

Wylfa Newydd Project

8.17 Workforce Management Strategy

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Executive Summary

1. At the peak of construction of the Wylfa Newydd Development Consent Order (“DCO”) Project (“the Project”) two out of every nine employees will be local to Anglesey. Many of the workers will come from outside Anglesey. This strategy describes the commitments made by Horizon to mitigate adverse effects that may occur during construction. For example, Horizon will run employment initiatives to increase the number of workers recruited locally.
2. The strategy includes details of how any potential adverse effects will be managed and mitigated through:
 - Horizon’s commitments;
 - The contractual obligations which Horizon will impose upon its supply chain and
 - The terms of employment for the workforce and the Code of Conduct which all of the workforce will be asked to sign.
3. In addition, this strategy describes the monitoring and enforcement action which will be used to ensure that the strategy successfully manages and mitigates any adverse effects of the workforce.

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1 Introduction

1.1.1 Horizon Nuclear Power Wylfa Limited (“Horizon”) estimates that at the peak of the construction phase, it will need around 8,500 workers to build the Project. However, this strategy (consistent with the Environmental Impact Assessment) is based on 9,000 construction workers at peak. The proposals to house these workers now comprise:

- provision of up to 4,000 bed spaces on the Site Campus (a purpose built Temporary Workers’ Accommodation within the Wylfa Newydd Development Area);
- a central case that relies on use of 3,000 bed spaces in existing accommodation across Anglesey and parts of the mainland; and
- recruitment of 2,000 workers who are existing local residents who will not therefore need temporary accommodation.

1.1.2 Therefore, of the 9,000 workers predicted for assessment purposes, approximately 7,000 construction workers may be non-home based. Although Horizon will seek to maximise the number of workers recruited locally through employment initiatives, many will not already live in and around Anglesey and will have to come from outside the community.

1.1.3 Horizon is committed to mitigating and managing the potential effects of a large proportion of non-home-based workers on the Anglesey communities through robust and sensitive planning and management of its construction workforce and their behaviours during the construction period. This strategy sets out how Horizon will achieve this, ensuring that any adverse effects are minimised as far as reasonably possible.

1.1.4 The commitments in this strategy will be supported by various components of the DCO and its control documents including:

- Supply Chain Charter;
- Jobs and Skills Strategy;
- Workforce Accommodation Strategy;
- Code of Conduct (as described in this strategy);
- Wylfa Newydd Code of Construction Practice (COPC) and Sub-COPCs;
- Wylfa Newydd DCO Project Specific Supplementary Document;
- DCO s.106 Agreement]; and
- Community Safety Management Strategy (CSMS).

1.2 Purpose and Scope

1.2.1 The primary purpose of this document is to set out:

1. Horizon’s commitments to ensure appropriate management of the workforce,

2. supply chain contractual obligations and
3. Workforce behaviour principles which will govern workforce behaviour and which will be secured through their terms of employment and the Code of Conduct.

1.2.2 To achieve its purpose, the scope of this strategy includes provision of information in respect of how Horizon will monitor and enforce adherence to the requirements in the strategy and on the content and application of the Code of Conduct.

1.2.3 The purpose of this document is not to provide details of how processes associated with workforce management will be implemented. Such processes will be delivered by the supply chain in liaison with Horizon and IACC at a later date and prior to commencement of the Project.

1.2.4 Nor is the purpose of this document to provide details of Horizon's strategy in relation to safeguarding. The reader is asked to refer to the CSMS for details on safeguarding. This is secured by the CoCP at section 3.4.

2 Principles

2.1.1 This section sets out Horizon's commitments under this strategy, details of some of the contractual obligations which Horizon will impose upon the supply chain and an explanation of the workforce behaviour principles and Code of Conduct.

