



CODE OF CONDUCT

We Have Unwavering Integrity



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A Message from our Chief Executive Officer



At Amentum, we have a reputation that has been built over the last century in providing outstanding performance to our customers, including 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.

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 Core Values and compliance 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.

Sincerely,

John Heller
Chief Executive Officer

Amentum's Vision-Mission-Values



Vision

Create a safer, smarter, cleaner world.



Mission

We develop, engineer and implement solutions to modernize tomorrow's missions.

Values

• We Have Fierce Commitment

We deliver on our promises and are accountable to our teams, customers, company, and communities. We are purpose-driven. No matter the challenge, we work safely with mission success the only acceptable outcome.

• We Create Trailblazing Solutions

We innovate as a team of curious and inventive doers passionate about making a difference in an ever-changing world.

• We Have Unwavering Integrity

We act ethically, and we expect everyone on our extended team to act honorably. We do the right thing—always.

• We Embrace Inclusion and Collaboration

We respect each other, build trust, welcome ideas, communicate effectively with all our teams, and believe strongly in developing and recognizing our people.

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Introduction

Inspiring Integrity in All We Do

One Amentum, One Code

Complying with Laws and Regulations

Asking Questions and Reporting Concerns

Our Commitment to Non-Retaliation



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 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 of our PPI are on the Amentum intranet — branded as “Javelin.” In addition to our Code and the PPI, Amentum has other resources available to help. These resources are listed 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 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. You may also visit Javelin for links to Amentum’s policies, procedures, processes, and guidelines.

One Amentum, One Code

Our Code applies to all Amentum employees, officers, and directors, including those of our wholly owned subsidiaries.

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 Core 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 Core 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 in a timely manner.
- 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.



One Amentum, One Code continued

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.
- 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 them feel comfortable in sharing their concerns.
- Be proactive in preventing and detecting violations of our Code, company policies, or the law, and immediately reporting violations to your supervisor, Human Resources, Ethics & Compliance, or In-House Counsel.
- Ensure training is completed in a timely manner by all employees.
- Consider an employee's commitment to ethical conduct during the performance evaluation process.
- Make sure that our vendors and suppliers have a satisfactory 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 and Regulations

While we comply with all laws and regulations in the United States, Amentum is a worldwide company with operations in numerous countries and territories. Laws differ among the various locations where we conduct business, but we understand our obligation to know and follow the laws 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, 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 Procedure, which sets out requirements for management review and serves as the basis for our authority to act on behalf of the company. The Approval Matrix and Delegation of Authorities Procedure is available on the Amentum intranet.



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 corrective action if necessary. Our speak-up culture also promotes an atmosphere where people feel comfortable asking questions and working toward solutions.

Amentum treats all reports confidentially to the extent we are able to, consistent with company policy, the law, and the requirements associated with a thorough investigation. Suspected violations may even be reported anonymously, where allowed by local law.



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's Ethics and Compliance Office

- The Amentum Ethics Hotline via:



Visit:

<https://amentum.ethicspoint.com>



Call:

1-844-950-1964 (within the U.S. and Canada)

Or call the country-specific numbers listed on the ethics posters at your locations

Please refer to the Ethics Hotline poster in your office for the number in your country or go to the Javelin intranet site to the "Quick Links" box for reporting. 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.

When you contact the hotline, an interview specialist or detailed webform documents your concerns and relays them to the appropriate party within Amentum. We investigate all reports 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.

