



# Amentum's Code of Conduct for Our Business Partners

October 4, 2024

**Amentum**

[www.amentcom](http://www.amentcom)

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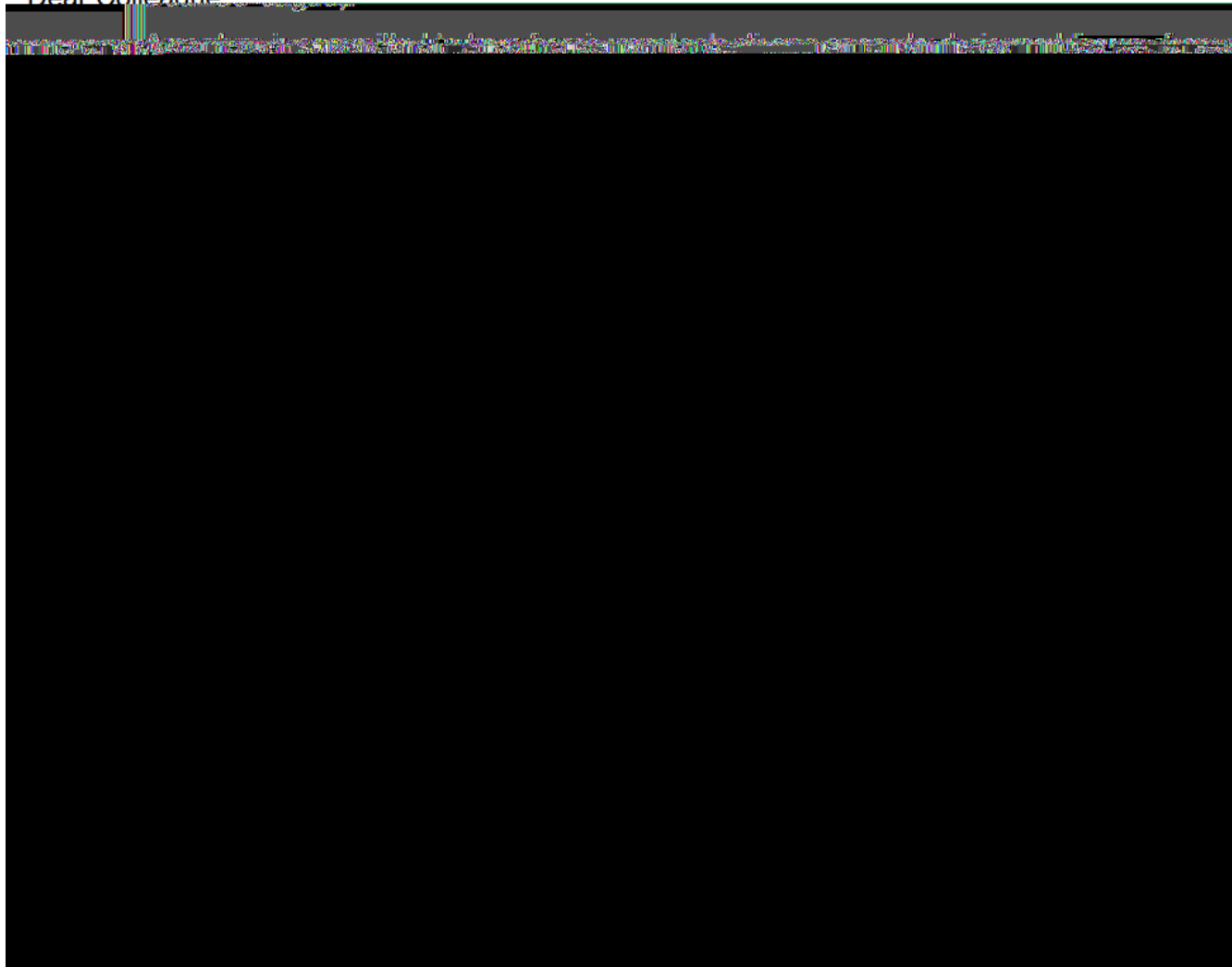
General Disclaimer:

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**Attachment to AM-ETH-PL-0002-AM Business Partner Code of Conduct**



Dear Colleague







that as a trusted Partner, our expectation is your supply chain complies with all elements reflected in this Business Partner Code of Conduct.

**Working with Governments and International Organizations** – We are committed to complying with legal, regulatory, and contractual requirements that apply to our contracts with governments and international organizations such as the United Nations (UN) and North Atlantic Treaty Organization (NATO) as well as our commercial clients. We adhere to the Federal Acquisition Regulation (FAR), Defense Federal Acquisition Regulation Supplement (DFARS) and Agency Supplements, public laws and regulations of all countries in which operations occur or services provided, contractual requirements, as well as our company policies and procedures that are tailored to the U.S. federal government and



**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**



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 appropriate work authorization in accordance with applicable laws.

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

### **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 the 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, agent, representative, 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.

### **Money Laundering Prevention**

We are committed to complying with applicable anti money laundering and anti terrorism laws We only conduct business with reputable Business Partners involved in legitimate business activities with funds derived from legitimate sources

### **Antitrust & Fair Competition**

**Anti-Trust** – We are committed to conducting business in full compliance with anti-trust and fair competition laws. 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 cartels.

**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, anti-competitive, or unethical business practices such as limiting



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.

**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



**Our Business Partners shall provide all necessary documentation and/or information for export/import formalities, as required and upon request, including product-level export control classification and Harmonized Tariff (HTS) information.**

**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**





**maintained by presenting consistent message campaigns through print and online media. As a publicly held, multi-national company, we handle media and official social media interaction at the corporate level. We also have special considerations and legal responsibilities as a publicly traded company and must adhere to the rules of the Securities and Exchange Commission (SEC) as well as other agencies on occasion. All requests for media interaction undergo a corporate communications review and approval process.**