2.2 Horizon's Commitments

2.2.1 Under this strategy, Horizon is committing to:

1. Imposing contractual obligations upon its supply chain to require them to adhere to the principles set out in section 2.3 below and, where applicable, to ensure that Horizon adheres to those principles as well
2. Ensuring that the Code of Conduct is publicly available so that the community are aware of the expected standards of behaviour and providing suitable channels for the community to engage with Horizon over workforce conduct.
3. Monitoring adherence to the principles through information which the supply chain will be required to provide and through any feedback from the local community
4. Reacting appropriately to deal with any workforce-related problems which become apparent through its monitoring
5. Ensuring that proactive links are established between the Project (Security, Help-line, Community Involvement Officers and Welsh Language and Culture Co-ordinator) and the emergency services on the island (Police, Fire Services, Emergency Air Services, Ambulance Service) to ensure effective communications and incident response
6. Establishing roles for Community Involvement Officers and a Community Liaison Group to support proactive communication with the community.
7. Taking reasonable steps (such as those described in this paragraph) to safeguard the welfare of its employees and those acting on behalf of Horizon and where it is appropriate, to safeguard the welfare of the general public. Prior to and throughout construction of the Wylfa Newydd Power Station appropriate dialogue will be maintained between Horizon, the supply chain and local safeguarding agencies, including North Wales Police. Discussions will include any individual or coordinated measures appropriate to avoiding risks to vulnerable groups, for example in relation to human trafficking and direct or indirect sex work. Safeguarding protocols will be prepared by Horizon in consultation with North Wales Police, and IACC, and reviewed at least annually. Horizon will ensure that an appropriate number of Horizon and supply chain staff will be trained in safeguarding issues so that, for example, security staff who conduct site and/or vehicle inspections will be aware of signs of illegal activity such as human trafficking.

8. Seeking to minimise workforce access to Wylfa Head through site design. This will include restricting use of gate on the site campus boundary to emergency use only so that pedestrian access from the site campus is only possible via the main access road in non-emergency situations. Furthermore, the design will include amenity building and welfare facilities that encourage on-site recreation.
9. Ensuring there is a range of social, leisure and sporting facilities on the Site Campus in order to occupy workers during their free time including a multi-use games area, gym, and a number of other facilities.
10. During the tern breeding season, ensuring wardens are present on Horizon's land and that relevant restrictions are in place.

2.3 Supply Chain Contractual Obligations

2.3.1 Through appropriate contractual obligations, Horizon will require its supply chain to adhere to the following principles:

1. Management and monitoring of breaches in health, safety and environment standards as well as breaches of the Code of Conduct. The supply chain will be required to establish regular reporting processes to Horizon and mechanisms for Horizon to have oversight on key issues and targets (for example, establishment of Engagement Groups and the WAMS Oversight Board).
2. Require workers, as part of their induction, to sign a copy of the Code of Conduct (acknowledging they have read and understood it) and ensure and confirm all personnel are familiar with the Code of Conduct and expected behaviours prior to commencing work on site.
3. Ensuring that the Code of Conduct is effectively communicated to the community so that there is awareness of expected standards of behaviours.
4. Supply chain supervisors will make personnel aware of any shortcomings in their conduct and wherever possible seek to address them as soon as possible.
5. Ensure effective disciplinary procedures are in place to reinforce the behaviours expected of personnel, and ensure all incidents are investigated as soon as possible and enforce disciplinary procedures against any employee in breach of workforce behaviour principles. This may require liaising and assisting with police services in their investigation of criminal matters such as drug and alcohol offences.
6. The workforce is to be treated fairly through appropriate industrial relations agreements and processes.
7. Working hours and conditions will accord with relevant health, safety and environment standards and legislation.