Our Commitment to Non-Retaliation

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

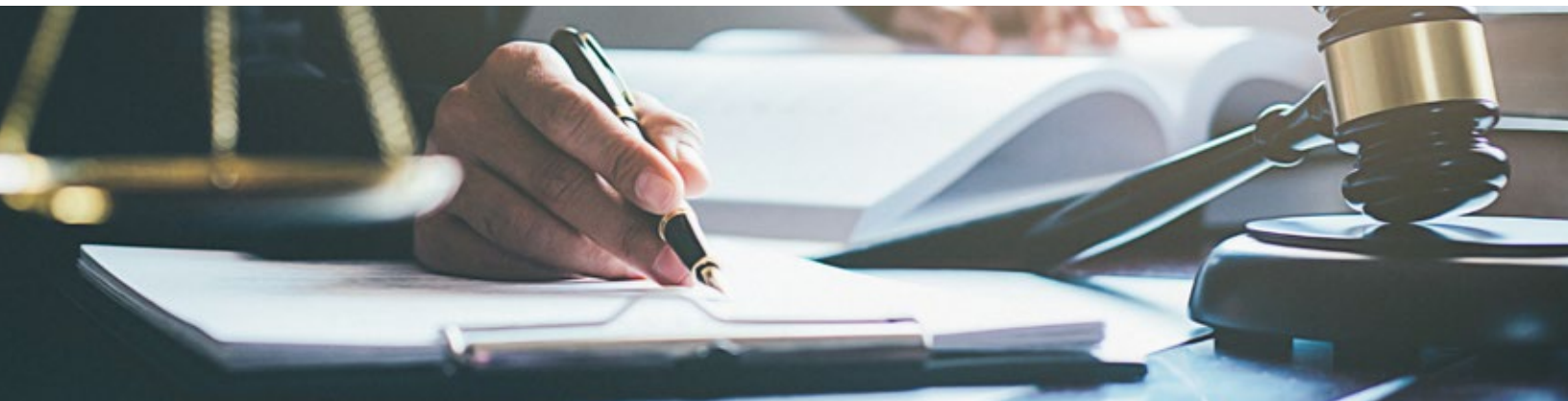
Simply stated, it does not matter whether your report actually uncovers unethical behavior, as long as you have honest intentions in making it. Many countries have enacted legislation to protect those who report misconduct. Amentum enforces any applicable protections afforded by these kinds of laws.

Amentum wants employees to feel comfortable reporting suspected misconduct 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 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, so that Amentum can investigate and resolve the issue. You — and all other Amentum co-workers who make an honest and sincere report of potential misconduct — should come forward without fear, knowing that you will be protected from retaliation.



Promoting a Safe and Respectful Workplace

Environmental, Health, and Safety (EHS)

Diversity, Equal Employment Opportunity, and Non-Discrimination

A Harassment-Free Amentum

Human Rights and Global Employment Standards



Environmental, Health, and Safety (EHS)

Live Safe! We empower our people to always 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, continually 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 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 (MCD) while driving a company vehicle, use a company MCD while driving a personal vehicle, or use a personal MCD while driving a personal 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 manufacturer's 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.

- Maintain good housekeeping at all times, keeping work areas neat, clean, and free of hazards.

- Never participate in horseplay of any kind while on the job or on company premises.

Remain alert at all times.

- Heed all warning signs and posted safety instructions.
- Follow all work area guidelines and regulations for employee and environmental protection.

SafeUp®

Diversity, Equal Employment Opportunity, and Non-Discrimination

Amentum is committed to fostering a workplace where everyone is treated with dignity and respect. We believe our differing backgrounds, experiences, and perspectives reflect our commitment to diversity and position us for growth in the marketplace. We strive to maintain an inclusive work environment and are committed to attracting, developing, retaining, and promoting a diverse and well-qualified workforce. Amentum extends equal employment opportunities to all applicants and prohibits discrimination in the workplace.

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: race, sex, pregnancy, age, ancestry, military or veteran status, color, religion, creed, disability, marital status, medical condition, genetic information, national origin, gender, gender identity, gender expression, sexual orientation, or citizenship

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.

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 diversity and inclusion. 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.



A Harassment-Free Amentum

Maintaining a respectful workplace also means that we never 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 perpetrator involved, harassment is a violation of our Code and company policy and has no place at Amentum.

Harassment is...

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

- Verbal remarks (comments, suggestions, jokes, or requests for sexual favors)
- Inappropriate images (drawings, photographs, or videos)
- Physical behavior (suggestive looks, leering, or unwelcome touching)

Do the Right Thing:

- Promote a positive attitude toward policies designed 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) that may compromise our ability to work together and be productive.

