



Great British
ENERGY | NUCLEAR

Our Code of Ethical Conduct

April 2026

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Opening Message from Our Chief Executive

At Great British Energy – Nuclear, we are building an organisation with a clear and nationally important mission: to deliver clean, secure energy, and economic growth for the UK. The way in which we achieve this is as important as delivery itself.

Our Code of Ethical Conduct sets out the standards we expect of ourselves and each other as we move into this next phase. As we grow and take on increasingly complex delivery, it is essential that we are aligned, clear on how we act, how we make decisions, and how we work together across teams, partners and communities.

We are committed to operating with integrity, fairness and accountability in everything we do. That means doing the right thing, even when it is not the easiest option. It means creating an environment where people feel able to speak up, raise concerns and challenge constructively; and it means treating one another with respect, recognising that strong performance depends on trust, collaboration and shared responsibility.

This Code is a practical guide to how we work. It sets out our legal and ethical responsibilities, and the behaviours that underpin a high-performing organisation. Each of us has a role to play in upholding these standards and applying them in our daily work.

I ask that you take the time to familiarise yourself with the Code and what it means in practice. If something does not feel right, speak up. If you are unsure, ask. Maintaining a strong, open and accountable culture is essential to delivering our mission successfully.

Together, we are building an organisation that delivers with integrity, earns trust, and makes a lasting contribution to the UK's future.



Simon Roddy

Chief Executive Officer, Great British Energy - Nuclear

A handwritten signature in black ink that reads "Simon". The signature is written in a cursive style with a long horizontal stroke underneath.

Section One

Introduction to Our Code of Ethical Conduct

Our Code of Ethical Conduct aims to provide a clear and comprehensive framework that aligns with our core values. This Code is designed to be user-friendly, with practical guidance and examples that will help every member of our organisation uphold the highest ethical standards in their daily activities.

Our Code of Ethical Conduct serves to guide our employees' actions, build trust within and outside the company, and nurture relationships in line with our Company values. This Code helps our people make the right decisions and comply with the rules wherever we operate within the UK.

At GBE-N we want to build a culture where everyone feels welcome and safe to be themselves at work. This is not only part of our duty of care to everyone who works here – we also believe it's crucial to our growth and our performance.

Our Code of Ethical Conduct applies to every one of us here at GBE-N, from the Chair of the Board to our apprentices, whether employed directly or through an agency or secondment.

At GBE-N we take our responsibilities very seriously

We recognise the impact our behaviours have on the workplace, and we lead by example, supporting each other by acting as positive, trusted role models and encouraging colleagues to share ideas, ask questions and listen when someone raises a concern.

We aim to be open and transparent in our decision-making and consistent in our actions, regardless of the level of seniority.





Our values



Trust

We prioritise **safety**, we act **responsibly** and with **integrity**.



Care

We are **thoughtful, inclusive** and **respectful** of others.



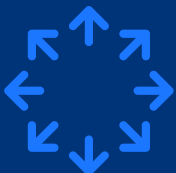
Challenge

We are **curious** and **courageous** in the way we **think** and **act**.



Collaborate

We work as a **team**, we value **diversity** and **expertise**.



Drive

We **get things done** and we **make a difference**.

TRUSTED: Our decision-making model

Our Code is not designed to be a complete set of rules which cover every situation. Instead, the principles should act as a guide in determining the right approach together with good judgment and common sense and with reference to our policies and procedures.

If you encounter an ethical dilemma, it can be helpful to use our **TRUSTED** decision-making model as a framework to help you think about what to do.



Take a moment

Take a moment: Think about our Values and how they relate to the issue



Read

Read the relevant policy, procedure and guidance



Understand

Understand the options and the implications for others



Speak

Speak to others: Your manager; a subject matter expert like HR or HSE; Ethics or Legal



Take action

Take action: Keep a record of what you did and how you decided what to do



Evaluate

Evaluate: How did it go? What went well? Even better if...? Establish root cause



Develop

Develop and improve: How can you make it better for others in the future or prevent recurrence?

Speaking Up

What to do if you have a question or concern

We are committed to creating a culture where colleagues feel safe to ask questions or raise a concern, knowing that they will be supported and listened to and there will be no repercussions for anyone that raises a concern in good faith, even if they turn out to be wrong.

