

Supplier Code of Ethics

Atlas Technologies, Inc. (Atlas Tech) is committed to upholding the highest standards of integrity, quality, and ethics in all our business activities. Our suppliers, their products, personnel, and services are a natural extension of Atlas Tech's own resources. Atlas Tech's suppliers and consultants are responsible for ensuring that their conduct, as well as the conduct of those they report to, complies with all aspects of the Atlas Tech Supplier Code of Ethics. The terms and conditions herein are in addition to, and are not intended to conflict with or modify, the terms and conditions of any subcontract, purchase order, or other applicable agreement.

Compliance with Law

As a contractor to the U.S. Government, Atlas Tech expects our suppliers to maintain full compliance with the laws and regulations of the United States, all localities, and states applicable to their business.

Complete and Accurate Records

Suppliers will create and maintain accurate records to include communications, books, accounts, contracts, and financial information relating to Atlas Tech accurately and honestly, and in accordance with standards that follow Generally Accepted Accounting Principles (GAAP) and contractual requirements.

Human Rights

Suppliers shall ensure that illegal child labor is not used in the performance of work. Suppliers shall comply with applicable regulations prohibiting human trafficking including FAR 22.17.

Employment Practices

Suppliers shall ensure their employees are afforded an employment environment free from ethnic, racial, religious, sexual, or any other type of harassment. Atlas Tech expects our suppliers to provide equal employment opportunity to its employees and applicants for employment.

Gifts and Kickbacks

All business dealings, including the marketing and sale of products and services, should be without the perception that favorable treatment was sought, received, or provided in exchange for gifts or kickbacks. As such, suppliers shall fully comply with the anti-corruption laws, directives, and regulations that govern operations in the countries in which they do business, including without limitation, the US Foreign Corrupt Practices Act and the Anti-Kickback Act of 1986 (41 U.S.C. 51-58) which prohibits offering, providing, attempting to provide, soliciting, or accepting kickbacks in connection with U.S. Government contracts or subcontracts.

Suppliers may not offer or accept, directly or indirectly, any gift in any Atlas Tech business dealings. For these purposes, a "gift" is defined as anything of monetary value including such things as cash, meals, event tickets, transportation, local travel, and lodging, whether provided in-kind, by purchase, payment in advance, or reimbursement. Government regulations provide a few very limited exceptions to the rule, such as:

- gifts valued at \$20 or less (if the total value to the same person is not more than \$50 per year),

- gifts motivated solely by family relationships, and
- modest refreshments (such as coffee and pastries).

Reciprocity

Reciprocity will not be considered as a factor whenever Atlas Tech selects suppliers. Each procurement decision is awarded solely based on quality, delivery, service, and price, and not on the promise of future business or the recognition of past business during the selection process.

Conflict of Interest

Atlas Tech recognizes its mission, as well as the unique role that it plays in client acquisition and technology evaluation programs. Due to the knowledge gained of a client's intent and subsequent expenditures, all Suppliers involved in any aspect of these programs are required to conduct their assignments in a completely independent and objective fashion that is consistent with the interests of both the client and Atlas Tech. Any situation that creates or appears to create corporate or personal conflicts of interest, the abuse of privileged information, or any other unfair dealing practice must be avoided.

Export/Import Controls

Suppliers are expected to ensure their business practices are in accordance with all applicable laws, regulations, and directives governing the import or export of parts, components, and technical data.

Quality

Suppliers must develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Suppliers will promptly notify Atlas Tech of counterfeit parts when appropriate.

Violations and Compliance

Violations of the above policy should be reported to Atlas Tech Procurement immediately at procurement@atlas-tech.com. In certain contractual flow down situations, subcontractors may be required to maintain codes of business ethics and to display fraud hotline posters and create electronic versions on their company websites when receiving federal subcontracts over \$5,000,000 (Federal Acquisition Regulation (FAR) 52.203-14). When receiving Department of Defense (DoD) subcontract funds, use of the DoD Hotline Poster may be required (Defense FAR Supplement 252.203-14).