Human Rights and Global Employment Standards

As part of our commitment to our global community, we maintain positive, productive work environments and uphold individual human rights in both our policies and 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

Do the Right Thing:

- Remember that respect for human dignity begins with our daily interactions with each other and with our suppliers and customers.
- 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.

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. We act to prevent these unlawful activities by implementing compliance plans for combating trafficking in persons (CTIPs) and requiring CTIPs training for personnel working outside the U.S.

Protecting Information and Property

Accurate Business Records

Company and Customer Property

Data Privacy

Classified and National Security Information

Speaking on Behalf of Amentum

Political and Charitable Activities



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.

Because it is a crime to knowingly make false statements or false claims to the U.S. government, 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 contracting), in addition to being subject to disciplinary action, up to and including termination.



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 supporting 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. All employees are required to ensure that hours worked are recorded properly. Knowingly mischarging the time that you work or falsifying your time records violates Company policy and possibly the law and will result in disciplinary action up to and including termination. No employee may knowingly charge an incorrect amount or knowingly approve such mischarging. Employees must attend labor timekeeping training upon hire and on an annual basis thereafter.
- Ensure that other costs, such as for materials, services, and travel are appropriately charged to the correct project number to ensure consistent capturing, classification, reporting, and control of financial information.

- Comply with the records management policies and retention schedules that apply to your work and your location. This helps us ensure records are available when needed and preserve documents that may become relevant in audits, investigations, or litigation.
- If you are responsible for any aspect of our financial reporting, make sure you meet all applicable procedural and legal requirements. Take care to ensure 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 your supervisor, another member of management, or any of the resources listed in our Code.



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 actually 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.

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

Company and Customer Property

We have worked hard to acquire our valuable assets, both tangible and intangible. We are responsible for protecting them from loss, damage, misuse, theft, and waste. We can do this by using them wisely and only for 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 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.



Do the Right Thing:

- Take care to avoid improper practices such as:

Borrowing or using Amentum or customer equipment without approval.

Using Amentum or customer resources for personal purposes.

Using Amentum 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 discriminatory or harassing comments or threatening or abusive language.

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.

- Follow our information resources policies and observe good cybersecurity:

Take reasonable steps to protect our information and systems from accidental or unauthorized access.

Use only Amentum-approved hardware, software, applications, and storage devices to access our systems.

Do not download unlicensed or illegal material.

Be vigilant in avoiding phishing, malware, ransomware, and other forms of attack that could put our systems at risk.

Create strong passwords and do not share them with others.

If you become aware of or suspect the inappropriate use of Amentum technologies or electronic communications, notify your supervisor, another member of management, or any of the resources listed in our Code immediately.

Use our company 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.

Company and Customer Property continued

Company Proprietary Information

It is also important to protect our 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 considered proprietary information 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.

- Make sure any third parties have a non-disclosure agreement 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 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.

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

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 competitor proprietary data in any manner.



Data Privacy

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, and we safeguard that data from any unauthorized disclosure. 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 authority.
- Do not disclose personal information to anyone, internally or externally, unless they have a business need for the information.

Personal information includes...