8. In line with ONR regulations, appropriate security checks will be carried out on all personnel who have unescorted access to the Nuclear Licensed site, Sensitive Nuclear Information, Nuclear Material or Other Radioactive Material such as BPSS, or National Security Vetting (i.e. Security Check or Counter-Terrorist Check).
9. Ensure strong regard is given to the needs and concerns of the community and respond in a timely manner to any concerns or reasonable requests for information made by members of the community regarding works being undertaken and conduct of personnel. Horizon's supply chain will establish a process for promptly dealing with any complaints raised through the complaints register under the Wylfa Newydd Code of Construction Practice and reporting how issues have been resolved to Horizon.
10. The supply chain will ensure that all construction personnel are registered for the Workforce Accommodation Management Service. The supply chain should discourage staff from sourcing accommodation outside of the Workforce Accommodation Management Service.
11. The supply chain will seek to maximise local employment, through involvement in apprentice and trainee programmes, engagement of local suppliers, and recruitment in accordance with relevant Key Performance Indicators (KPIs) set out in planning agreements. The supply chain will regularly report to Horizon on achievement of identified KPIs.
12. Encourage all personnel to use temporary health and welfare facilities on site and within the Site Campus in order to deal with the majority of worker health and welfare requirements and incidents and this will include access to doctors and nurses.
13. The supply chain will ensure all personnel are adequately trained and capable to carry out their roles. Training programmes (including inductions and 'tool box talks') will be developed in consultation with Horizon and will include information on:
 - community relations and expectations of the workforce in the local communities;
 - Welsh language and culture (both awareness and language skills (training level to correspond to job requirements) and Horizon's Welsh Language Policy;
 - health and safety, including occupational health and hygiene;
 - key environmental issues (including statutory protections for the environment, the importance of not disturbing terns during the breeding season (for example) and respecting advice from site wardens); and
 - job specific-requirements and obligations (for example, controls around the use of HGV operation).
14. The supply chain will maintain appropriate dialogue with Horizon and local safeguarding agencies, including North Wales Police. The supply chain will also participate as required in any individual or coordinated measures appropriate to avoiding risks to vulnerable groups, for example in relation to human trafficking and direct or indirect sex work. As and when required to do

so by Horizon, the supply chain will ensure that personnel will be trained in safeguarding issues so that, for example, security staff who conduct site and/or vehicle inspections will be aware of signs of illegal activity such as human trafficking.

15. The supply chain will adhere to (and ensure their personnel are aware of and comply with) all corporate business policies as advised by Horizon, including but not limited to, policies relating to Welsh Language, Modern Slavery, Supply Chain (Environmental and Corporate Sustainability) and Human Resources.
16. The supply chain will work collaboratively with Horizon and other suppliers to ensure that everyone involved in the Project understands the need to respect local communities when working on the Project and are focused on helping to mitigate potential effects on local communities.
17. The supply chain will implement the Traffic and Transport Strategy, as set out in the Wylfa Newydd Code of Construction Practice (Application Reference Number 8.6 to 8.12), to manage workforce and construction movement to reduce effects on local road network.
18. Information packs containing the Traffic and Transport Strategy will be provided to all construction workers at their induction. The information packs will contain but not be limited to the following:
 - HGV routes and route restrictions (if appropriate);
 - Safety and operational requirements;
 - construction vehicle routes (if appropriate);
 - non-compliance guidance;
 - complaints procedure;
 - bus routes.
19. The supply chain will comply with any requirements advised by Horizon in respect of recruitment processes including requirements to advertise job profiles through Welsh and local brokerage services, include language requirements within job profiles, and appoint a Welsh speaking staff member to all interviews for roles which require Welsh language skills.
20. The supply chain will facilitate data collection of workforce demographics, subject to privacy laws, to assist in ensuring education, health and housing demand is managed appropriately.
21. The supply chain will reinforce the key messages and behaviours set out in the Code of Conduct in ongoing workforce engagement and communications activities.

2.4 Workforce behaviour

- 2.4.1 Workforce behaviour will largely be governed through the terms of employment under which the workforce is engaged to work on the Project. These will be based upon appropriate industry standard agreements:
 - National Agreement for the Engineering and Construction Industry (NAECI 2015) and

- Construction Industry Joint Council (CIJC) Working Rule Agreement modified as necessary by a Horizon Wylfa Newydd DCO Project Specific Supplementary Agreement (which will deal with any DCO requirements) and will include disciplinary procedures consistent with ACAS Code of Practice "Disciplinary and Grievance Procedures" (April 2009).

2.4.2 Alongside this, the workforce will be required to sign the Code of Conduct, a draft of which is appended at Appendix 1. Horizon will work with its supply chain and with trade unions to develop and agree the final content of the Code of Conduct.

