

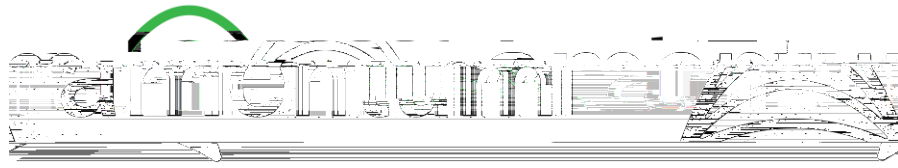
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Code of Conduct

November 27, 2024



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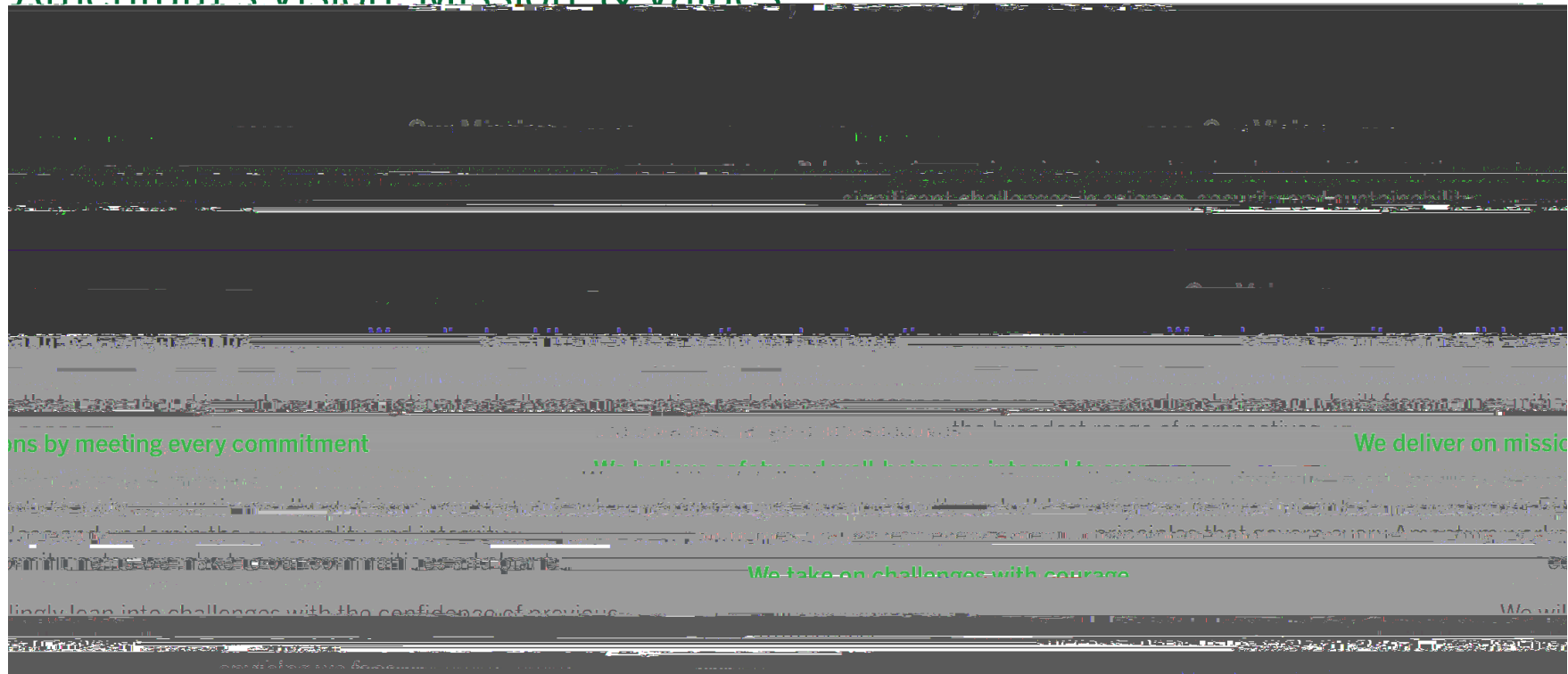
A Message from our Chief Executive Officer

At Amentum, we have a reputation that has collectively been built over the last century in providing outstanding performance to our customers. This includes our commitment to integrity and honesty. Around the world, our customers trust us. A key element in that level of trust is our commitment to ethical behavior, which has formed the foundation of all of the great work performed by our colleagues through our rich and accomplished history.