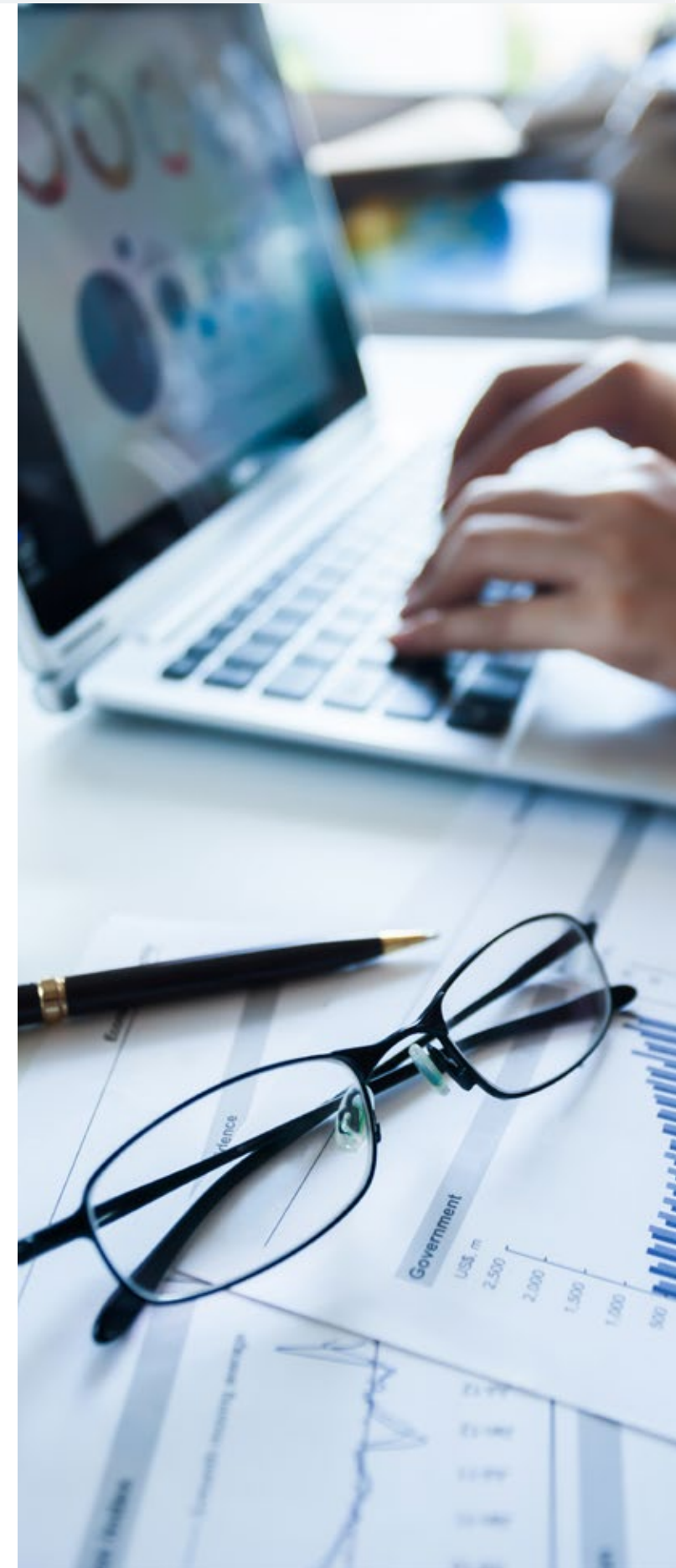
Anything that could be used to identify someone, either directly or indirectly, such as a name, social security number, email address, telephone number, or credit card number.



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.



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 U.S. government.



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. It is never appropriate to disclose this information to another person without explicit approval from the U.S. government.
- 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 Security Services.



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 the External Communications Policy and refer the request to Corporate Communications.
- 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.

Protect Amentum's reputation.

- Make sure our company speaks with one consistent voice.
- Refer outside inquiries to the proper resource.

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, 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 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.



Working with our Customers and Business Partners

Honest and Fair Dealings

Quality Products and Services

Working with the Government

Working with Suppliers

Conflicts of Interest

Gifts and Entertainment



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 business partners 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.



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 or their services or use unfair practices to obtain competitors' confidential information.
- Resist any temptation to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for the decision.

Act with Integrity.

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



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.



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 anticipating 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
- Collaborate for success
- 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 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.



Government contracting requires satisfying our customers by ...

- Ensuring fair and reasonable prices, quality, and timeliness in our deliveries.
- Being responsive and adaptive to customer needs, concerns, and feedback.
- Conducting business with integrity, fairness, and openness.

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 as price, quality, and service — never 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.
- Follow the requirements of our Procurement Manual to compliantly buy the items and services required under 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.