2.4.3 The Code of Conduct will apply to all personnel (both home-based and non-home based) for the duration of their employment on the Project, including both their time spent on-site and off-site. (In the context of the Code of Conduct, off-site is intended to mean when workers are off duty, living and/or spending time in the community.)

2.4.4 Below are set out some of the principles by which the workforce will be governed within their terms of employment and the Code of Conduct:

1. All personnel will receive a copy of and be required to behave in accordance with the Code of Conduct at all times, regardless of whether they are on-site or off-site.
2. All personnel will be required to attend and complete all necessary induction and training programmes prior to the commencement of work.
3. All personnel must respect the Welsh language and culture and be encouraged to demonstrate basic linguistic courtesy through developing these skills during their induction and use within the community.
4. All personnel must comply with job-specific obligations and requirements (i.e. abiding by constructional and operational controls identified in securing documents) as well as any construction-related plans or strategies.
5. Personnel must adhere to construction vehicle routes (if appropriate), and this includes construction workers sticking to 'A' class roads, and subsequently avoiding 'B' class roads, 'C' class roads, and unclassified roads, wherever practicable (to avoid causing unnecessary nuisance and disturbance to local communities).
6. All personnel must be courteous to members of the public and respect and support the needs of the communities in which they work.
7. All personnel must use the transportation services and facilities provided as part of the Project (i.e. the Park and Ride Facility, shuttle bus services, and car sharing initiatives) to travel to the Wylfa Newydd Development Area. Alternative travel arrangements (i.e. individual cars) must be pre-approved by the individual's employer and will only be allowed in limited circumstances.
8. All personnel will also comply with any vehicle registration procedures. All personnel using the Park and Ride Facility will be required to register their cars and contact details with Horizon. Any personnel found to be

parking outside designated areas (or 'fly parking') will be disciplined.

9. All personnel must register with the Workforce Accommodation Management Service. All non-home-based personnel should seek to use the Workforce Accommodation Management Service to identify and secure accommodation in the first instance, before using other accommodation services. All personnel should provide information on selected accommodation choices when requested for data collection purposes.
10. All personnel (not just those residing on the Site Campus) should seek to use the temporary health and welfare facilities on the Site Campus in the first instance, before seeking to use community services. Horizon will require construction workers to register with, and, prioritise the use of the on-site medical and healthcare services rather than using the community NHS services.
11. All personnel to comply with policies regarding drug and alcohol use including:
 - The making, selling and use of any unlawful drugs is strictly prohibited and will result in immediate dismissal.
 - Personnel should not attend work or carry out work duties under the influence of drugs or alcohol, nor use or possess drugs or alcohol at the workplace. If choosing to drink outside of working hours, personnel will drink responsibly and avoid consumption of alcohol that impacts on their ability to perform their role and/or safety on the construction site or brings the Project into disrepute.
 - All personnel will make themselves available for random drug and alcohol testing and related searches during work hours.
12. All personnel must comply with all health, safety, security and emergency processes and procedures while on-site and challenge (where appropriate) and address and report any non-compliances and breaches immediately.
13. All personnel must observe and comply with applicable law, regulations and professional standards at all times and ensure no damage of any kind is caused to property within the community.
14. All personnel must work in a safe and responsible manner with due respect for their safety and safety of others at all times.
15. All personnel will be required to act as ambassadors for the Project through their behaviour and actions (including their use of social media) when in the community and at all times.
16. All personnel must treat others with respect and refrain from anti-social, criminal, violent or discriminatory behaviour or sexual harassment and understand that these behaviours will not be tolerated at any time.
17. Worker accommodation (Site Campus, private, tourist or otherwise) must be treated with respect and maintained in a clean and tidy state, including proper waste disposal.