GBE-N does not tolerate acts of retaliation against anyone for raising a genuine concern or participating in an investigation.

We have several speak up channels available to our colleagues. Wherever possible, we encourage you to have a conversation directly with the person whose conduct is concerning you or with your line manager. Alternatively, you might prefer speaking to the relevant subject matter expert (i.e. Health and Safety, HR or Data Privacy) or the Head of Ethics. You should know that any member of the Executive Team, including our CEO will also make themselves available to you.

We also have an external speak up channel operated by Safecall, an independent company. Using this

channel, you can raise concerns confidentially, and anonymously if you wish, at any time – either by phone or web-portal.

Details can be found by following this link safecall.co.uk/report

Please don't suffer in silence or think no-one will care. We want to hear from you so we can make sure GBE-N is a brilliant place to work.

If you believe there has been, or may be, a breach of our Code of Conduct, or if you suspect any behaviour that could be illegal or unethical, we strongly encourage you to speak up and report it to us at the earliest opportunity.

Our ability to investigate and address potential breaches relies on being informed about them promptly.

You do not need to have absolute certainty or all the details. It is sufficient to have reasonable grounds to suspect that wrongdoing has occurred or may occur.

We understand that raising concerns requires courage, and we want to assure you that all reports will be handled with sensitivity and the utmost confidentiality.

Your willingness to act is essential in upholding our standards and values.

“The standard you walk past is the standard you accept”

Lieutenant General David Morrison

Section Two

People: Making a positive impact



Health and Wellbeing, Safety and Security

The safety of our colleagues, and anyone that works on or visits any of our sites is our number one priority. We own our own personal safety and look out for others. Nothing is more important than ensuring our people return home from work to their loved ones safe and well each day, so we set and expect the highest standards for protecting our own and others' health and safety.

We prioritise safety in all aspects of our work from completing Safety training, following procedures to challenging each other to work in the safest way.

We never put ourselves or others at risk from our actions. We stop work and seek advice if we think it might be unsafe. We always work safely and comply with health and safety rules and regulations.

We constructively challenge unsafe behaviours and report all security, accident, injury or safety incidents and near misses and take appropriate action to investigate, determine root cause and put measures in place to prevent recurrence.

We think it is important for our people to feel at their best, both physically and mentally, so we provide access to wellbeing support and resources.

Safety and Security work coherently, following Security processes and procedures and keeping vigilant and reporting any concerns as soon as possible supports our overarching Safety priority.



Question

One of our sub-contractors uses old, worn-out PPE, I mentioned this even though they don't work for GBE-N but they were rude and said we do not pay them enough to use new PPE. Have I done my bit now I've brought it up?

Answer

Even though they aren't our employee, they should be upholding our standards whilst working with us. This should be raised with the contract manager or the HSE team.



Valuing our differences

Embracing diversity, equity and inclusion is critical to our success. We value the unique contribution each person brings to GBE-N and this ensures that we benefit from a wide variety of ideas, perspectives and talents from our team. We all thrive in a diverse workplace where all employees belong, feel safe psychologically and physically, feel respected, valued and listened to and are treated in an equitable way.

We do not tolerate any discrimination within our workplaces or in hiring, development and career progression.

We actively manage this by setting ourselves challenging targets via our D&I strategy.

Question

My team occasionally goes out for after work drinks to celebrate success. I'd love to join in but I have childcare commitments that mean I need to go straight home, so I feel excluded and not part of the team. Am I just being silly?

Answer

No, this is probably not intentional but does highlight that inclusivity needs to be considered properly so everyone can join in. Speak to your line manager and explain how you feel.

Respecting each other

Everyone at GBE-N is treated with the utmost respect. We do not tolerate any physical, verbal or non-verbal forms of abuse or harassment, either in the workplace or online. This includes any unwanted behaviour that could reasonably be considered offensive, intimidating or humiliating, as well as any form of sexual harassment. Exclusionary behaviour may also be considered harassment or bullying.

We care about each other and challenge any inappropriate behaviour. GBE-N has robust policies in place for dealing with such matters, and concerns of this nature will be taken very seriously and dealt with in line with the relevant policy or procedure.

