



Amentum's Code of Conduct for our Business Partners

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Amentum is a premier global technical and engineering services partner to the US Government and its allies, supporting critical programs of national significance across the defense, security, intelligence, energy, and environmental services markets.

Every day at Amentum we are changing the world for the better, solving our customers' complex challenges by leveraging our experience and innovative solutions. We draw from a century-old heritage of operational excellence, mission focus, and successful execution underpinned by a strong culture of safety and ethics. As demonstrated by the Amentum Star of Values below, we expect our valued business partners (subcontractors, vendors, consultants and suppliers) to hold themselves to the same high standards to ensure that we can continue to conduct business together in the future.



Inspiring Integrity is Central to ALL We Do

The Amentum Code of Conduct demands that we act with integrity in all that we do. We have a commitment to doing the right thing, always.

Working with Our Customers and Business Partners

Honest and Fair Dealings – We operate with a focus on complete honesty and accuracy in everything we say, write, and do. We treat each customer and client fairly and honestly and we honor our promises to our employees, customers, and business partners. We do not engage in any conduct that may constitute a real or perceived conflict of interest and expect the same from our business partners.

Working with the Government – We are committed to complying with legal, regulatory, and contractual requirements that apply to our government contracts. We adhere to the Federal Acquisition Regulation, Defense Federal Acquisition Regulation Supplement and Agency Supplements, public laws, contractual requirements, as well as our company policies and procedures that are tailored to the federal government and commercial contracting environment. We also expect the same compliance from all our business partners.

Working with Suppliers – We recognize that our business relationships with subcontractors, vendors, consultants and other third parties (suppliers) are critical to our success, so we partner with businesses that embrace our high ethical standards. We honor our contractual obligations and require that our business partners, in turn, honor theirs.

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Compliance with Laws

Our suppliers shall maintain full compliance with all laws and regulations applicable to their business. When conducting international business, or if their primary place of business is outside the United States, suppliers must comply with local laws and regulations, in addition to the applicable U.S. laws.

Protecting Property

Amentum and our suppliers are responsible for protecting assets from loss, damage, misuse, theft, and waste by using them accordingly and only for business purposes.

Information Protection

Confidential/Proprietary Information – We expect our suppliers to properly handle confidential or proprietary information, Personally Identifiable Information (PII), and any Federal Government Controlled Unclassified Information (CUI) that includes export-controlled information. Information should not be used for any purpose (e.g., advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

Intellectual Property – We expect our suppliers to respect and comply with all the laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

Information Security – Suppliers must protect the confidential and proprietary information of others, including PII, from unauthorized access, destruction, use, modification, and disclosure, through

appropriate physical and electronic security procedures. Suppliers must comply with all applicable data privacy laws. Suppliers shall assure extension of this requirement to all sub-tier sources they employ.

Cybersecurity – We expect our suppliers to safeguard and protect all information we provide from unauthorized access, destruction, use, modification, or disclosure. Risk-based cybersecurity programs must be utilized to mitigate threats appropriately to your information systems, products, services, and supply chain, and to comply with all regulatory requirements.

Maintain Accurate Records

We expect all our suppliers to create and maintain accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records must still be retained based on the applicable retention requirements. Suppliers performing as U.S. Government contractors (whether direct or indirect) must comply with the requirements in FAR 4.7 as well as the records requirements of the affected agency and the National Archives and Records Administration (NARA).

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Human Rights

We expect our suppliers to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

Child Labor – We expect our suppliers to ensure that illegal child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

Human Trafficking – Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and immediately address and promptly disclose to Amentum any adverse human rights impacts of their operations. Suppliers must educate employees on prohibited trafficking activities, discipline employees found to have violated the law or rules and notify the contracting officer of violations and action taken against employees. Specifically, suppliers will be prohibited from the following in all contracts.

- Destroying, concealing, or confiscating identity of immigration documents.
- Using misleading or fraudulent tactics in recruiting.
- Charging employee recruitment fees or providing inadequate housing based on local standards, laws, and directives.

- Failing to provide employment contracts and other documentation in the employee's native language.
- Failing to provide return transportation upon the end of employment for employees brought to the country for the purpose of working on a U.S. government contract or subcontract; and
- Failing to interview and protect employees suspected of being trafficking victims.