Our suppliers must ...

- Have an organizational culture that encourages ethical conduct.
- Know that we treat all suppliers fairly and impartially.
- Follow the guidance in our “Valued Business Partner” letter provided to every supplier/vendor.



Conflicts of Interest

A conflict of interest can occur whenever a competing interest or activity interferes with our ability to make objective, impartial decisions — these conflicts may be personal (affecting you individually) or organizational (affecting Amentum). Conflicts of interest can undermine the trust that others place in us, so we avoid situations that could lead to even the appearance of one.

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 managed. 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.



Do the Right Thing:

- Be familiar with the types of situations where personal conflicts of interest often arise. Of course, it is not possible to list every scenario that gives rise to a conflict of interest, but the following examples represent common conflict situations you may encounter in your daily work.

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.

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.

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 between our personal interests and those of our company or its customers.

Outside employment (also called Moonlighting) — Employment or consulting with another organization can also create a conflict of interest. In general, you may not accept another job that interferes with your ability to do your work for Amentum. This means you may never conduct outside business during designated work hours or use Amentum's property, equipment, or information for another business. Prior written approval from In-House Counsel and your supervisor is required before performing any outside work.

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.

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.

Conflicts of Interest continued

Serving on a board of directors

— Amentum encourages employees to make a positive difference in their communities. Serving on a board of directors for a non-profit organization is permitted and does not require prior approval, unless it interferes with your ability to do your job. Serving on the board of directors for a company that does (or seeks to do) business with Amentum, however, requires advance approval.

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.

- Avoid Organizational Conflicts of Interest (OCI). These occur when work performed by a contractor on a federal contract may:

Result in an unfair competitive advantage for the contractor.

Impair the contractor's objectivity in performing federal contract work.

- OCI or the appearance of OCI must be avoided at all times, as they can lead to Amentum being excluded from a contract competition, having a contract terminated, or being suspended or debarred from performing 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 (federal, state, or local) employee without involving Human Resources or In-House Counsel.



Conflicts of Interest continued

- Remember that prompt and full disclosure is required anytime you suspect you may have a conflict of interest. In any situation, under any circumstances it is appropriate to seek guidance. 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.

What If?

I am considering part-time work 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. As long as 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 check with your supervisor and In-House Counsel.



Gifts and Entertainment

Amentum treats guidance on gifts and entertainment 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. 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, or entertainment, act in a manner consistent with our Core Values, various laws that govern our actions, and contract requirements.
- Only offer, provide, or accept gifts, meals, or entertainment in accordance with applicable laws and company policy or after consulting with In-House Counsel.
- Remember that in the federal 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.

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 Gifts and Entertainment Policy 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.



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 we can offer government employees are much stricter than those governing our interactions with commercial contacts. 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 In-House Counsel before extending an invitation.

Following the Letter and the Spirit of the Law

Cooperating with Investigations

Insider Trading

Fair Competition

Anticorruption and Bribery

Preventing Money Laundering

International Work



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.

Comply and cooperate with any inspections, investigations, or requests for information.

- Make sure that In-House Counsel is engaged.
- Always tell the truth.
- Ensure all relevant documents are preserved.

