

Title:	Code of Conduct		
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Process Owner	Chief Ethics & Compliance Officer	Page Number:	1 of 29

1.0 Purpose and Introduction:

To catalog the Amentum Code of Conduct within the Amentum Documented Information Management policy architecture.

2.0 Applicability:

This documented information applies to all Amentum employees, including employees of all legal entities under Amentum’s exclusive control. Other corporate entities such as Joint Ventures (JVs) and Limited Liability Companies (LLCs) should refer to their respective operating agreements and governing documents to determine the applicability of Amentum policies and procedures.

2.1 Exclusions: None

3.0 Policy:

Responsibilities

3.1 The Amentum Board of Directors will approve and authorize this Policy.

3.2 The Chief Ethics and Compliance Officer (owner) will:

3.2.1 Implement changes to the Amentum Code of Conduct as required.

3.2.2 Routinely assess the effectiveness of the Code of Conduct and implement necessary actions to enhance its effectiveness.

3.2.3 Annually review the Amentum Code of Conduct and update as necessary.

4.0 Records: None

5.0 References:

5.1 [AM-QUA-PL-0901-AM, Documented Information Management](#)

6.0 Attachments:

6.1 Code of Conduct

7.0 Revision History Table:

Revision History Table		
Revision Number	Date Revised	Revision Summary
3	10 September 2026	Annual review and update. Updated policy references and added new topics (applies globally, personal information, and using artificial intelligence responsibly). Clarified that all outside employment, consulting, and Board participation requires Amentum approval in accordance with policies. Functional leads reviewed their sections and provided administrative updated narratives.
2	08 April 2025	Updated various areas in accordance with U.S. Federal guidance.
1	27 November 2024	Updated page 29, Helpful Resources, paragraph 2 regarding Hotline contact information.
0	27 September 2024	Initial Release as Amentum Holdings, Inc. (“Amentum”)



Code of Conduct

September 10, 2026

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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.

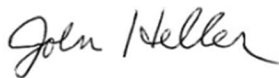
Amentum's ethical culture is described in our core value to have unwavering integrity in all that we do. Our Code of Conduct ("Code") is our guide. It defines ethical behavior across a range of topics and serves as a critical resource in helping us to make ethical decisions wherever we do business in the world. If you are ever in a situation where you are unsure how to act or have a question about the right thing to do, consult the Code. Although it cannot cover every situation you may face on the job, it will point you to a variety of resources for help with any issue.



I also encourage you to speak up. If you see or suspect conduct that violates our Code, our policies, or the law, please share your concerns with your manager, your human resources representative, the ethics hotline, or the Amentum leadership. At Amentum, we do not tolerate retaliation against employees who raise concerns in good faith. As we take the company forward, it will require all of us to conduct business consistent with our Values and compliant with the law to ensure our long-term success.

I am excited and confident about Amentum's future. A key aspect of that is your commitment to act with integrity and excellence in everything we do as we advance the future together. Thank you for everything you do in making Amentum one of the most trusted companies in the industry.

Sincerely,

A handwritten signature in black ink that reads "John Heller". The signature is fluid and cursive.

John Heller

Chief Executive Officer

Amentum's Vision, Mission, & Values

Our Mission

Bringing advanced engineering and technology solutions to the most significant challenges in science, security and sustainability

Our Vision

Creating a secure and vibrant future

Our Values

We realize breakthroughs by continuously reinventing

We apply undaunted curiosity, relentless ambition and boundless imagination to challenge convention and drive progress.

We deliver on missions by meeting every commitment

We sweat the details, because success on even the largest projects requires consistently and ethically delivering on our promises with quality and integrity.

We take on challenges with courage

We willingly lean into challenges with the confidence of previous success and with the conviction that, together we can conquer anything we face.

We embrace collaboration & employee engagement

We actively seek to learn from others, knowing that the most future-ready solutions are built from communities that respect and include the broadest range of perspectives.

We believe safety and well-being are integral to success

Physical and emotional security and development are fundamental principles that govern every Amentum workplace and underpin the commitments we make to our communities and planet.

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 sets forth what is expected of all employees and it represents the pledge we take to serve our customers, business partners, and the communities in which we live and work.

Of course, one document cannot possibly address every law, rule, policy, or scenario we may encounter in our daily work. We have a structured approach to Policy, Procedure, and Instruction (PPI) management that provides written guidance on how to handle business situations within the company. All our PPI are available to Amentum employees on the Amentum intranet – branded as “OneJavelin.” In addition to our Code and the PPI, Amentum has other resources available to help. These resources are identified throughout the Code.

Amentum counts on each of us to use good judgment and seek guidance when we need it, and in situations where the right course of action is unclear, to ask ourselves:

- Would my action comply with the law, our Code, and our company policies?
- Is it consistent with my personal standard of professional conduct?
- Does it reflect honesty, integrity, and high standards of ethical behavior?
- Would I be comfortable if customers, co-workers, professional colleagues, family, or friends knew about my action

If the answer to all of these questions is “yes,” the decision to move forward is probably acceptable, but if the answer to any question is “no” or “I’m not sure,” stop and seek guidance from your supervisor, another member of management, or any of the resources listed in our Code.

One Amentum, One Code

Our Code applies globally to all Amentum employees, officers, and directors, including those of our wholly owned subsidiaries. Our Code has been approved by the Board of Directors. In addition, only the Amentum Board of Directors or a Board Committee may waive any provision of the Code for directors or executive officers.

We also expect our suppliers, agents, business partners, consultants, licensees, subcontractors, and other third parties to be aware of and adhere to the ethical standards described in our Code.

Our Vision and Values serve as the foundation of our Code and help us preserve our reputation for doing business the right way. In fact, the way in which each of us embodies our company’s Values, as expressed in the Code, is included in our policies and procedures for workplace management, which govern expected behavior.