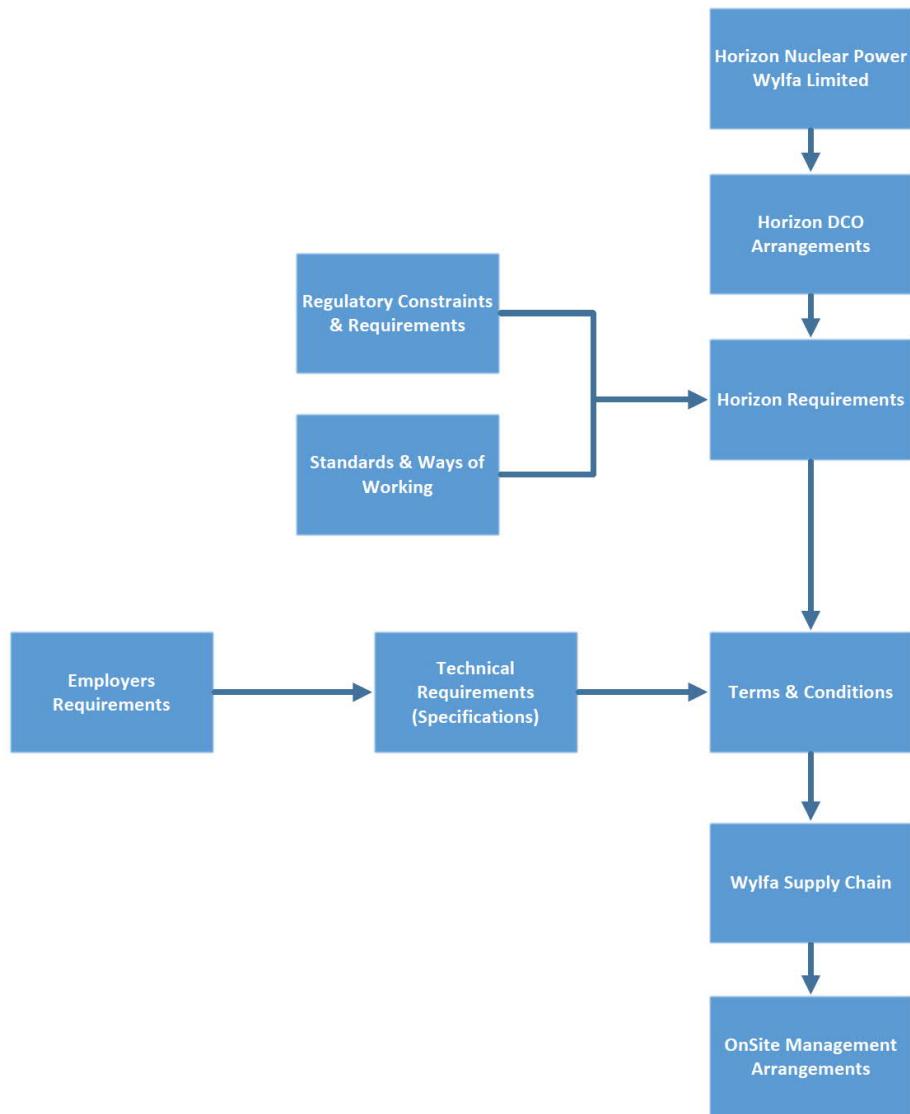
18. All personnel residing at the Site Campus must abide by all site protocols and procedures relating to security, parking, housekeeping (for, example, curfews, noise restrictions and emergency procedures), and dispute resolution.
19. All personnel must be aware of nearby sensitive ecological receptors and their legal protection, which requires compliance with the Conservation of Habitats and Species Regulations 2017 and Wildlife and Countryside Act 1981 (that is, the Wylfa Head, Tre'r Gof and Cemlyn SSSIs, the Cemlyn Bay (lagoon) SAC and other local nature reserves). Personnel must seek to avoid damage or interference of any kind to these areas by, for example:
 - keeping to defined paths and behind barrier fencing at all times;
 - refraining from littering;
 - refraining from removing or damaging vegetation, habitats, nests and eggs; and
 - not impacting (damaging, picking, collecting or harming) any species within these areas (particularly nesting species).
20. All personnel must ensure that personal noise levels are appropriate at all times and all locations.
21. All personnel will comply with the Traffic and Transport Strategy as set out in the Wylfa Newydd Code of Construction Practice (Application Reference Numbers 8.6 to 8.12, including speed limits, the highway-code, identified route restrictions and be respectful of other road users including agricultural vehicles, pedestrians, cyclists and livestock.