Human rights and modern slavery

We conduct our business in a way that respects the human rights of our colleagues and those we work with.

At GBE-N we take our responsibilities very seriously and we do not tolerate modern slavery, child labour or human trafficking and we demand the same commitment from those we work with.



Question

One of the people in my team makes suggestive comments that are not aimed at me, but I find offensive. I have told them how I feel but they told me it is just banter and to stop being the fun-police. I love my job but don't want to work with this person any more.

Answer

This is unacceptable and directly in opposition to our values, and also opens GBE-N up to risk under the Worker Protection Act. Well done for trying to address it with the individual but as they aren't receptive, you need to speak to your line manager or HR.

Section Three

Conducting Our Business with Integrity

Doing what is right





Impartiality and conflicts of interests

We avoid situations in which our professionalism, independence or impartiality may be compromised or could be perceived as being compromised and including where conflicts of interest could be seen as influencing our decisions or actions.

We disclose any actual, perceived or potential conflicts of interest, including financial, personal or family connections to partners, suppliers and colleagues and follow any controls or mitigations requested by GBE-N to manage risk.

We are open and transparent about any engagement or interaction with Government and never make any political donations.

Question

I work in the procurement team and have just started dating someone in the bid team at a vendor we are working with. It's early days so I don't want to make a big deal of this and we're not in a "relationship" so I don't need to declare this do I?

Answer

Yes, by declaring this, you are not only protecting GBE-N but also yourself. This will enable GBE-N to put the relevant controls in place to ensure neither GBE-N nor you are put in a difficult situation or accused of any impropriety. It's always better to over-declare than under-declare!

Question

I was at a conference recently and saw people from two of our potential vendors having lunch together in the hotel. I thought that looked a bit odd as they are both competing for the same package of work.

Answer

This may be innocent, or it could suggest collusion, which is anti-competitive behaviour. You should raise this with the person leading the bid.

Laws, regulations, sanctions and export controls

We comply with all applicable national and international laws and regulations including those related to sanctions and export controls. We ensure that compliance with all relevant laws and regulations are embedded in everything we do. Where possible we endeavour to go beyond our regulatory requirements in the pursuit of achieving the highest ethical standards in our business, where our own requirements are more stringent, these will always take precedence.

We ensure that we intermittently review our policies, practices and agreements to ensure that they are compliant with the latest laws and regulations, updating them where necessary.

Our proactive approach to risk management also means that we strive to implement changes to our practices to comply with future legal and regulatory requirements before they have taken effect.

By adhering to all our legal and regulatory obligations, we aim to not only mitigate against any legal and reputational risks for GBE-N, but to contribute to the maintenance of global security and the highest ethical standards.





Anti-fraud, bribery and corruption

We do not tolerate or engage in any forms of fraud, bribery or corruption and we demand the same zero-tolerance commitment from those we work with.

Gifts and Hospitality

We believe that gifts and hospitality (G&H) are courtesies that are common business practices, and, in moderation, they are an important tool for building and maintaining relationships. However, we also understand that in excess, or if used inappropriately, giving or receiving G&H may give the appearance of improperly influencing our or others' business decisions or outcomes and could be regarded as a bribe, regardless of whether or not that was the intent.

At GBE-N we only offer or accept G&H when it is appropriate to do so in the circumstances in which it is provided, and with the appropriate approvals in place, ensuring we are living up to our values.

As any G&H offered by GBE-N comes from public funds, we challenge ourselves to ensure that it is modest and has a robust business justification.

All G&H must comply with and be recorded in line with the Gifts and Hospitality Procedure.

Fair business conduct and competition

We conduct our business fairly and transparently and in accordance with applicable competition laws, and applicable the Public Procurement Regulations.

All our workers, advisors and third-party organisations that we collaborate with are obligated to uphold the highest standards with regards to maintaining the integrity of confidential information, declaring potential conflicts of interest and adhering to all applicable laws, including competition law, and standards for business best practice more generally.

We regularly review and update our policies, practices and agreements to ensure that all our relationships are ones based on honesty, fairness and integrity.

Working with suppliers and business partners

We build and maintain strong relationships with suppliers and business partners.