Regardless of our role, we all have a responsibility to:

- Read, understand, and follow our Code and company policies, paying particular attention to the topics that apply to our specific job responsibilities.
- Attend and participate in required annual training on the Code and other assigned learning.
- Report concerns about possible violations of our Code, our policies, or the law to the appropriate party.
- Cooperate and tell the truth when responding to an investigation of a potential violation of our Code.

Our leaders serve as resources and role models for proper business conduct, so they have additional responsibilities when it comes to upholding our Code, and they are expected to:

- Promote a positive working environment where people are treated with dignity and respect and feel welcome.
- Create a culture of compliance, where open discussion about legal and ethical concerns is encouraged.

- Respond appropriately to employee questions about the Code and help employees feel comfortable in sharing their concerns.
- Be proactive in preventing and detecting violations of our Code, company policies, or the law, and immediately report violations through the available reporting channels.
- Ensure training is completed in a timely manner by all employees.
- Consider an employee's commitment to ethical conduct during the performance evaluation process.
- Ensure that we work with vendors, suppliers and other business partners that have a strong record of integrity and business ethics.

— What If?

My team is preparing a bid for some new business with a government-owned company in a country where Amentum has not done business before. At a meeting to discuss bid strategy, one of the members of our team asked some detailed questions about how we will handle compliance with anticorruption laws and sanctions for the bid. Our supervisor shut down the discussion, saying it is okay to take a few risks now and deal with “the red tape” later once we win. Was that the right response?

No. Your supervisor has a responsibility to not only listen to the individual's concerns but also ensure that business is conducted legally, ethically, and in compliance with the law. Anything less could harm Amentum's reputation and its ability to do business around the world. If you suspect your supervisor may be taking actions that violate our Code, you have a responsibility to speak up to another member of management or any of the resources listed in our Code.

Complying with Laws, Rules and Regulations

Amentum is a worldwide company with operations in numerous countries and territories. We are headquartered in the United States and listed on the New York Stock Exchange. Laws, rules and regulations differ among the various locations where we conduct business, but we understand our obligation to know and follow the laws, rules and regulations (as well as any national and international restrictions) that apply to our business and the countries where we operate.

Many of our customers also have their own codes of conduct and may ask us to comply with them as part of our work. If you are ever unsure about whether a law, rule, regulation or other obligation applies — or if there is a conflict between a local law or another company's code and this Code — contact your supervisor, another member of management, or any of the resources listed in our Code for additional guidance.

In addition, you must abide by Amentum's internal policies, particularly the Enterprise Approval Matrix and Delegations of Authority Policy, which sets out requirements for management review and serves as the basis for our authority to act on behalf of the company.

Asking Questions and Reporting Concerns

It is important to raise questions and come forward with concerns. Early detection allows Amentum to address problems before they become serious and take necessary corrective action. Our speak-up culture also promotes an atmosphere where people feel comfortable asking questions and working toward solutions.

To raise a concern or make a report, reach out to any of the following resources via email, online, phone, letter, or in person:

- Your supervisor, supervisor's manager, or any higher-level manager
- Your Human Resources representative or the Human Resources Department
- Amentum In-House Counsel or any member of the Legal Department
- Amentum Ethics and Compliance Office
- The Amentum Ethics Hotline via:
 - o Visit <https://amentum.ethicspoint.com>
 - o Call 1-844-950-1964 (within the U.S. and Canada)
 - o Call the country-specific numbers listed on the ethics posters at your locations and the intranet.

The Ethics Hotline is staffed by a third-party company operating 24 hours a day, seven days a week with worldwide language capability.

Amentum treats all reports confidentially to the extent we can, consistent with company policy, the law, and the requirements necessary to conduct a thorough investigation. Suspected violations may even be reported anonymously, where allowed by local law. All reports are reviewed promptly, thoroughly, and consistent with applicable law. If necessary, Amentum may report certain reports to the appropriate authorities.

Our Commitment to Non-Retaliation

Amentum does not tolerate acts of retaliation against anyone who, in good faith, makes an honest and sincere report of a potential violation of our Code, our policies, or the law, rules and regulations or participates in an investigation of possible wrongdoing.

Simply stated, it does not matter whether your report uncovers unethical behavior, if you have honest intentions in making it. Many countries have enacted legislation to protect those who report misconduct. Amentum enforces any applicable protections afforded by these kinds of laws.

Amentum wants employees to feel comfortable reporting suspected misconduct, including potential violations of laws, rules, regulations or our Code, and will promptly investigate all allegations of retaliatory acts. Anyone who retaliates against a person for making a good faith report or participating in an investigation will face disciplinary action, up to and including termination of employment.

— What If?

I have seen my supervisor act harshly toward a few of my co-workers. Performance has been suffering lately, and I assume my supervisor is simply frustrated with recent mistakes the team has made.

However, her behavior is becoming more aggressive and morale on the team is low. She has recently begun berating team members to charge less time to overhead and more time to projects, even though their billable work has slowed down.

I feel that I should tell another member of management about the kind of environment she has created and my concerns about the direction we are being provided with on time charging, but I am worried that I will be the next person she punishes. What is the best course of action?

You are right to be concerned about the negative atmosphere your supervisor has created. While her actions may or may not be a direct violation of our Code, the result of her behavior is a problem. You should take the matter to another

member of management or any of the resources listed in our Code. You — and all other Amentum co-workers who make an honest and sincere report of potential misconduct — should come forward without fear, knowing that Amentum does not tolerate retaliation and will take disciplinary action against those who retaliate.