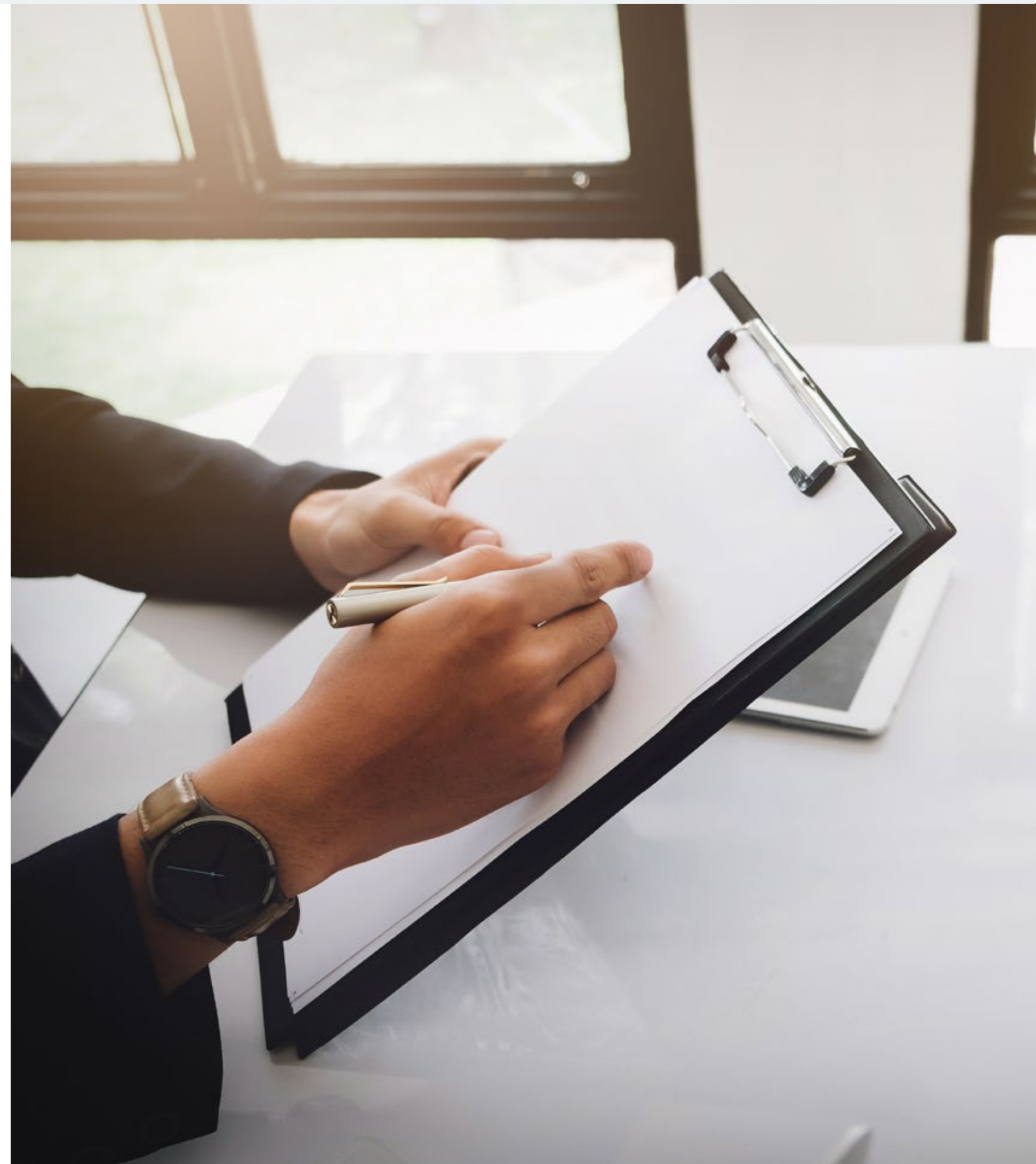
✓ Do the Right Thing:

- 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 sometimes have access to information about our business partners (such as our prime contractors or subcontractors) that is not available to the general public. Knowing this information makes us “insiders,” and using this information to buy or sell stock is called “insider trading.” Passing along this information to someone else so that they may trade (a practice called “tipping”) is also illegal. We must not trade on inside information — doing so would violate our policies, our Code, and the law.



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 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.

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

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

Examples include: 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 products or discoveries.



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:

Prices, terms, or conditions of sale

Dividing or allocating customers, bids, markets, or territories

Refusing to do business with particular third parties

- In gathering information about our competitors, observe the highest ethical standards, use publicly available information and:

Never engage in fraud, misrepresentation, deception, or invasive technology to obtain information.

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, non-disclosure, or confidentiality agreements.

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.

We succeed based on our own merits by ...

- Competing fairly and vigorously.
- Providing truthful information about our services and capabilities.
- Obtaining competitive intelligence the right way.
- Not making disparaging remarks about our competitors.