Amentum's ethical culture is described in our core value to have unwavering integrity in all that we do. Our Code of Conduct ("Code") is our guide. It defines ethical behavior across a range of topics and serves as a critical resource in helping us to make ethical decisions wherever we



Amentum's Vision, Mission & Values





Introduction

Inspiring Integrity in All We Do

At Amentum, we share a commitment to doing the right thing, every day, in every interaction, and in every location where we operate. We believe this commitment will serve us well today and continue to serve us and fuel our growth in the years ahead.

Our Code is a critical resource in this respect. It addresses our company's professional, ethical, financial, and social values. It sets forth what is expected of all employees, and it represents



Asking Questions and Reporting Concerns

It is important to raise questions and come forward with concerns. Early detection allows





Promoting a Safe and Respectful Workplace

Environmental, Health, and Safety (EHS)

We empower our people to embrace safety first in order to be well, excel at our mission, and achieve business success. We relentlessly pursue safety excellence to identify best practices, improve outcomes, and optimize our operational performance.

Do the Right Thing:

Comply with all applicable laws, regulations, and company programs and procedures related to the EHS aspects of the work we perform and the facilities we control.

Be responsible for your own safety as well as the safety of those working with and around you.

When you believe an EHS violation exists or that a situation poses the potential for physical harm or imminent danger affecting Amentum employees, its customers, subcontractors, general contractors, or the public, stop work and report the situation to a supervisor or manager with no fear of retribution.

Immediately report to a supervisor:

- All occupational injuries and illnesses, no matter how minor and obtain management approval prior to seeking medical treatment for all non-emergency work-related injuries and illnesses
- Any prescription or non-prescription medication that may affect your ability to work safely or operate machinery (including driving a vehicle)

Perform a Task Hazard Assessment (THA) before engaging in any physical activity that has one or more hazards associated with it.

Wear all furnished Personal Protective Equipment (PPE) in accordance with manufacturer instructions and applicable regulations. Always inspect equipment before each use.

Wear installed seat belts and shoulder harnesses when operating or riding in any vehicle on company business.

Do not use a personal or company mobile communication device while driving a vehicle on company business.

Only operate, perform maintenance of, or repair equipment if properly trained and/or certified to operate, maintain, and/or repair the equipment. Operate all vehicles and equipment in accordance with applicable



Diversity, Equal Employment Opportunity, and Non-Discrimination

Amentum is committed to fostering a workplace where everyone is

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Do the Right Thing:

Promote a positive attitude to build a professional, respectful, and harassment-free workplace — speak up if a co-worker's conduct makes others uncomfortable.

Report all incidents of harassment (including sexual harassment).

Find Out More

Preventing Workplace Harassment, Bullying, and Workplace Violence Policy

Harassment is ...

Any action that creates a hostile, intimidating, or offensive work environment. It can be sexual or nonsexual in nature and includes:

Making verbal remarks (comments, suggestions, jokes, or requests for sexual favors)

Sharing or discussing inappropriate images (drawings, photographs, or videos)

Engaging in physical behavior (suggestive looks, leering, or unwelcome touching)

Human Rights and Global Employment Standards

As part of our commitment to our global community, we seek to maintain a positive, productive work environment and to uphold individual human rights in our actions. It is the responsibility of all Amentum employees to seek to prevent or minimize any negative impact our business might have, such as harm to our workforce, the community, or the environment.

We respect the employment laws of the locations in which we conduct business. We have a zero-tolerance policy with regard to the use of forced labor, child labor, or human trafficking. We prohibit the use of fraudulent or misleading recruitment practices, charging recruitment fees, and destroying, confiscating, or otherwise denying access to employee identification documents. Solicitation or procurement of commercial sex acts (sexual activity in exchange for anything of value) is expressly prohibited. Do the Right Thing:

Remember that respect for human dignity begins with our daily interactions with each other and with our suppliers and customers. It includes promoting diversity, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business.

