public office, nor may FermiForward reimburse any employee for personal campaign contributions. While FermiForward employees are encouraged to personally participate in the political process as a matter of good citizenship, they must do so away from the Fermilab site, without using Fermilab facilities or FermiForward resources, and on their own time. FermiForward employees are prohibited from using their Fermilab affiliation as a credential or presenting themselves as an FermiForward or Fermilab representative while engaging in political activities. FermiForward employees are prohibited from using Fermilab computing systems or email accounts for political activities. If an FermiForward employee receives political communications to their Fermilab email account, the employee may forward the message to their own private email account, but they must then delete the email from their Fermilab email account and must not forward the email to anyone else.

Resources include:

[Policy on Interactions with Government Officials](#)

[Policy on Communications](#)

## Contacts

**Office of General Counsel**

**630-840-3572**

**[OGC@fnal.gov](mailto:OGC@fnal.gov)**

**<https://generalcounsel.fnal.gov>**