



## **POLITICAL ACTIVITIES AND LOBBYING POLICY** **(Amended Effective July 31, 2024)**

BWX Technologies, Inc. (the “Company”) believes strongly in the democratic political process and that its directors, officers, employees and agents should take an active interest in fostering principles of good government in the states and communities in which they live. Further, the Company is a responsible corporate citizen and, where permitted by applicable laws, may participate in public policy discussions on matters relating to its business and engage in lawful political activities and lobbying. The Company is committed to compliance with the letter and spirit of applicable laws regarding such activities, and compliance with applicable disclosure requirements pertaining to political contributions and lobbying expenditures.

Applicable laws and regulations governing corporate political contributions, lobbying, political activities and the providing of gifts, entertainment or meals to government officials are complex, and include severe criminal and civil sanctions for violations. Employees are responsible for understanding and complying with this policy and are strongly encouraged to seek additional guidance from BWXT Government Relations, the Legal Department, or from the Ethics and Compliance Department prior to contacting any Government Official and/or giving anything of value to a Government Official.

### **I. General Policy**

A. BWXT Government Relations is responsible for oversight and management of government contacts, political activities and lobbying activities on the Company’s behalf. BWXT Government Relations must be notified of any visit to Company facilities or Company-sponsored events by federal or state government officials in advance of any such visits. BWXT Government Relations must also be notified of contacts with or visits by local government officials when the subject of contact focuses upon federal or state issues.

B. Except as specifically authorized by BWXT Government Relations in advance, employees may not use Company resources or equipment, materials, or facilities for political activities or lobbying activities or engage in political activities or lobbying activities on Company time. Employees may never use government-owned equipment, materials, facilities, or resources (including employee personnel time for which the government is compensating the Company) for political activities or lobbying activities.



C. Employees may spend as much time as they like--outside of the workplace and on their own time--engaged in political activities. Employees should not create the perception that their personal political activities, viewpoint or preferences are that of the Company's. Except as authorized in writing by the General Counsel, employees may not use the Company's name for political purposes, reference their employment status or title within the Company in connection with political activities or comment publicly on political issues when such action could be attributed to, or associated with, the Company.

D. In accordance with applicable laws, the Company on occasions may request that employees, as constituents, voluntarily contact government officials regarding issues important to the Company.

## **II. Political Lobbying**

A. Unless authorized by BWXT Government Relations, employees may not engage in or attempt to engage in (i) lobbying activities subject to the Lobbying Disclosure Act or (ii) any action that may be subject to similar state or local lobbying laws, on behalf of the Company. BWXT Government Relations is responsible for managing the Company's lobbying activities and develops and communicates additional guidelines to assure compliance with applicable national, state and local laws.

B. BWXT Government Relations develops procedures governing and is responsible for Company compliance with the Lobbying Disclosure Act (LDA). Such procedures include guidance for determining whether employees are or could be deemed to be "lobbyists" under the Lobbying Disclosure Act, and how employees are to account for their "lobbying contacts" and "lobbying activities" on behalf of the Company. All employees engaged in lobbying activities are required to report their time and expenses. In addition, certain employees are required to complete a certification verifying the information on each quarterly lobbying report. This report is circulated from BWXT Government Relations.

C. Unless approved in advance by the Senior Vice President and Chief Corporate Affairs Officer, and the Senior Vice President and General Counsel, employees may not retain third parties, such as consultants, organizations or any other form of entity, to engage in any activity with government officials, which could be subject to the Lobbying Disclosure Act or other applicable state or local lobbying laws.

D. Employees who initiate approval of company memberships in organizations that engage in (i) lobbying activities subject to the Lobbying Disclosure Act; or (ii) actions that may be subject to similar state or local lobbying laws must advise the Senior Vice President and Chief Corporate Affairs Officer of their intention. BWXT Government Relations coordinates any Company participation in such lobbying activities.



### **III. Contacts with Government Officials**

A. Employees should consult with BWXT Government Relations, the Legal Department or the Ethics and Compliance Department prior to making government contacts on behalf of the Company, (i) for purposes other than routine business matters or (ii) in response to any government inquiry of a non-routine nature.

1. BWXT Government Relations manages all of the following engagements for the Company:

- Any interaction with Members of Congress and any employee of either the House or Senate including personal staff, leadership organizations, caucuses, and committee staff;
- Any interaction with federal agency Schedule C political appointees; and
- All interaction with the Executive Office of the President.
- Federal employee engagements with officials in Senior Executive Service (SES) level I through V positions, (not to be confused with other Schedule 4 SES federal employees), as well as with general and flag officers (O-7 and above), may be reportable for lobbying disclosure purposes. While engagement with these officials is not managed exclusively by Government Relations, such interactions should be briefly summarized and reported to Government Relations within 48 business hours of occurrence to ensure filing compliance and to facilitate company-wide collaboration.

2. For coordination purposes, Government Relations must be notified at least 48 hours ahead of any staff interaction at any level within the Pentagon to review meeting purpose and ensure consistent messaging.

3. The sole exception to this Section III guidance is interaction with Naval Reactors, which is managed by the President of the Nuclear Operations Group.

### **IV. Political Contributions**

A. The Company is legally prohibited from contributing directly or indirectly (except in narrowly proscribed instances) in support of political candidates for elective federal office in the United States and is similarly prohibited from making such contributions in certain states.

B. Even if legally permitted to do so, the Company will not make political contributions to state or local candidates or in connection with state or local elections.



C. The BWXT PAC, which is funded by voluntary individual contributions and not by Company contributions, makes political and campaign contributions in accordance with federal laws. Even if legally permitted to do so, the BWXT PAC will not make political contributions to state or local candidates or in connection with state or local elections.

D. Employees may spend their own time and funds supporting political candidates and issues, but they will not be reimbursed by the Company for any such time or funds expended.

E. When authorized by the Company and permitted by applicable law, Company funds and facilities may be used to provide the needed administrative support for the operation of the BWXT PAC.

**V. Gifts and Entertainment – Government Officials and Government Employees**

A. Government officials and government employees at the federal, state and local levels are subject to various laws and regulations that prohibit or restrict the acceptance of gifts or entertainment. Employees may not provide gifts, entertainment (including meals), or anything of value to any Government Official or government employees without advance approval pursuant to company policy.

**VI. Section 527 Groups**

A. The Company shall not make any corporate contributions to groups organized under Section 527 of the Internal Revenue Code.