

Title:	Code of Ethics for Senior Financial Officers		
Document Number:	AM-LEG-PL-0602-AM	Revision Number:	0
Document Type:	Policy	Date Last Revised:	27 September 2024
Issuing Process:	Legal Services	Data Classification:	Internal
Process Owner	Chief Legal Officer	Page:	Number: 1 of 2

1.0 Purpose and Introduction:

To promote honest and ethical conduct, including the ethical handling of conflicts of interest; promote full, fair, accurate, timely and understandable disclosure; promote compliance with applicable laws and governmental rules and regulations; and deter wrongdoing.

2.0 Applicability:

Amentum Holdings, Inc. (the “Company”) has adopted this Code of Ethics (this “Code”) for its Chief Executive Officer, Chief Financial Officer and Chief Accounting Officer and Controller (the “Senior Financial Executives”).

2.1 Exclusion: None

3.0 Policy

3.1 The Senior Financial Executives:

- 3.1.1 are expected to engage in honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- 3.1.2 will endeavor to make, and to promote the making by others of, full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in other public communications made by the Company;
- 3.1.3 will comply with, and use their best efforts to ensure the Company complies with, applicable governmental laws, rules and regulations; and
- 3.1.4 will promptly report any violation or suspected violation of this Code to the Audit Committee or to a responsible member of Senior Management of the Company.

The foregoing are statements of mandatory conduct, and any waiver of, or amendment to, the requirements set forth in this Code will be subject to public disclosure. Any waiver of this Code with respect to a Senior Financial Executive shall be made only by the Board of Directors or a committee thereof. Violations of this Code shall be investigated and appropriate disciplinary action will be taken in the event of any such violation, up to and including termination.

4.0 Records: None

Record	Description	Responsible Individual or Organization	Media, Location, and Indexing Method	Minimum Retention and Disposition

5.0 References:

5.1 None

6.0 Attachments:

6.1 None

Title:	Code of Ethics for Senior Financial Officers		
Document Number:	AM-LEG-PL-0602-AM	Revision Number:	0
Document Type:	Policy	Date Last Revised:	27 September 2024
Issuing Process:	Legal Services	Data Classification:	Internal
Process Owner	Chief Legal Officer	Page:	Number: 2 of 2

7.0 Revision History Table:

Revision History Table		
Revision Number	Date Revised	Revision Summary
0	27 September 2024	Initial document release.
Select Revision Number	Select a date.	
Select Revision Number	Select a date.	