



# Amentum's Code of Conduct for Our Business Partners

July 3, 2023

**Amentum**

4800 Westfields Blvd, Suite 400  
Chantilly, VA 20151

[www.amentum.com](http://www.amentum.com)

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**General Disclaimer:** *This Business Partner Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, Business Partners must first adhere to applicable laws and regulations, then the contract terms, followed by this Business Partner Code of Conduct.*

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Dear Colleague,

Amentum is committed to supply chain performance excellence to drive value and impact for our customers and communities. Our supply chain framework is built upon sustainable business practices to positively impact performance, people, and the environment.

We are committed to establishing a safe, secure and diverse supplier base. Our goal is to partner with responsible companies that share our values and commitment to high ethical standards. Our Business Partner Code of Conduct outlines our expectations as to what we require of ourselves and our partners to minimize performance risk, improve business practices and work together on initiatives that will positively impact our communities today and in the future.

Amentum understands that our supply chain sourcing decisions can have potential impacts to both the environment and our communities. We are committed to being environmentally and socially responsible by complying with all local environmental, health and safety regulations. We hold ourselves to the highest standards and look to our partners, as part of the global value chain, to engage in promoting an ethical culture of sustainability through all aspects in the delivery of their products and services.



We pledge, within the global community, to advocate for improvements in human rights, business diversity and other initiatives to advance a safer workplace and community.

Sincerely,

A handwritten signature in black ink that reads "John Heller".

John Heller  
Amentum CEO

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**Introduction**

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 our corporate 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.

**1.0 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. We expect our Business Partners to operate with the same level of integrity. In addition to selecting Business Partners who demonstrate the same level of integrity that we do, Amentum also considers small business and diversity when selecting Business Partners.

**2.0 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.

**Values**



**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 (FAR), Defense Federal Acquisition Regulation Supplement (DFARS) 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 Our Business Partner** – We recognize that our relationships with our Business Partners 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. As part of Amentum’s due diligence process, we evaluate our Business Partners on their practices in areas such as environmental, labor, and human rights compliance.

### **3.0 Compliance with Laws**

Our Business Partners 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, Business Partners must comply with local laws and regulations, in addition to the applicable U.S. laws.

### **4.0 Protecting Property**

Amentum and our Business Partners are responsible for protecting company and government-owned assets from loss, damage, misuse, theft, and waste by using them accordingly and only for business purposes.

### **5.0 Information Protection**

**Confidential/Proprietary Information** – We expect our Business Partners to properly handle confidential or proprietary information, Personally Identifiable Information (PII), and any Federal Government Controlled Unclassified Information (CUI) including

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 Business Partners to respect and comply with all laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

**Information Security** – Business Partners 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. Business Partners must comply with all applicable data privacy laws and shall assure extension of this requirement to all lower-tier subcontractors

### **6.0 Cybersecurity**

We expect our Business Partners 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.

### **7.0 Maintain Accurate Records**

We expect all our Business Partners 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. Business Partners 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).

## 8.0 Human Rights

We expect our Business Partners to adhere to human rights policies and applicable laws related to human rights and 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.

**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. As such, we expect our Business Partners to maintain a similar work environment.

**Child Labor** – We expect our Business Partners 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** – Business Partners must adhere to regulations prohibiting human trafficking and forced labor and comply with all applicable local laws in the country or countries in which they operate. Business Partners must refrain from violating the rights of others and immediately address and promptly disclose to Amentum any adverse human rights impacts of their operations. Business Partners must educate employees on prohibited trafficking activities, discipline employees found to have violated the law or rules and notify Amentum of suspected or known violations and action taken against employees. Specifically, Business Partners will be prohibited from the following in all contracts.

- Destroying, concealing, or confiscating identity or immigration documents.

- Using misleading or fraudulent tactics in recruiting.
- Charging 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; and
- 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.

## 9.0 Employment Practices

**Harassment** – We expect our Business Partners 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 Business Partners 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.

**Wages, Benefits and Hours** – We expect our Business Partners to pay their workers at least the minimum compensation required by applicable local law and regulation, and provide all legally mandated benefits in a timely manner. Our Business Partners must also operate in full compliance with all applicable labor laws in regard to wages, work hours, vacation time, overtime and holidays.

**Immigration Laws Compliance** – We expect our Business Partners shall only engage workers who have a legal right to work.

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

### **10.0 Anti-Corruption**

**Anti-Corruption Laws** – Our Business Partners 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 Business Partners 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. Payments are permitted where there is an imminent threat to health or safety.

We expect our Business Partners 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 Business Partners 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.

### **11.0 Antitrust & Fair Competition**

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

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

### **12.0 Gifts/Business Courtesies**

We expect our Business Partners 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 Business Partners 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.

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

### **13.0 Conflict of Interest**

We expect our Business Partners 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 Business Partners 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.

### **14.0 Environment, Health, and Safety**

We always strive to lead 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. As such, we expect our Business Partners to maintain a similar EHS program.

**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, the public, or its Business Partners have the responsibility to stop work and report the situation to an Amentum supervisor or manager with no fear of retribution.

**Environmental Management** - We expect our Business Partners to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our Business Partners 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 Business Partners to comply with all applicable environmental, health and safety laws, regulations, and directives. Business Partners shall protect the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

#### **15.0 International Trade Compliance**

**Security** – When applicable, Business Partners 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 Business Partners 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 Business Partners 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** – Business Partners 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 31<sup>st</sup>. We expect our Business Partners to develop due diligence processes to meet our obligations to ensure that all products are responsibly manufactured.

**Quality** – Business Partners must ensure their products and services meet our company's quality and safety standards. We expect our Business Partners 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 Business Partners 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.

#### **16.0 Ethics Program Expectations**

**Whistleblower Protection** – We expect our Business Partners to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation.

We expect our Business Partners to take action to prevent, detect, and correct any retaliatory actions. We further expect our Business Partners to provide any legally required notice of whistleblower rights to their employees.

**Consequences for Violating Code** – We have the right to audit and monitor Business Partner's compliance with this Code of Conduct and expect Business Partners to comply with reasonable requests for assistance for investigations into potential violations of this Code of Conduct.

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 Business Partner under the terms of the existing contract with Amentum.

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

We encourage our Business Partners 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.

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### **Reporting Concerns**

Business Partners must report suspected or known violations of this Business Partner Code of Conduct to Amentum and must adequately investigate all credible reports, take necessary corrective action, and provide Amentum with sufficient information to allow Amentum to satisfy its own compliance requirements. In addition, Business Partners must promptly report any known or suspected misconduct involving Amentum employees. Concerns from our Business Partners can be reported by contacting the Amentum Ethics Hotline: <https://www.amentum.com/ethics-compliance>

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