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.

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 U.S. and other country laws, such as the U.S. Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment, and requires maintenance of accurate books of account, with all company transactions being properly recorded.
- Be on heightened alert when working with government officials. 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.

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 of 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.

Preventing Money Laundering

Amentum is committed to helping in the global fight against money laundering. In order 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.



Do the Right Thing:

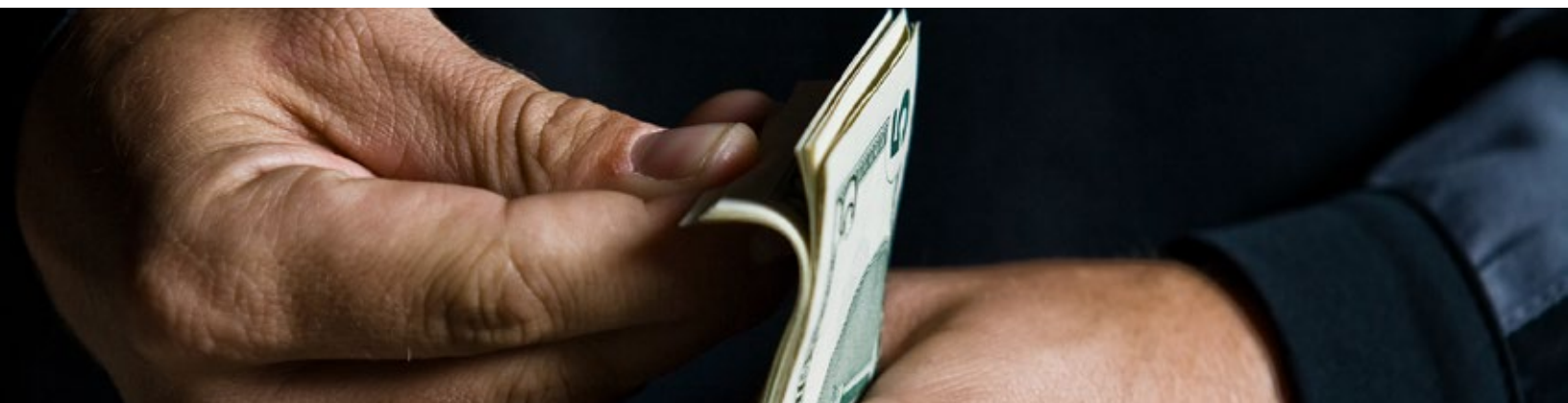
- Look out for “red flags” that may signal money laundering activities. For example, make sure that the party with whom you are conducting business maintains a physical presence, is engaged in legitimate business, and has proper compliance processes in place.
- Contact In-House Counsel if you need more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

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.

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:

Follow our International Trade Compliance procedures that require the involvement of the International Trade Compliance Department.

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.

Screen suppliers and vendors following our due diligence screening instruction to ensure we comply with US sanctions, embargoes, and prohibited activities with certain parties.

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 participating in an illegal boycott.

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 protected U.S. technical data or equipment.

- 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.

An export occurs when...

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

In the United States, an export can also occur when technology, technical information, or software is provided in any way (including verbally, in the case of information) to a non-U.S. person, regardless of where that individual is located.

That means an “export” of technical data can occur during meetings, telephone conversations, and facilities inspections and by 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 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:

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 Services Department

Amentum Ethics and Compliance Office

- The Amentum Ethics Hotline via:



Visit:

<https://amentum.ethicspoint.com>



Call:

1-844-950-1964 (within the U.S. and Canada)

Or call the country-specific numbers listed on the ethics posters at your locations

Please refer to the Ethics Hotline poster in your office for the number in your country or go to the Javelin intranet site to the “Quick Links” box for reporting. 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.

Any report you make will be kept confidential to the fullest extent possible, consistent with the law and good business practices.

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 disclosure, including providing information to a supervisor or government agency that the whistleblower reasonably believes evidences:

- 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.