3 Monitoring and Enforcement

3.1 Contractual Flow down of Principles

- 3.1.1 In order to deliver the Project, Horizon will use a large supply chain. A small number of entities will contract directly with Horizon, whilst the overwhelming majority will be appointed through a series of sub-contracts. Each direct Horizon contract will include obligations upon the supply chain to comply with the principles described at section 2.2 above. In addition, each member of the supply chain will be required to flow down such requirements to sub-contractors at all levels in the supply chain. Among these requirements will be the requirement for all workers to sign the Code of Conduct.
- 3.1.2 In addition to using the industry standard agreements to form the basis of these contracts, Horizon will enter into a Wylfa Newydd DCO Project Specific Supplementary Agreement (WNPSSA) and Sector Specific Agreement with its supply chain. This will include details in relation to labour relationships, industrial relations, and employment framework (including employment terms and conditions) applicable to all workers to be engaged on the Project, together with the governance arrangements for ensuring that these provisions are effectively applied.
- 3.1.3 Sector specific agreements will sit below the overarching WNPSSA. These sector specific agreements cover workers in the Civil Engineering, Building, Engineering, Construction and Supervisory roles, and generally set out more detailed industrial and employment relations arrangements that may be relevant to each trade sector. Horizon will aim to harmonise sector agreements, as far as is reasonably practicable, however in the event of any ambiguity the requirements of the WNPSSA will take precedence.
- 3.1.4 Figure 3-1 below demonstrates the contractual flow of WMS principles.

Figure 3-1 Contractual Flow Down of WMS Principles



3.2 Monitoring

3.2.1 Regular monitoring, where applicable in accordance with industry standards, will be implemented through comparison of performance against agreed indicators (KPI's), enabling shortfalls to be investigated, any findings to be shared with the supply chain and stakeholders and agreement to be reached upon further improvements/mitigations. This will be reported through the relevant Engagement Group.

3.3 Disciplinary action

3.3.1 Horizon will require its supply chain to implement within its terms of employment disciplinary procedures which are consistent with the ACAS Code of Practice “Disciplinary and Grievance Procedures” (April 2009) and more generally in accordance with NAECI Chapter 15 – Managing Discipline; or CIJC WR.22 – Grievance Procedure and WR.23 – Disciplinary Procedure (all of which may be modified by changes specified in the WNPSSA).

3.3.2 In broad terms, disciplinary procedures will include the following key elements:

- Notification of any breach or shortcomings to the individual in question;
- Where sufficiently serious, a disciplinary meeting to take place between the individual in question (accompanied by a trade union official or work colleague if desired) and his or her employer;
- If appropriate, suspension of the individual on full pay during investigation of the misconduct;
- Detailed, thorough and impartial investigations by the employer in question;
- Individual to receive formal allegation in writing together with evidence received;
- An appropriate outcome (which could include a recorded verbal warning, a final written wording, dismissal with notice or other sanctions and
- Dismissal or transfer to another project or disciplinary suspension without pay.
- Horizon will, where appropriate, exclude individuals from access to the site and may, where appropriate, request that the individual be removed from the Project and may seek to terminate its contract with the supply chain member in question.

Appendix 1 – Wylfa Newydd Workforce Code of Conduct

This Code of Conduct sets out the standards and expectations relating specifically to workforce behaviours to be adhered to on the Project. All workers engaged on the Wylfa Newydd DCO Project will be expected to sign this document during the induction onboarding process to acknowledge that they fully understand and accept:

- (i) the general and project specific behavioural requirements, standards and expectations as detailed in the Code of Conduct, and
- (ii) understand the consequences of a deliberate breach of these standards and expectations.

Breach of the Code of Conduct requirements will be dealt with in a manner aligned to misconduct as defined in industry standard agreements (specifically NAEI section 15.7 and CIJC section 23.5). Any alleged breach of the Code of Conduct will be investigated under formal disciplinary procedures consistent with the ACAS Code of Practice "Disciplinary and Grievance Procedures" (April 2009), as modified in the Horizon WNSSPA (Project Specific Supplementary Agreement).