Promoting a Safe and Respectful Workplace

Environment, 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:
 - o 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
 - o 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 regulations and manufacturers' instructions.
- Do not remove, damage, disable, or make ineffective any protective safety, guarding, fire-fighting equipment, or first aid equipment.
- Report, remove from service, or have repaired any tool or equipment that is damaged, not working properly, or may otherwise be hazardous if used.
- Complete all safety training required for your job function or tasks, including training that is specific to tools, equipment, or vehicles to be used.
- Always maintain good housekeeping, keeping work areas neat, clean, and free of hazards.
- Never participate in horseplay of any kind while on the job or on company premises.
- Always remain alert, heed all warning signs and posted safety instructions, and follow all work area guidelines and regulations for employee and environmental protection.

— Find Out More

Environment, Health, and Safety Policy

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.

Equal Employment Opportunity, and Non-Discrimination

Amentum is committed to fostering a workplace where everyone is treated with dignity and respect and feels welcomed. We believe our differing backgrounds, experiences, and perspectives inspire collaboration and positions us for growth in the marketplace. We are committed to attracting, developing, retaining, and promoting an engaged and well-qualified workforce who feel that they belong at Amentum. Amentum extends equal employment opportunities to all applicants and prohibits discrimination in the workplace.

Amentum emphasizes civility and respect in the workplace.

- We will not tolerate discrimination against anyone.
- We strictly forbid any form of harassment in the workplace.
- Abusive or intimidating behavior is not tolerated.

– Do the Right Thing:

- Treat all co-workers — as well as applicants for employment — with respect and in a fair, non-discriminatory manner.
- If you make hiring or other employment-related decisions on behalf of Amentum, do not discriminate based on any trait protected by law, including, but not limited to race, sex, pregnancy, age, ancestry, military or veteran status, color, religion, creed, disability, marital status, medical condition, genetic information, national origin, sexual orientation, or citizenship status.

– What If?

We have a new employee on our team, and most of my co-workers have been welcoming and helpful. However, one co-worker has expressed exasperation with the time it is taking the new employee to adapt to her new work environment. Many times, this co-worker rolls his eyes and sighs when she asks a question. Lately, he has begun asking her, “Don’t they teach you anything in your country?” and when he invites members of our team to go to lunch, he does not include her. Should I do something about this situation?

Yes. Learning to work in a new environment can be challenging — especially when faced with impatience or hostility. Your new team member deserves to work in an environment where she can be both comfortable and successful, consistent with our commitment to promoting a safe and respectful workplace. Your co-worker’s behavior is depriving her of that right. If you feel comfortable speaking to your co-worker directly, you should explain that his comments about the new team member are hurtful, offensive, and need to end. If you do not wish to approach him directly, or if you approach him and his behavior continues, you should reach out to your supervisor, another member of management, or any of the resources listed in our Code.

– Find Out More

Equal Employment Opportunity Policy

A Harassment-Free Amentum

Maintaining a respectful workplace also means that we do not engage in or tolerate any form of harassment. We expect all employees to accept and respect each other in a spirit of cooperation, courtesy, and consideration. We all have the right to work in an environment that is free from intimidation, harassment (including sexual harassment), bullying, and abuse. Regardless of the form it takes and the seniority of the people involved, harassment is a violation of our Code and has no place at Amentum.

- **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 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 do not tolerate 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 a safe and respectful workplace, 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
Combating Trafficking in Persons Compliance Program
Amentum Modern Slavery Statement 2026

Protecting Information and Property

Accurate Business Records

Accurate and complete business records give our company a comprehensive view of our operations and allow us to make well-informed business decisions. Keeping our records in order also helps us to build trust with our customers and our business partners. Each of us contributes to recordkeeping in some form and has a responsibility to be honest, accurate, and complete.

Knowingly making false statements or false claims to the U.S. and other governments, employees who violate these standards could subject the company and themselves to liability, damaging publicity, expensive and time-consuming audits and investigations, reduction in contract prices, and loss of government contracts. Moreover, the company and individual employees may be subject to criminal or civil penalties (e.g., imprisonment, fines, and/or suspension or debarment from government contracts), in addition to being subject to disciplinary action.

— Do the Right Thing:

- Ensure that the company's books and records accurately reflect all transactions.
- Know and follow our internal controls as well as our accounting practices and policies, being careful to obtain all necessary approvals and support documentation, where required.
- Submit accurate documentation in connection with any contract or proposal.
- Record all hours worked in accordance with our total time accounting, employee time reporting, and work time procedures.
- Ensure that hours worked are recorded properly.
- Do not knowingly charge an incorrect amount or knowingly approve such mischarging.
- Ensure that other costs (such as costs for materials, services, and travel) are appropriately charged to the correct project number.
- Comply with the records management policies and retention schedules that apply to your work and your location.
- If you are responsible for any aspect of our financial reporting, ensure that you meet all applicable procedural and legal requirements.
- Ensure that reports or disclosures about our financial records are full, fair, accurate, complete, objective, and timely.
- Report any accounting or auditing irregularities or incidents of fraud to the Ethics Hotline.

We do not tolerate any form of financial misconduct, including:

- Lying or making false or misleading statements — either verbally or in writing — about Amentum
- Hiding company funds
- Circumventing internal controls
- Mischaracterizing transactions
- Creating undisclosed or unrecorded fund accounts
- Intentionally mischarging labor hours or costs for materials and services

— What If?

Right now, I do not have any customer work to do, but I am concerned that my job may be at risk if I charge too much time to overhead. Is it okay to put time down on a fixed price contract since it will not hurt the customer?

No. You have a responsibility to ensure that every record — including your timesheet — is an accurate reflection of what transpired. Ensure your weekly time reports accurately reflect the hours worked and are charged to the correct category, work order, or project. You should discuss your work availability with your supervisor. The company follows the total time accounting concept and records all hours worked.