Seek guidance from In-House Counsel regarding the employment law standards in the various countries where we do business or are planning to do business. Never knowingly conduct business with subcontractors, business partners, suppliers, or third parties who violate laws designed to protect human rights.

If you have reason to believe Amentum is conducting business with an individual or company engaging in forced labor or human trafficking practices, report the misconduct immediately.

Find Out More

Combating Trafficking in Persons Policy



Find Out More

Corporate Social Responsibility and Charitable Activities Procedure

Political Activity Procedure



Familiarize yourself with the standards and specifications that apply to the projects you work on and follow company guidance designed to protect the quality and safety of our products and services.

Immediately raise any quality or safety issues with your supervisor.

Practice due diligence in the selection of our suppliers, contractors, agents, consultants, and other business partners. Do business only with companies that meet our high standards and hold them accountable for assuring the quality of the goods and services they provide to us.

Quality means meeting customer requirements. To deliver exceptional quality, we:

Lead quality at all levels

Empower employees

Manage operational risk

Advance organizational training

Working with the Government

We are committed to meeting the many special legal, regulatory, and contractual requirements that apply to our government contracts. We have systems, policies and procedures in place designed to help us follow the Federal Acquisition Regulation and Agency Supplements, public laws, the requirements of the contract, as well as operational and functional company policies and procedures specific to the federal government contracting environment.

The government imposes unique accounting, administrative, billing and invoicing, product quality, inspection and testing, progress reporting, and performance obligations and requirements. Every employee involved in performing under government contracts must be aware of and fully comply with the requirements of the contracts they help to perform. Remember that these requirements may also flow down to individuals and companies working on our behalf.

Do the Right Thing:

Understand the unique legal requirements and restrictions associated with our government work and remember that transparency and accountability are fundamental in not only winning but also retaining our government business.

Promote procurement integrity by competing fairly and ethically throughout the bidding and negotiating processes.

Protect any government-furnished property that is entrusted to you — comply with our system of internal controls that is designed to effectively manage the property in our possession.

Ensure that any quality testing, inspections, or programs, as required, are properly conducted and documented.

Make sure all representations, certifications, reports, data, and other statements that you submit on behalf of Amentum are accurate and truthful.

Be alert to — and speak up about — any instances of potential fraud, waste, or abuse.

Find Out More

Cost Estimating System

Contract Administration Manual

Truthful Cost or Pricing Data Procedure

Working with Suppliers

We recognize that our relationships with suppliers, consultants, and other third parties are critical to our success, so we work with business partners who live up to our high standards. Sometimes, we work as a subcontractor ourselves and must meet our subcontract performance requirements as a good business partner to our prime contractors. We honor our contractual obligations and require that our business partners, in turn, honor theirs.



Do the Right Thing:

If you are involved in the selection of our business partners, including joint venture partners — or in situations where we perform as a subcontractor — base decisions on our company's needs and on objective criteria such



Following the Letter and the Spirit of the Law

Cooperating with Investigations

We comply with requests for information from government and regulatory agencies, as required by law, and we cooperate fully with investigations. If we receive an inquiry from a government official or agency, we promptly contact In-House Counsel for assistance and never provide information before obtaining permission to do so.

Do the Right Thing:

Be cooperative and forthright in dealings with auditors or investigators — provide truthful, accurate, and complete information.

Never conceal, alter, or destroy any requested records, and never attempt to exert improper influence on the results of an investigation or audit.

What If?

My business unit was recently reviewed by Audit Services for the first time since it was acquired a year ago. The audit team reviewed expense report reimbursements and petty cash processes and has asked a lot of questions about some of the payments. Should I cooperate with the audit team?

Yes. An audit is one of the key means by which Amentum meets its responsibilities to its management, its employees, and its customers. Our company relies on accurate and complete records as the basis of our financial system, and all of us have a duty to cooperate fully and completely with audits and investigations.