As a worker on the Wylfa Newydd Construction Project when working within the designated site you will be expected to:

- be responsible for your own safety and the safety of others
- observe all relevant instructions communicated to you with respect to health, safety, environment, ecology and quality and engage with Horizon nuclear "behavioural culture" relating to the Wylfa Newydd Construction Project including the wider project requirements.
- understand and observe individual contracts of employment in all respects including any terms and conditions set out in the Site Specific Supplementary Agreement and supporting relevant sector collective agreements such as NAEI and CIJC and any written statement of employment particulars
- observe Horizon and Supply Chain site rules, policies and procedures at all times
- observe working hours (including allocated meal breaks); arrive at the workplace in a timely manner and be ready to commence work at the allocated time and remain at the workplace until the designated finish time. Any foreseeable absence from work should be agreed with supervisor in advance of the absence.
- not to report for work whilst under the influence of drugs or alcohol, nor to introduce, possess or use illegal drugs or alcohol at the workplace.

You will also be required to comply with the following additional "Off Site" behavioural requirements (including those accommodated in the TWA facility) as incorporated in to the Project Specific Supplementary Agreement requirements including

- act as ambassadors for the Wylfa Newydd DCO Project through their individual behaviour and actions when in the community, including the use of social media
- refrain from anti-social behaviour, discriminatory behaviour or harassment
- ensure that their private rented accommodation, or TWA accommodation, including common areas, where appropriate, are maintained in a tidy state and that facilities for the proper disposal of rubbish are used at all times
- ensure that personal noise and light levels are maintained at an appropriate level commensurate with the time of day and location

- ensure that no damage of any kind is caused to property within the community
- refrain from possession or use of unlawful drugs
- refrain from antisocial behaviour arising or resulting from the consumption of excess alcohol
- respect advice on welsh culture including the use of basic local language vocabulary when greeting stakeholders and meeting people in the local community
- respect speed limits, comply with Horizon recommended safe travel to work routes (avoid unclassified and B roads) and other restrictions that Horizon may be committed to impose from time to time to ensure the safety of both local communities and the wider workforce.
- respect restrictions placed on Horizon through the DCO commitments including access conditions to sensitive ecological areas noting that these may be covered by legislation where a breach could result in prosecution of the employer or yourself. (Horizon will commit to ensure such restrictions are fully communicated to workers at the Site Inductions and provide regular reminders/updates through daily "Tool Box" talks).

Failure to comply with the above expectations shall be dealt with through disciplinary procedures that accord to the provisions in the National Agreements (NAECI – 15 – Managing Discipline) and CIJC Working Rule Agreement WR 23. – Managing Discipline). The following lists examples of unacceptable behaviours what may be considered as misconduct or in severe cases gross misconduct. (Details of the NAECI or CIJC relevant procedures that will be enforced through employment contracts can be downloaded from the NAECI or CIJC websites)

Examples of actions that may be deemed as misconduct or gross misconduct that will result in disciplinary procedures include (but are not limited to):

- Wilful or reckless non-compliance with safety legislation, including (site licence requirements) and company/site specific safety rules, failing to report significant events, or any conduct likely or resulting in damage to property, injury to persons or neglect of personal safety.
- Being under the influence of alcohol or other stimulants or drugs whilst at work
- Physical violence – actual or threatening
- Violent, disorderly or indecent conduct
- Deliberate damage to property
- Theft, fraud or falsification of company records, documents or time sheets
- Serious breach of confidence (subject to Public Interest Disclosure)
- Act of incitement to or actual acts of discrimination on grounds of sex, race, belief, colour, ethnic origin, disability, age or sexual orientation
- Serious insubordination
- Bullying or harassment
- Bringing Horizon or its supply chain into disrepute
- Deliberate release of sensitive or confidential information

Declaration by employee (worker)

I understand and agree to comply with the above Code of Conduct expectations and standards, as covered in the Wylfa Site Induction process. I understand that any misconduct may be subject to disciplinary procedures as outlined and potential dismissal.

Name: _____

Signature _____

Date _____

Employer _____