— **Find Out More**

Accounting and Financial Compliance Policy
Enterprise Finance Policy
Records Management Policy

Company and Customer Property

Protection and Proper Use of Company Assets

We have worked hard to acquire our valuable assets, both tangible and intangible. All employees, officers and directors are responsible for protecting our assets from loss, damage, misuse, theft, and waste. We can do this by using them wisely and only for legitimate business purposes. We also safeguard our customers' property when it is in our control, preventing its misuse, maintaining accurate inventories, and following appropriate protocols for disposal.

Physical and Electronic Assets

Amentum's physical property includes its buildings, facilities, vehicles, equipment, resources, and records. Our assets also include our computer resources, systems, networks, and internet and email access. These resources are provided for legitimate business purposes and while Amentum allows incidental, occasional personal use of assets like our internet/email system, such use must be kept to a minimum and not interfere with our work.

Use Company and Customer assets appropriately

- Protect resources from loss or harm.
- Ensure the security of our systems.
- Protect the items assigned to you.
- Look after our intellectual property.
- Keep passwords secure and don't share them with anyone.

— **Do the Right Thing:**

- Take care to avoid improper practices such as:
 - o Using Amentum or customer equipment or information systems to view, create, store, or send content that others might find offensive (including inappropriate, sexually explicit, or offensive images and materials) or for spreading discriminating or harassing comments or threatening or abusive language.
 - o Using Amentum or customer networks or systems to send, receive, or store any messages you intend to keep private. All information, data, and files on our systems belong to Amentum, and — to the extent permitted by applicable law — we reserve the right to monitor or disclose any messages, documents, or any other files on company or customer computers without notice.
- Use good judgment regarding the personal use of Amentum resources. Consult with your supervisor or manager with questions. Personal use of customer resources is generally prohibited.
- Follow our information resources policies and observe good cybersecurity:
 - o Take reasonable steps to protect our information and systems from accidental or unauthorized access.
 - o Use only Amentum-approved hardware, software, applications, and storage devices to access our systems.
 - o Do not download unlicensed or illegal material.
 - o Be vigilant in avoiding phishing, malware, ransomware, and other forms of attack that could put our systems at risk.
 - o Create strong passwords and do not share them with others.
 - o Promptly report suspected security incidents.

Protect Company and Customer Proprietary Information, including business plans, intellectual property, proposals, technical innovations, designs, inventions, patents, financial information, customer lists, and other information we produce as part of our work for Amentum.

– Do the Right Thing:

- Know the kinds of information you are handling and label it appropriately to indicate how it should be handled, distributed, and destroyed.
- Use and disclose proprietary information only for legitimate business purposes and share it only with those who are properly authorized or legally required to see it.
- Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. Never use another company's proprietary information when conducting business for Amentum and immediately report any accidental receipt of or offer to provide such information to In-House Counsel.

Intellectual property is ...

Creative work or ideas that represent a significant investment of our time and resources. It includes:

- Methods, know-how, and techniques
- Innovations and designs
- Patents, trademarks, and copyrights

Proprietary information is non-public information that, if disclosed, might be:

- Of use to competitors and/or
- Harmful to the company or its customers

- Make sure all third parties have non-disclosure agreements in place before you share proprietary information with them.
- Remember that in addition to protecting the proprietary information of Amentum, we must also safeguard the proprietary information of our customers, partners, and other third parties, as well as the personal information of our employees. This applies to disclosures to customers and prospective customers, as well as vendors and other third parties.
- Do not discuss company proprietary information, or proprietary information of our customers, partners and other third parties in public places (such as elevators, airplanes, and restaurants) and/or where others could hear it.
- Remember that the obligation to protect company proprietary information continues even after your employment with Amentum ends.
- If you discover or suspect the unauthorized use or disclosure of proprietary information, notify your supervisor, another member of management, or any of the resources listed in our Code immediately.

– What If?

I recently hired a technical expert who has a great resume with extensive experience with other companies. While working with her on a company proposal, I find that she has “inside information” to help in our proposal based on her experience with competitor companies. Can I take advantage of this proprietary information to help us win the work?

No. We respect the proprietary information of other companies, including our competitors and suppliers. The Code and our other policies expressly prohibit the use of competitor proprietary data obtained improperly. A good way to think about whether something is proprietary is to ask whether the information is private/non-public, and whether it is competitively useful. At times, we may need information about our competitors, but we only acquire publicly available information in a legal, ethical, and responsible manner. We should never pressure a co-worker to reveal proprietary information from a previous employer or accept any attempts by a co-worker to use proprietary data of competitors in any manner.

Data Privacy and Personal Information

We respect the privacy of our employees, our customers, and our business partners and understand the duty we have to protect their personal information. We strive to only use personal data or information when necessary for reasonable business purposes and will seek to limit the collection and storage of personal data to only what is necessary. We will collect and store personal data only as permitted by law. We have systems, policies and procedures in place to safeguard personal information from any unauthorized disclosure, ensure lawful processing of that data, and respond to any

requests regarding data rights. It is Amentum's policy to abide by the privacy and data protection laws in the countries and localities in which we do business.

— **Do the Right Thing:**

- Collect, use, process, store, and disclose personal information in accordance with data privacy laws and our policies — no one should access prospective, current, or former employee records (such as payroll, group insurance, benefits, and working files) without proper authorization.
- Do not disclose personal information to anyone, internally or externally, unless they have a business need for the information and have been properly authorized to receive it.

Personal information includes...

Anything that could be used to identify someone, either directly or indirectly, such as a name, social security number, email address, telephone number, or credit card number.

— **What If?**

I work in Human Resources and was recently contacted by a vendor who said he could offer our employees a substantial discount on some merchandise. Is there any problem with providing him with employee addresses since everyone would have an opportunity to benefit?

Yes. Employees' names and addresses are forms of personal information and should not be shared with anyone inside or outside of our company unless there is a legitimate business purpose for doing so. We have an obligation to respect the privacy of our co-workers and be good stewards of the information they share with our company.

