

## Code of Conduct

ACMT is committed to conducting our business ethically and to the highest business standards. Our commitment to the highest standards helps us build innovative products and exceed customer expectations. Trust and mutual respect are the foundation of our success, and we must continually strive to keep those relationships intact. Each of us is personally responsible for following ACMT's Code of Conduct.

The following items highlight what ACMT expects of its employees regarding the Code of Conduct:

- Maintain strict compliance with all laws, regulations, and customer requirements. This includes applicable export, re-export, and retransfer of goods, safeguarding technical data, software, and services; import of goods; economic sanctions and embargoes; and US antiboycott requirements.
- Compliance with customer contracts regarding Purchase Orders/Sales Agreements, drawings, and customer requirements. All required manufacturing, inspection, and testing operations must be completed properly by trained individuals.
- Timely communication and prompt response to matters, events, etc. that may adversely impact our customers, other employees, and the company.
- Assure a safe and healthy working environment by complying with EHS standards. Operate in a manner that minimizes waste, emissions, energy consumption, and the use of any materials of concern.
- Prohibit the use of child or forced labor.
- Avoidance or full disclosure of potential conflicts of interest or the appearance of a conflict of interest. A conflict of interest generally describes situations where an employee's interests may influence their handling of ACMT business.

- Prohibit engagement 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. This includes but is not limited to:
  - Acting under false pretenses.
  - Falsification of information or intentional omission, such as falsification of records including the use of Acceptance Authority Media (AAM), not signing for work performed, reports, timecards, benefit claims, or business-related documents.
  - False and deliberate misuse of qualified resources or certification/qualification/authorization.
  - Misuse of confidential information.
  - Involvement in offering or paying a bribe.
  - Seeking or accepting gifts or any form of compensation from suppliers, customers or others doing business or seeking to do business with ACMT.
  - Personal use of company assets for personal gain.

Fraudulent activity violates Company policy and will result in disciplinary action, up to and including immediate termination. Violations of applicable state or federal laws may be punishable by imprisonment, fine, or both.

ACMT's internal audit process is in place to ensure our organization is meeting internal, customer, and regulatory requirements. Any fraudulent activity discovered shall be investigated and disclosed to customers and external bodies, as applicable. If you become aware of misconduct related to ACMT employees or any employees of our business partners, we expect you to promptly notify ACMT. You may contact ACMT anonymously by speaking with Human Resources.

If you have any questions about this Code of Conduct, please contact Human Resources.

<b>Rev. Level</b>	<b>Summary of Changes</b>	<b>Changed By</b>	<b>Checked By</b>	<b>Date</b>
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