Insider Trading

In our work for Amentum, we may sometimes have access to



Fair Competition

Because Amentum competes based on the quality of our products and services, we are committed to promoting fair competition at all times. We must never engage in or support unfair or predatory business practices or any activities that would improperly restrain trade. We compete fairly for all business and are committed to maintaining the integrity of the procurement process. Amentum prohibits collusion, price fixing, bid rigging/suppression, antitrust violations, and all other anti-competitive behavior.

Do the Right Thing:

Do not participate in any activity that may violate or give the appearance of violating competition laws, such as agreements about:

- o Prices, terms, or conditions of sale.
- o Dividing or allocating customers, bids, markets, or territories.



Do the Right Thing:

Work honestly and with integrity — avoid even the appearance of anything improper or corrupt.

Choose third parties carefully. We are responsible for actions they take on our behalf, so use due diligence in the selection process and monitor business partners closely to ensure they, too, work honestly and with integrity.

Be aware of laws such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, which prohibits directly or indirectly giving and/or receiving bribes, and requires maintenance of accurate books of account, with all company transactions being properly recorded.

Be on heightened alert when working with government officials or employees. The laws of the U.S. and many other countries assess a significant penalty for bribing a government official (and the definition of a "government official" includes individuals you may not expect such as federal, state, provincial, or local government employees, political candidates, and even employees of businesses that are owned by a government). Never give anything of value, even something you think is nominal, to a government official without first receiving approval from In-House Counsel.

Avoid paying "facilitating payments" — these are small, infrequent payments made to a government official to expedite the performance of routine government actions such as issuing visas and work permits. If you have any question regarding whether a payment is permitted, you should contact In-House Counsel before offering, promising, or making the payment. Some countries' laws (such as the U.K. Bribery Act) prohibits making facilitating payments.



Maintaining a Drug-Free Workplace

As a contractor to the U.S. government, Amentum is subject to the Drug Free Workplace Act. We provide our employees with a safe, healthy workplace that is drug-free and will not tolerate the use, sale, or purchase of illegal drugs or the abuse of prescription or over-the-counter medications, alcohol, or other substances.

International Work

Amentum regularly conducts business in countries around the world. Our laws are designed to ensure that U.S. origin products, services, and technology do not end up in the hands of countries or groups that would use them to compromise U.S. national security. As such, we must strictly comply with applicable U.S. and host-country laws and regulations that govern international business. This includes the export to import from, or movement between foreign countries of items and technical data, re-exports, deemed exports, and the transfer of services and technical data to non-U.S. persons. We comply with the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR), and other regulations of the U.S. or other countries that may apply. Any violation of these laws, even through ignorance, could have damaging and long-lasting effects on our business.

Do the Right Thing:

If your job involves the movement of products, services, or technology across borders, make sure you:

- o Follow our International Trade Compliance procedures that require the involvement of the International Trade Compliance Department.
- o Have a working knowledge of U.S. and host-country export/import laws and regulations and know when an export/import authorization may be required if you are involved in international business or seek advice on these topics from the International Trade Compliance Department or outside counsel.
- o Screen suppliers and vendors following our due diligence screening instruction to ensure we comply with US sanctions, embargoes, and prohibited activities with certain parties.
- o Are alert for illegal boycott requests — U.S. law prohibits us from cooperating with unsanctioned boycotts, regardless of where we are located. Help us ensure that nothing we do or say could be seen as part of a boycott.



Your Annual Training Requirement

Amentum's reputation as a premier global government partner whose experience, passion, and purpose drive mission success depends on you! Our culture of operational excellence, safety, and ethics was formed throughout our 100-year heritage and sharpened by our unrelenting dedication to the customer's mission.

Amentum's reputation and success depend upon each of us meeting our obligations under this Code. Our employees are required to attend and participate in an annual ethics training session ensuring that everyone is reminded to:

- Read and understand our Code.

- Comply with our Code.

- Report any violations of the Code, our policies, or the law.

- Understand that there is a non-retaliation rule.

- Disclose any possible conflicts of interest.

- Contact their supervisor, another member of management, or any of the other resources listed in our Code if they have questions or do not understand what is expected of them.