— **Find Out More**

Data Privacy Policy
Privacy Inquiry and Complaint Handling

Classified and National Security Information

In our jobs, we are often entrusted with classified and national security information. Such information must be protected and may never be disclosed to unauthorized personnel unless approved by the authorized individuals within the relevant government bodies.

— **Do the Right Thing:**

- Take all steps necessary to protect classified and national security information and coordinate all activities related to this information with personnel who have appropriate clearances and the need-to-know. It is never appropriate to disclose this information to unauthorized persons.
- If you are required to obtain and maintain any form of clearance, you are expected to be knowledgeable of all responsibilities and obligations related to that clearance. If you have any questions or concerns, please contact Amentum Government Security.

— **Find Out More**

[Corporate Security OneJavelin Page](#)

Use of Artificial Intelligence (AI)

AI is a tool Amentum uses to drive innovation, enhance productivity, and deliver value to our people and clients. When used for work purposes, AI must be accessed only through company-authorized AI platforms and operated solely on company-approved devices. All AI use must be responsible and fully compliant with Amentum policies, meaning employees must apply AI in a secure, ethical manner that protects company and customer information.

— **Do the Right Thing:**

- Only use Amentum-approved AI tools and platforms.
- Comply with all applicable policies, contractual obligations, and laws when using AI.
- Handle data processed by AI tools responsibly, ensuring proper cybersecurity and privacy measures.
- Do not input confidential, proprietary, or personal information into AI systems.
- Avoid using AI tools to create, share, or distribute offensive, inappropriate, or harmful content.
- Seek assistance from the Amentum AI Advisory Council or appropriate Amentum representatives if you have questions or concerns.

— **Find Out More**

AI Governance Model Policy
AI Use Guidelines and Best Practices
IT Acceptable Use Policy
AI Usage and Restrictions

Confidentiality

All employees, officers and directors must maintain and protect the confidentiality of information entrusted to them by Amentum, or information that otherwise comes into their possession, during the course of their employment, work or while carrying out their duties and responsibilities, except when disclosure is authorized by Amentum in writing or legally mandated. The obligation to preserve confidential information continues even after employees, officers and directors leave Amentum. Employees, officers and directors may not discuss internal company matters or developments with anyone outside of the company, except as required in the performance of regular corporate duties and with authorization from the appropriate Amentum personnel.

Speaking on Behalf of Amentum

Providing our communities with an accurate picture of our operations, transactions, and intentions helps us to preserve Amentum's reputation. In order to do this, we need to provide only accurate and complete information and make sure that our company speaks with one consistent voice. Therefore, only those who have been designated to communicate on Amentum's behalf should make public statements about our company.

— **Do the Right Thing:**

- If a member of the media contacts you, follow Amentum Policy and refer the request to an Authorized Representative, as defined in the Policy on Fair Disclosure to Investors.
- If an investor, security analyst, or other key public contact contacts you for information, even if the request is informal, refer them to Corporate Communications.
- If a government official or attorney contacts you, refer them to In-House Counsel.
- Follow all Amentum policies and procedures when using social media and exercise good judgment and common sense — be responsible and respectful and protect the Amentum brand and business reputation. Never speak or act on our company's behalf unless authorized to do so.

— **Find Out More**

External Communications Policy
Social Media Policy
Fair Disclosure to Investors Policy

Political and Charitable Activities

Although Amentum encourages us to engage in activities that serve the communities where we live and work, our participation in political and charitable activities must always take place on our own time and at our own expense.

— **Do the Right Thing:**

- Make it clear that your personal views and activities (such as campaign work, fundraising, or speech making) are not those of Amentum, and never use Amentum resources (such as funds, facilities, computers or supplies) for your personal political or charitable activities.
- Do not make political contributions on behalf of Amentum. The company will not reimburse you for any personal political contributions you make or expenses you incur.
- Keep your personal political activities personal — never pressure co-workers or business partners to contribute to, support, or oppose any political candidate or party.
- Ensure that you understand the regulations regarding lobbying activity — Amentum is prohibited from using appropriated funds to influence elected officials in connection with government work. Consult with In-House Counsel with questions regarding lobbying activity.
- Amentum does make contributions to charitable and civic organizations in our local communities where our employees live and work, but we must follow our review and approval process for making these contributions.

— **Find Out More**

Corporate Social Responsibility and Charitable Activities Procedure
Political Activity Policy

Working with Our Customers and Business Partners

Honest and Fair Dealings

Our customer-centric ethic and mission orientation must never get in the way of complete honesty and accuracy in everything we say, do, or write. In order to serve our customers to the best of our abilities, we must always be truthful about what we can and cannot achieve. We tell the truth about our products, services, and capabilities and never make promises we can't keep.

Act with Integrity

We conduct business with honesty and respect towards co-workers, customers, suppliers, and our communities.

— Do the Right Thing:

- Treat each customer fairly and honestly.
- In discussing our capabilities, credentials, qualifications, and corporate history, whether verbally or in writing, be honest and accurate.
- Do not make false statements about our competitors.
- Never engage in unethical practices to gain an unfair advantage, such as misrepresenting facts, abusing privileged information, manipulating others, or improperly obtaining confidential information from competitors.
- Always provide customers with truthful and accurate information. If a situation is unclear, present a fair and accurate assessment to support informed decision-making.

— What If?

A long-standing and important customer of Amentum has asked me to certify that improvements have been made as part of obtaining a government permit. The improvements are in the process of being made, but they will not be completed by the time of the certification. What should I say?

If the improvements have not been made fully and completely at the time of the certification, you cannot certify that they have been made. Government and other entities rely upon certifications and representations we make as part of permitting and other approvals. False certifications or representations violate our commitment to integrity.

It is also important to keep in mind that many of our customers have strict rules about how to prepare and submit proposals, as well as rules for what types of proposal information we may obtain from the customer. We must make sure that we know and follow the rules that apply to our work.