Our suppliers and business partners are essential to our ability to do business and meet our stakeholders' expectations. As they are compensated with public funds we must choose them carefully, use an objective selection process and undertake appropriate due diligence to assess any legal, financial and ethical risks, and operate within the applicable Public Procurement Regulations framework.

compliance, so we communicate our relevant expectations clearly to suppliers and business partners, agreeing contractual obligations where appropriate.

We must inform our management of any indication that a supplier or business partner is not complying with applicable laws or their contractual obligations.

We want to work with organisations that share our commitment to safety, ethics and

We will never accept nor give any bribe and will report all suspicion of corrupt practices.

Accurate financial records

We use internal controls to maintain accurate and complete financial records of our business activities in line with applicable laws, technical and professional standards.

Question

A supplier has offered to provide my daughter with some unpaid work experience over the summer. She really wants to do this, and it is not paid so this will be ok won't it?

Answer

No, bribes can take many forms - anything of value could be perceived as a bribe. It could appear that you "owe" them something in return. Your daughter should apply for work experience through the formal channels.

Question

I have seen some news articles saying a supplier we have been working with has been implicated in corrupt business practices.

Answer

Please immediately notify our Legal Transparency and Ethics team in order that this can be looked into properly. In circumstances, companies can be held liable for the actions of their suppliers, so it is important we get to the bottom of this.

Question

We have submitted our accounts to our external auditors but I have since spotted an error. Shall I leave it and let the auditors raise this – their job is to spot this kind of thing isn't it? If they don't raise it, then it can't be material can it?

Answer

No, we need to be transparent and take accountability for our mistakes. Misreporting financial information is a serious issue. Mistakes happen, but it is how we deal with them that determines what kind of organisation we are.



Prevention of tax-evasion and money-laundering

We do not engage in or enable money laundering or tax evasion, nor do we facilitate the tax evasion of others. We must be on guard and alert to help protect our reputation from these risks and ensure we comply with the law.

Political Impartiality

We always:

- serve the government, whatever its political persuasion, to the best of our ability in a way which maintains political impartiality and is in line with the requirements of the Civil Service Code, no matter what our own political beliefs are;
- act in a way which deserves and retains the confidence of ministers, while at the same time ensuring that we will be able to establish the same relationship with those whom we may be required to serve in some future government;
- comply with any restrictions that have been laid down on our own political activities.

We never:

- act in a way that is determined by party political considerations, or use official resources for party political purposes
- allow our personal political views to determine any advice we give or our actions.

Quality

We are focused on right first-time delivery in everything we do, meeting national and international quality standards appropriate for the nuclear sector to ensure efficient and effective delivery. We will maintain an integrated management system which defines how we operate, and we will seek independent third-party certification to BS EN ISO 9001:2026 to provide validation and governance of our approach.

We will cascade our approach and values related to quality throughout our supply chain to ensure right first-time, efficient delivery for the UK.

We seek to be a learning organisation and to ensure that we use best practice and knowledge from our operations to continually improve the way we work.



Question

I think one of our contractors is inflating their working hours. What should I do?

Answer

If this is found to be true, as we are an arms-length body and responsible for managing public funds, this could constitute the contractor defrauding the government, which is a very serious matter. Please raise this with your line manager, together with any evidence of your concerns.

Question

I'm active in an organisation which protests against climate change. I am planning to attend a high-profile but peaceful rally in my own time. I have every right to do that don't I?

Answer

Whilst GBE-N does not wish to influence employees' political views or other beliefs, employees need to be mindful of the impact that engaging in related activities may have on our business and reputation. Consideration should also be given to the potential criminal ramifications of engaging in such protests despite the peaceful intent. You should seek advice from your line manager.

Section Four

Protecting our Information

Our responsibility, our future





Protecting confidential information

We protect the confidential information we hold, including data from customers, suppliers, joint ventures and other partners.

We only share and use it internally to the extent that we are permitted to, and we never share it externally without authorisation.

We keep everyone's confidential information secure, never misuse information we have access to or use information we should not have.

If we think we have made or witnessed a mistake relating to the use of confidential information we must notify our manager immediately, in order to minimise the impact and mitigate any risks.

We ensure that when contracting with workers, advisors and any other third organisation, maintaining confidential and sensitive information is never compromised.