Employment Practices

Harassment – We expect our suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

Non-discrimination – We expect our suppliers to provide equal employment opportunity to employees and applicants for employment, without regard to any status protected by law, including race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

Substance Abuse – We expect our suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

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Anti-Corruption

Anti-Corruption Laws – Our suppliers must comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

We require our suppliers to refrain from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments are permitted where there is an imminent threat to health or safety.

We expect our suppliers to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultants.

Illegal Payments – Our suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies

even in locations where such activity may not violate local law.

Anti-Trust – Our suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors. Our suppliers must refrain from participating in a cartel.

Gifts/Business Courtesies

We expect our suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy occurs only if permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.

Fair Competition – We expect our suppliers to promote and engage in fair competition at all times and to never engage in or support unfair or unethical business practices.

Insider Trading – Our suppliers and their personnel must not use material or non-publicly disclosed information obtained in the course of their business relationship with us as the basis for securities trading or for enabling others to trade in the securities of any company.

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Conflict of Interest

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a real and/or perceived conflict of interest in their dealings with our company. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of our company or personal interests of close relatives, friends, or associates.

Environment, Health, and Safety

We always embrace our core value to “Live Safe” by leading Environmental Health and Safety (EHS) at all levels, empowering employees, managing operational risk, and advancing organizational learning with a goal to achieve zero incidents and injuries.

A Safe Workplace – We integrate EHS into our operations and relentlessly pursue safety excellence by identifying best practices, continually improving outcomes to optimize our operational performance. Amentum and our business partners shall comply with all applicable laws, regulations, and company policies and procedures related to EHS aspects of the work we perform and the facilities we control. When the possibility of an EHS violation exists or a situation poses the potential for physical harm or imminent danger affecting Amentum employees, its clients, subcontractors, general contractors,

or the public, business partners have the responsibility to stop work and report the situation to an Amentum supervisor or manager with no fear of retribution.

A Respectful Workplace – Amentum is committed to fostering a workplace where everyone is treated with dignity and respect. As part of our commitment to our global community, we maintain positive, productive work environments and uphold individual human rights. We comply with the employment laws of the location in which we conduct business.

Environmental Management - We expect our suppliers to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

We expect our suppliers to comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers shall protect the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

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International Trade Compliance

Security – When applicable, suppliers are encouraged to implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism initiative of the U.S. Department of Homeland Security and local country Authorized Economic Operator (AEO) programs.

Export and Import – We expect our suppliers to ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the export and import of parts, components, and technical data.

Anti-Boycott – Our suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the Export Control Reform Act of 2019 (ECRA) and the 1976 Tax Reform Act.

Conflict Minerals – Suppliers must adhere to federal laws and regulations requiring reporting companies to make specialized disclosure and conduct due diligence concerning their use of conflict minerals that may have originated in the Democratic Republic of the Congo (DRC) or an adjoining country. Conflict minerals include cassiterite, columbite-tantalite, gold and wolframite, or their derivatives (tantalum, tin, and tungsten). Under the Securities Exchange Act of 1934, reporting companies that manufacture or contract to manufacture products

that contain conflict minerals must conduct due diligence on the source and chain of custody of the applicable conflict minerals, and if required, file a report annually with the SEC by May 31st. We expect our suppliers to develop due diligence processes to meet our obligations to ensure that all products are responsibly manufactured.

Quality – Suppliers must ensure their products and services meet our company's quality and safety standards. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product or service that meets or exceeds the contractual quality requirements.

Counterfeit Parts – We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

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Ethics Program Expectations

Whistleblower Protection – We expect our suppliers to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions. We further expect our suppliers to provide any legally required notice of whistleblower rights to their employees.

Consequences for Violating Code – In the event of a violation of any of the above expectations, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities.

We reserve the right to terminate our relationship with any subcontractor or supplier under the terms of the existing procurement and/or purchasing contract.

Ethics Policies – Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct.

We encourage our suppliers to implement their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services.

Reporting Concerns

Concerns from our Business Partners can be addressed by calling our Legal Department at (301) 944-3252.

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