— Find Out More

Business Development and Growth Policy

Quality Products and Services

Quality is central to our operations. Our reputation is only as good as our last delivery, and our quality processes and systems assure that every delivery supports our customers' mission requirements. We strive to always do the right thing the first time. When we fall short, we analyze the problem to identify the cause and correct it to prevent the mistake from happening again.

— Do the Right Thing:

- Honor our promises to our employees, customers, and delivery partners.
- Deliver services and products to our customers correctly the first time and identify delivery problems before our customers do.
- Commit to our customers' mission, taking ownership for solving our customers' problems and anticipate new opportunities.

- 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 contracts with government bodies. We have systems, policies and procedures in place designed to help us to comply with applicable laws, such as the Federal Acquisition Regulation.

The government bodies impose 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 Policy
Contract Administration Policy
Truthful Cost or Pricing Data Procedure

Working with Business Partners

We recognize that our relationships with suppliers, consultants, and other third parties are critical to our success. We collaborate with business partners who demonstrate standards of excellence. Sometimes, we take the role as a subcontractor ourselves and must meet the contractual and performance requirements of our subcontract. 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 as partner qualifications, price, quality, and past performance. Selection decisions should never be based on

personal bias or interests. If a family member or close friend has an interest in a company with which we seek to conduct business, remove yourself from the selection process and immediately disclose the conflict.

- Adhere to the requirements outlined in our Procurement Manual to ensure compliant practices are followed when procuring materials and services in support of our contracts.
- Deliver excellence, whether Amentum is serving as the prime contractor, joint venture partner, subcontractor, or another role on a project.
- Maintain high expectations — be alert for any potential conflicts of interest, human rights abuses, and acts of bribery or corruption, and speak up if you see or suspect a violation of our Code, our policies, or the law.

— Find Out More

[Business Partner Code of Conduct](#)

Conflicts of Interest

A conflict of interest can occur whenever a competing interest or activity interferes in any way, or even appears to interfere, with our ability to make objective, impartial decisions and perform work objectively and effectively — these conflicts may be personal (affecting you individually) or organizational (affecting Amentum). Conflicts of Interest also arise when an employee, officer or director, or member of their family, receives improper personal benefits because of their position in the company. Other areas where conflicts may arise are when we consider hiring former government employees or when our employees have access to non-public government information. Whether actual, potential, or perceived, conflicts of interest are not always clear-cut, so we must be proactive in disclosing them and work to make sure they are properly evaluated, monitored, and mitigated.

— Do the Right Thing:

- Be familiar with the types of situations where personal conflicts of interest often arise. The following examples represent common conflict situations you may encounter in your daily work.
 - o **Business with family and friends** — In selecting customers and business partners, we have an obligation to be impartial and do what is in the best interest of Amentum. If a family member or close friend has an interest in a company with which we conduct (or seek to conduct) business, you must remove yourself from the selection process and disclose the conflict immediately.
 - o **Corporate opportunities** — In the course of your work with Amentum, you may learn of potential business or investment opportunities, but you must not take personal advantage of these opportunities or refer them to a third party, use corporate property, information or position for personal gain, or compete with the company. Employees, officers and directors owe a duty to the company to advance the legitimate interests when the opportunity to do so arises.
 - o **Outside employment or consulting** — Employment or consulting with another organization can also create a conflict of interest. All outside employment or consulting must be pre-approved in accordance with Amentum policy. In general, you may not accept another job or outside opportunity that interferes with your ability to do your work for Amentum or that competes with current or future Amentum business.
 - o **Investments** — Amentum does not seek to control your personal financial decisions. However, some outside financial interests may improperly influence — or could be perceived by others to influence — the decisions you make on behalf of Amentum. Investments in Amentum's competitors, customers, suppliers, or other business partners are generally acceptable, but the amount of the investment must not be so significant that it would affect your business judgment.

A personal conflict of interest occurs when ...

We use our position at Amentum, or information we have acquired during our employment, in a way that may create a conflict or the appearance of a conflict between our personal interests and those of our company or its customers.

- o **Personal relationships** — Supervising anyone with whom you have a family or romantic relationship can give rise to the appearance of favoritism. Therefore, you should never be in a position where you supervise or otherwise make employment decisions that affect your immediate family members or anyone with whom you have a romantic or intimate relationship.
 - o **Serving on a board of directors** — Amentum encourages employees to make a positive difference in their communities. All employees must declare any Board participation in accordance with Amentum policies.
- Avoid Organizational Conflicts of Interest (OCI). These occur when work is performed by a contractor on a federal contract and may:
 - o Result in an unfair competitive advantage for the contractor.
 - o Impair the contractor's objectivity in performing federal contract work.

OCI, or even the appearance of OCI, must be avoided at all times, as they can result in Amentum being excluded from contract competitions, contract terminations, or suspension and debarment from future federal contract work. OCI can also arise in situations where you are working with someone who may be unable to provide impartial assistance or advice. You should consult with Contracts or your In-House Counsel with any questions related to OCI.

- Take care when we are considering the hiring of former government employees or military officers, as we must follow “revolving door” laws that may restrict the roles and responsibilities that former government employees perform on our behalf after joining the company. Consult with In-House Counsel if you have any questions on this topic. In addition, Amentum must not discuss employment opportunities with any current military or government employee without involving Human Resources or In-House Counsel.
- Remember that prompt and full disclosure is required anytime you suspect you may have a conflict of interest. Unless and until you receive advance written approval from In-House Counsel, never engage in any conduct that may constitute a possible or perceived conflict of interest.

An organizational conflict of interest occurs when ...

We are in a situation where we could be biased, our objectivity is impaired, or we cannot provide impartial assistance or advice. We should exercise common sense, good judgment, and sound discretion in assessing organizational conflict of interest situations.

— What If?

