

## **1. Purpose**

The purpose of this Code of Conduct is to establish ethical standards and behavioral expectations for ACMT employees and business partners. ACMT is committed to conducting business ethically, lawfully, and in accordance with the highest standards of integrity and professionalism. Trust and mutual respect are the foundations of our success.

This commitment supports and protects the safety and reliability of our products, and ensures compliance with customer, regulatory, and legal requirements.

Trust, accountability, and mutual respect are the foundation of our success. All personnel are responsible for supporting a culture that promotes ethical behavior, product safety, regulatory compliance, and respect for others.

## **2. Scope**

This Code of Conduct applies to:

- All ACMT employees
- Contractors and consultants performing work on behalf of ACMT
- Suppliers, subcontractors, and other external providers supporting ACMT operations.

Failure to adhere to these principles may result in disciplinary action or termination of the employee or business relationship.

## **3. Compliance with Laws and Regulations**

ACMT personnel shall comply with all applicable federal, state, and local laws and regulations, as well as customer and contractual requirements.

This includes compliance with laws governing:

- Export, re-export, and retransfer of goods and technical data
- Protection of controlled technical data and intellectual property
- Import regulations and customs compliance
- Economic sanctions and embargoes
- U.S. antiboycott requirements
- Aerospace regulatory requirements

Employees must comply with export control regulations, including:

- International Traffic in Arms Regulations
- Export Administration Regulations

## **4. Compliance with Customer Requirements**

ACMT shall comply with all customer contracts, purchase orders, drawings, specifications, and applicable requirements.

All required manufacturing, inspection, verification, and testing operations must be completed as specified and performed only by trained and authorized personnel. Employees shall promptly communicate any issue that may impact product quality, product safety, regulatory compliance, or delivery commitments.

## **5. Product Safety and Quality Integrity**

ACMT is committed to protecting the safety, reliability, and conformity of its products.

Employees shall:

- Perform work in accordance with approved procedures and technical data
- Maintain accurate and complete quality records

- Maintain product identification and traceability
- Prevent the use of suspect or counterfeit parts
- Report conditions that may compromise product safety or regulatory compliance

Employees are responsible for ensuring that all work is performed in accordance with approved procedures, technical data, and applicable quality requirements. No employee shall knowingly release nonconforming product, falsify quality documentation, or bypass required inspection or verification processes.

## **6. Ethical Business Conduct**

ACMT prohibits engaging in corrupt business practices or fraudulent activity defined as deceit, trickery, dishonest practice, or breach of confidence, intentionally perpetrated for profit or to gain an unfair or dishonest advantage, including but not limited to:

- Acting under false pretenses
- Falsification of information or records, including intentional omission
- Signing for work not performed, including the use of Acceptance Authority Media (AAM)
- False and deliberate misuse of qualified resources or certification/qualification/authorization
- Falsification of time records, reports, or business documents
- Misuse of confidential or proprietary information
- Misrepresentation of qualifications or certifications
- Offering, giving, requesting, or accepting bribes or improper payments
- Accepting gifts or compensation that could improperly influence business decisions
- Personal use of company assets or information for personal gain

Violations may result in disciplinary action up to and including termination. Violations of applicable state and federal laws may result in civil or criminal penalties.

## **7. Conflicts of Interest**

Employees shall avoid or fully disclose conflicts of interest where personal interest may influence the handling of ACMT's business.

## **8. Workplace Respect and Human Rights**

ACMT is committed to maintaining a workplace that promotes dignity, fairness, and respect. The company prohibits:

- Child labor
- Forced or involuntary labor
- Harassment, intimidation, or discrimination

Employees are expected to treat coworkers, customers, and business partners with professionalism and respect.

## **9. Environmental, Health, and Safety Responsibility**

ACMT is committed to providing a safe and healthy work environment and minimizing environmental impact.

Employees shall:

- Follow Environmental, Health, and Safety procedures
- Report unsafe conditions
- Minimize waste, emissions, and energy consumption
- Properly handle hazardous materials and waste

## **10. Protection of Company Assets and Information**

Employees must protect company property and sensitive information, including:

- Physical assets
- Information systems
- Intellectual property
- Confidential technical data
- Customer proprietary information

Company systems and assets must only be used for legitimate business purposes.

## **11. Fair Competition**

ACMT supports fair and open competition and complies with all applicable antitrust laws.

Employees shall not engage in:

- Price fixing
- Market allocation
- Bid rigging
- Sharing confidential competitive information with competitors

## **12. Supplier and Business Partner Expectations**

ACMT expects suppliers and business partners to operate ethically and comply with applicable laws and contractual requirements.

Suppliers shall support:

- Product safety
- Quality and regulatory compliance
- Ethical business conduct
- Prevention of counterfeit or suspect counterfeit parts

Suppliers shall maintain controls to ensure materials and components are obtained from approved and reliable sources.

## **13. Reporting Misconduct**

Employees are responsible for reporting suspected violations of this Code of Conduct, company policy, or applicable laws.

Reports may be made to:

- Supervisors
- Management
- Human Resources
- Compliance personnel

ACMT maintains an open reporting structure that prohibits retaliation against individuals who report concerns in good faith.

## **14. Cooperation with Investigations**

Employees and business partners are expected to fully cooperate with internal investigations, audits, and regulatory inquiries related to potential violations of company policy, customer requirements, or applicable laws.

## **15. Monitoring and Enforcement**

ACMT conducts internal audits and reviews to verify compliance with company procedures, customer requirements, and regulatory obligations.

Violations will be investigated and addressed through appropriate corrective actions. Where required, violations may be reported to customers or regulatory authorities.

**16. Questions**

Employees who have questions regarding this Code of Conduct should contact management or Human Resources for guidance. All personnel are responsible for understanding and complying with the principles outlined in this Code of Conduct.

**17. Employee Awareness and Responsibility**

ACMT ensures that employees are aware of the expectations defined in this Code of Conduct as part of onboarding, training, and ongoing organizational communications.

Employees are responsible for understanding how their work contributes to product conformity, product safety, regulatory compliance, and ethical business conduct.

| Rev. Level | Summary of Changes                                                                                                                                              | Changed By       | Checked By  | Date      |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------|-----------|
| C          | <ul style="list-style-type: none"><li>Addition of Revision Table</li><li>Incorporation of policy covering Nadcap requirements for fraudulent activity</li></ul> | Jarrad McGlamery | John Uliano | 6/11/2024 |
| D          | <ul style="list-style-type: none"><li>Full rewrite</li></ul>                                                                                                    | Jarrad McGlamery | John Uliano | 9/4/2026  |