We encourage all our workers to use our Confidential Information Policy and Guidance documents to facilitate them in achieving their obligations of maintaining the integrity of the confidential Information they encounter in fulfilling their roles at GBE-N.



Protecting personal data

We respect the privacy rights of individuals and are committed to protecting the personal data of our colleagues, partners and others with whom GBE-N conducts business in line with UK General Data Protection Regulations and Data Protection Act. For more information see our Data Protection Policy.

For information on the standards, you can expect from us when we collect, hold or use your personal information see our when we collect, hold or use your personal data please see our Employee, Seconded and Contractor Privacy Notice.

Question

I sent an email to an external recipient by mistake when it was intended for an internal colleague. However, I phoned them straight away and asked them to delete it. Do I need to do anything else?

Answer

It depends on the circumstances. Always check with the Legal team first so they can advise. Time is of the essence in these situations so there is more chance of the issue being contained.

Information and Cyber-security

GBE-N information and the systems on which it is stored are considered business critical assets due to their key role in supporting the business and the sensitive nature of the information held.

GBE-N will establish, maintain and support a positive security culture, and will ensure compliance with:

- All applicable legislation and regulation.
- Government and stakeholder expectations and requirements.
- UK Nuclear Cyber Security Strategy and derivatives.

We will only use our IT systems and equipment for their intended purpose of promoting effective communication and working practices within our business.

We will safeguard IT assets in our possession from loss, disclosure or misuse.

We will take appropriate measures to prevent access to our IT systems by complying with our information and cyber security requirements; and immediately report any loss of

We will be vigilant against cyber-attacks and scams such as phishing and immediately report any incidents, including potential or actual losses of GBE-N information or other assets or any suspicious activity involving our IT systems of which we become aware.





External communications and social media

It is important that our external communications are clear, accurate, consistent and responsible.

We only talk to the media or members of the investment community when specifically authorised to do so by the communications team. We always refer requests for opinions, information, invitations to speak or attend external events where stakeholders are present to the communications team before we do anything, and we make sure we have obtained approval before we agree to attend or share any information, opinions or materials.

We use social media responsibly and in accordance with our social media policy. This means that we are always positive, supportive and respectful when in any forum that can be seen by colleagues or those we do business with. We are mindful that irresponsible or inappropriate use of social media can harm our workplace, our business and our reputation. We never post about commercially sensitive announcements, competitions or other milestones without first checking with the communications team.

Question

I tend to leave my laptop in my car boot overnight so I don't forget to bring it into work with me. My car was broken into on my drive last night and my laptop (among other things) was stolen. What shall I do?

Answer

You should immediately report this to the IT security department so they can try to contain the issue. You should never leave your company devices unattended, so always bring your laptop inside rather than in your car.



Freedom of Information

GBE-N supports the objectives of the Freedom of Information Act 2000 (FoIA) and Environment Information Regulations 2004 (EIR) and other legislation and guidance relating to the provision of, and access to, information it holds.

Accordingly, we will make information available by publishing a wide a selection of information on the GBE-N internet site, and by providing information on where publications can be obtained and website links to information available online.

We will respond to any request for information made in writing within the required timescales set out in the applicable legislation unless there is an exemption under FOIA or a qualified

exemption together with a 'public interest' reason for not releasing certain information.

We must always refer requests for information to the Head of Ethics at foi@greatbritishnuclear.uk to ensure we comply with the legislation.

Question

Our team has just won an award at an industry event – I am very proud and want to post this on LinkedIn. Can I?

Answer

Well done! We do want to promote a positive profile but it is important that we do this properly and consistently, so please speak to the Communications team for advice on how best to do this.

Section Five

Spending Wisely

Trusted custodians of public funds



Travel and Expenses

All travel expenditure or claims for reimbursement of expenses are strictly in connection with business undertaken on behalf of GBE-N and in accordance with our Travel and Expenses Policy and Procedure.

We make all claims for reimbursement promptly and provide any supporting information required.

Use of GBE-N's resources

GBE-N's assets such as facilities, equipment and information are essential to our success. We take responsibility for using GBE-N's assets and resources carefully and conscientiously.