I am considering working part-time as a design consultant. I mentioned this to one of our current business partners, and she immediately expressed an interest in making use of my services. Do I need to discuss this with anyone?

Yes. If you are employed by Amentum, accepting work from a business partner, supplier, or competitor of our company would be a conflict of interest. Before pursuing any opportunities with this business partner, you must first obtain approval in accordance with Amentum policies.

— Find Out More

Conflict of Interest Policy
Preventing Personal Conflicts of Interest on Select Government Contracts Policy
Business Development & Growth Policy
Hiring of Current and Former Government Employees and Other Officials
Revolving Door Conflict of Interest Questionnaire

Gifts, Entertainment and Other Business Courtesies

Amentum treats guidance on gifts, entertainment, and other business courtesies differently with regard to public and private sector customers and business partners. In the public sector, with very limited exceptions, we do not extend gifts and entertainment to any federal, state, local, or foreign official or their employees, including officials or employees of

government-owned entities. In the private sector, accepting or giving occasional gifts, meals, or entertainment is allowed under some circumstances.

We must make sure that anything given or received complies with our policies, our contractual obligations, and the law. We do not receive or accept gifts or entertainment that may reasonably be deemed to affect individual judgment or actions in performance of our company's responsibility. Our customers, suppliers, and the public at large should know that our judgment is not for sale.

— **Do the Right Thing:**

- When considering offering a gift, meal, entertainment, or other business courtesies, act in a manner consistent with our Values, laws, policies and contract requirements.
- Remember that in the government services market, giving or receiving gifts falls under great scrutiny, on both contractor and customer sides. Even a simple, seemingly innocent action in offering a gift can violate our policies and the law — as well as the policies of our customer. Make sure you review and understand our policies and obtain the necessary approvals before offering anything of any value to a public official.

— **What If?**

I am working closely with a government employee on a contract. Next week, I will be traveling to his office to update him on the project and discuss next steps. I would like to go to lunch with him while I am visiting, as a business courtesy, but I know that Amentum has submitted a bid for another project and this government employee is one of the officials evaluating the bid. What should I do?

The rules governing the types of gifts and entertainment that we can offer government employees are much stricter than those governing our interactions with commercial contracts. Since the government employee is involved in evaluating a bid from Amentum, going to lunch with him could raise questions under anticorruption laws. You should check with the Amentum policy and obtain prior approvals prior to the lunch.

— **Find Out More**

Anti-Bribery Policy
Gifts, Entertainment, and Other Business Courtesies Policy

We avoid even the appearance of something improper.

Never offer, provide, or accept a gift, a meal, or entertainment if it:

- Is counter to our policies or is illegal under any applicable laws or regulations
- Could be viewed as a bribe, kickback, or reward for preferential treatment
- Is being offered in exchange for some action or decision in return
- Is meant to influence a business deal
- Creates an obligation

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 internal and external investigations. If you receive an inquiry, request, or visit from a government official or agency, promptly notify In-House Counsel for guidance.

— Do the Right Thing:

- Be cooperative and forthright in dealings with auditors or investigators (whether internal or external) — 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 the Internal Audit Team for the first time since it was acquired a year ago. The auditors reviewed expense report reimbursements and petty cash processes and have asked a lot of questions about some of the payments. Should I cooperate with the auditors?

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 non-public and material information about Amentum, a vendor, subcontractor, teaming partner, or another third party. Knowing this information can make us “insiders,” and using this information to buy or sell stock or options can be considered “insider trading.” Passing along this information to someone else so that they may trade (a practice called “tipping”) can also be a violation of insider trading rules. We must not trade on the basis of such inside information until the information has been broadly disseminated and assimilated by the general public.

— Do the Right Thing:

- Do not buy or sell securities of any company when you have material nonpublic information about that company.
- Protect material, nonpublic information from the general public, including information in both electronic form and in paper copy.
- Be cautious about requests from friends or family for information about Amentum or companies that we do business with or have confidential information about — even casual conversations could be viewed as illegal “tipping” of inside information.
- Discuss any questions or concerns about insider trading with In-House Counsel.

— Find Out More

Insider Trading Policy

For information to be considered “inside information,” it must be both:

- Material (meaning that it could affect the decisions of a reasonable investor)
- Non-public (meaning that it has not been released to the public)

Examples include the following when such news has not been publicly disclosed: projections of future earnings or losses; news of a pending or proposed merger; news of a significant sale of assets; a declaration of a stock split or offering of additional securities; changes in executive management; significant new contract awards, products or discoveries.

Fair Competition

Because Amentum competes based on the quality of our products and services, we are committed to always promoting fair competition. 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.
 - o Refusing to do business with particular third parties.
- In gathering information about our competitors, observe the highest ethical standards, use publicly available information and:
 - o Never engage in fraud, misrepresentation, deception, or invasive technology to obtain information.
 - o Be careful when accepting information from third parties — you should know and trust their sources and be sure that the knowledge they provide is not protected by trade secret laws, nondisclosure, or confidentiality agreements.
 - o Never pressure anyone to breach a confidentiality agreement, such as by asking a co-worker to reveal confidential information about a previous employer.
- If confidential information about a competitor is deliberately or inadvertently disclosed to you, you must immediately notify In-House Counsel.

— What If?

I am working on a proposal, and the customer sent me a supporting spreadsheet. When opening the file, I find that competitor proprietary pricing information is included in it. Is it OK for me to take advantage of this information since the customer provided it and adjust our proposal to be better positioned to win?

No. We look to gain competitive advantage through superior performance, price, and quality, not by capitalizing on inadvertent disclosures of proprietary information from customers or third parties. We compete vigorously to be an industry leader, maintaining high standards of fairness and honesty. In this case, close the spreadsheet file, do not distribute it further, and immediately contact In-House Counsel in order to promptly and properly disclose the error to the customer or third party.

— Find Out More

Business Development & Growth Policy

Anticorruption and Bribery

Amentum is proud of the work we do throughout the world. We believe that our ability to foster good working relationships with companies, communities, and governments around the world depends on acting ethically in all our business dealings. This means we never give, offer, or accept improper payments in any form.

— 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) prohibit making facilitating payments.

A bribe is ...

Anything of value given in an attempt to influence an individual’s actions or decisions, obtain or retain business, or acquire any sort of improper advantage. It can take the form of:

- A loan
- A discount
- An offer of entertainment or travel
- A charitable contribution
- An internship or job offer

— What If?

I was given authorization to hire a consultant to acquire all the necessary permits Amentum needs from a foreign government to start a new project. The consultant I am thinking of engaging requires a \$25,000 retainer and says that the funds will be used to “speed up the process.” I feel uncomfortable about this retainer — what should I do?

When you find yourself in a situation in which you are unsure how to act, seek assistance. Consult with your supervisor, another member of management, or In-House Counsel to determine if the retainer is being used for a legitimate business purpose.

— Find Out More

Anti-Bribery Policy

Preventing Money Laundering

Amentum is committed to helping in the global fight against money laundering. To keep our company from becoming inadvertently involved in this type of misconduct, we should always perform due diligence on customers, suppliers, intermediaries, and other business partners who wish to conduct business with our company.

Money laundering is ...

The process by which a person or group tries to conceal illegal funds or attempts to make the sources of their illicit funds look legitimate.

— Do the Right Thing:

- Look out for “red flags” that may signal money laundering activities. For example, make sure that the party with whom you are conducting business maintains a physical presence, is engaged in legitimate business, and has proper compliance processes in place.
- Contact In-House Counsel if you need more information about how to identify money laundering.

International Work

Amentum conducts business globally. Export control laws, sanctions, and trade regulations are designed to prevent sensitive products, services, technology, and technical data from being transferred or used in ways that could threaten national security, support prohibited activities, or violate international obligations. Accordingly, we must strictly comply with all applicable laws and regulations governing international business, including those of the United States and jurisdictions in which we operate. 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) the Export Administration Regulations (EAR), the Assistance to Foreign Atomic Energy Activities Regulations in 10 CFR Part 810, and other regulations of the U.S. or other countries that may apply. Any violation of these laws, whether intentional or inadvertent, can result in severe legal, financial, operational, and reputational consequences for both the company and the individual.

— Do the Right Thing:

- If your job involves the movement of products, services, software 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 local 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.
 - o Not send potentially controlled items out of your home country without confirming any export licensing or authorization requirements are met.
 - o Screen suppliers and vendors following our due diligence screening instruction to ensure we comply with global 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 can be seen as participating in an illegal boycott.
 - o Obtain appropriate approval for international travel. Traveling outside your home country involves additional obligations and responsibilities on the part of each employee to minimize stress, stay safe and protected, and ensure the company complies with regulations associated with the export of controlled technical data or equipment, which may be contained in or accessed through your laptop or other electronic devices.
- If you receive a boycott request or have any questions about boycott activities, notify the International Trade Compliance Department.
- Immediately report any potential non-compliance with International Trade Compliance laws and regulations to the International Trade Compliance Department.

— Find Out More

International Trade Compliance Policy
Export Compliance Manual
Import Compliance Manual
Due Diligence Screening Instruction
Foreign National Visitor Assignment Instruction

An export occurs when ...

A product, service, software/technology, or piece of information is shipped, transferred or sent to a person in another country.

In certain jurisdictions, including the United States, Australia, and Japan, an export can also occur when technology, technical information, or software is disclosed to a foreign person or non-resident, regardless of location or means of disclosure. This is known as a “deemed” export.

Certain military or weapons of mass destruction (WMD) end uses may prohibit the export of any item, whether or not it is otherwise controlled.

The export of technical data can occur through meetings, telephone or video conferences, facility visits, and written communications including memoranda, letters, faxes, email, and other written materials.

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.

Helpful Resources

If you find yourself in a situation in which you are unsure how to act, believe that a violation of the Code has occurred, or you just need more information, speak up! Please seek assistance as we understand the importance of asking questions or raising concerns. There are a number of resources that you can use to report or resolve an issue, listed below:

- Your supervisor, supervisor's manager, or any higher-level manager
- Your Human Resources representative or the Human Resources Department
- Amentum In-House Counsel or any member of the Legal Department
- Amentum Ethics and Compliance Office
- The Amentum Ethics Hotline via:
 - o Visit <https://amentum.ethicspoint.com>
 - o Call 1-844-950-1964 (within the U.S. and Canada)
 - o Call the country-specific numbers listed on the ethics posters at your locations; foreign language translations are also provided at locations.

Please refer to the Ethics Hotline poster in your office for the number in your country or go to the OneJavelin intranet site for a copy of the Ethics Hotline posters. The hotline toll-free number is staffed by a third-party company operating 24 hours a day, seven days a week with worldwide language capability.

All reports are reviewed promptly, thoroughly, and consistent with applicable law. Investigations are kept confidential to the extent possible. If necessary, Amentum may report certain investigations to the appropriate authorities.

In addition, employees are hereby notified of the employee whistleblower rights and protections under 10 U.S.C. 2409, "Contractor employees: protection from reprisal for disclosure of certain information," as described in DFARS 203.9, Whistleblower Protections for Contractor Employees. Whistleblower protection laws generally cover a broad range of protected disclosures, including providing information to a supervisor or government agency that the whistleblower reasonably believes shows:

- a violation of law, rule, or regulation;
- gross mismanagement;
- gross waste of funds;
- an abuse of authority; or
- a substantial and specific danger to public health or safety.

If you wish to do so, you may raise your concerns to the relevant government agency Office of the Inspector General, such as 800-424-9098 for the Department of Defense.