This means we look after any equipment that we are permitted to take home or travel with, as if it were our own, and report any losses or damages immediately. We only use equipment for GBE-N business purposes unless we've been given permission for another use, and never for personal gain such as secondary employment.





Responsible Procurement

All procurement activities carried out for or on behalf of GBE-N comply with legislation and observe the principles of public procurement: equal treatment; non-discrimination, proportionality and transparency and support the delivery of GBE-N's strategic objectives and priorities. We promote best procurement practices whilst ensuring value for money.

In addition, we consider how social value, innovation, our commitment to net zero and reducing greenhouse gas emissions are driven and optimised throughout the procurement lifecycle and ensure a fair, open and transparent process.

Question

I need to travel and be away for several days for GBE-N and it means I will miss my partner's birthday. Is it ok to bring them with me?

Answer

This might be ok, but you will be responsible for meeting any incremental costs relating to transport, accommodation and subsistence. It's a good idea to run this past your line manager first, as transparency is very important and helps to manage the views of others.

Question

My son wants to use my GBE-N laptop to write up a school project – is this ok?

Answer

Unfortunately not - your laptop will contain or have access to sensitive information, and there is a risk the information could be unintentionally seen, amended, deleted or shared.

FAQs

This section provides key contact information for guidance on ethical matters and answers to some frequently asked questions about the Code of Conduct.

If you need assistance or clarification, please refer to the contacts listed or consult the FAQs.

Your Manager or HR

If you are an employee, your first point of contact should be your line manager or your local Human Resources team. They will either work to resolve the matter directly or escalate it to the appropriate person or team for further investigation.

Email Us

If you wish to raise a concern confidentially, you can use our dedicated mailbox, which is managed by the Legal Transparency and Ethics Team. Please send your details to: ethics@greatbritishnuclear.uk

Alternatively, feel free to contact any member of the Legal Transparency and Ethics Team or any Executive team member.

Independent Hotline – SafeCall

If raising a concern internally doesn't feel appropriate, we provide access to an independent, confidential hotline operated by SafeCall. You can reach **SafeCall** through their secure web portal at safecall.co.uk/report using a computer or mobile device, or by calling them directly at 0800 915 1571

Your privacy and confidentiality will be respected throughout the process.

Q Are there circumstances where the independent hotline (SafeCall) should not be used?

A Yes, the hotline is specifically for reporting serious issues, such as breaches of the Code of Conduct, which you do not feel comfortable addressing internally. For routine Human Resources matters or workplace grievances, the appropriate channel would be the Grievance Procedure.

Q Will my identity remain confidential if I raise a concern?

A You have the option to report a concern anonymously. If you choose to provide your identity, we will treat it with strict confidentiality unless disclosure is required by law (for instance, in response to legal proceedings or law enforcement). However, it is often helpful to share your identity, as it allows us to address your concern more thoroughly by discussing the details with you directly.

Q What happens if I make a mistake?

A As long as your concerns are raised in good faith and not with malicious intent, you will never face any repercussions for speaking out, even if no evidence of wrongdoing is ultimately found.

Q What if I suspect that one of our partners or suppliers is involved in misconduct?

A The Speak Up Policy is available for reporting suspicions involving third parties, such as suppliers or service providers working with our organisation.

Final word from our Chair

Thank you all for taking the time to read through our Code of Ethical Conduct. At GBE-N we have an important mission to deliver in challenging timescales. Even though we are working to strict milestones in order to deliver our programme on time I want to reiterate what I have previously said - we will not compromise rigour for pace. We must follow the rules and procedures we have in place and speak up if we think this is not the case. We simply cannot risk compromising our Values or our integrity being challenged. As we enable the Government to navigate the nuclear energy industry and build a more sustainable future, we also have an obligation to demonstrate the highest ethical behaviours ourselves, earning trust and assuring our stakeholders that GBE-N is absolutely the organisation of choice to make this happen.

Thank you for being part of this journey with Great British Energy – Nuclear.



Simon Bowen

Chair of the GBE-N Board of Directors

A handwritten signature in black ink that reads "Simon Bowen". The signature is written in a cursive, flowing style.



Great British
ENERGY | NUCLEAR

in @great-british-nuclear
▶ GreatBritishEnergy-Nuclear
✕ GBNgovuk

**Great British
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