



CODE OF CONDUCT EMPLOYEE

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ABOUT ATLANTIC TRACK

Atlantic Track is an employee-owned company that is dedicated to delivering value to and creating long-lasting relationships with our customers. We have the experience, manufacturing capability, quality assurance, and inventory to build and maintain all track infrastructures.

We strive for continuous improvement across all disciplines through lean manufacturing methodology. These principles, when practiced daily, allow us to reduce operating costs by increasing efficiency. We are also committed to achieving the highest safety and sustainability standards in the industry. Our manufacturing facilities adhere to strict guidelines that reduce not only risk, but our carbon footprint as well.

The diversity of Atlantic Track's employees contributes to our collective success. The company is committed to the principle of equal opportunity pursuant to Title VII of the 1964 Civil Rights Act as amended by the Equal Opportunity Act of 1972. Under no circumstances will the company discriminate on this basis on race, color, ancestry, religion, sex, national origin, sexual orientation, age, citizenship, marital status, disability, gender identity, or veteran status.

Atlantic Track's people are our most important asset. We care about the safety and health of our employee-owners and the communities in which we operate and live. Our workforce readiness, development, and training efforts, paired with exceptional benefits, HR, and family-first initiatives, are key to attracting and retaining top talent. We are proud to offer our employee-owners stable and rewarding careers in a dynamic work environment.




Atlantic Track is committed to conducting business in a responsible, ethical, and sustainable way

OUR CODE OF CONDUCT

Atlantic Track is committed to conducting business in a responsible, ethical, and sustainable way, and we require the same commitment from our employee-owners. To that end, we have established values, which are a set of beliefs that govern our actions. These values set the expectation for having respect for each other and our planet, integrity in our operations and actions, inclusiveness and excellence in our work, and a deep passion for our customers' success.

Atlantic Track's Code of Conduct brings our values to life, identifying the behaviors we expect from our employee-owners.

The Code of Conduct is where we find direction to guide our interactions with each other, our customers, the communities in which we operate, and all other stakeholders. It is our guide when we face an ethical dilemma, and it serves as a compass that leads us to the proper contact when we have questions or concerns.

 Atlantic Track's Code of Conduct applies to all employee-owners. Employee-owners are encouraged to engage in constructive dialogue with Atlantic Track's leadership regarding the Code of Conduct.

OUR VALUES

Respect

- We show trust and respect for each other
- We care for people and the environment
- We work safely or not at all, and we address unsafe actions
- We support health and well-being
- We promote green solutions and conduct environmentally friendly operations
- We are accountable to future generations

Excellence

- We always strive to be better in everything we do
- We take pride in quality and innovation

Integrity

- We conduct business with integrity and transparency
- We live by our Code of Conduct and refuse to take shortcuts

Teamwork

- We build one Atlantic Track team together with customers, partners, and communities
- We are a learning organization and generously share our expertise
- We cultivate an atmosphere in which everyone can speak their mind
- We leverage diversity to deliver the best solutions
- We foster an inclusive culture that is open and fair

Customer Success

- We help our customers succeed
- We strive to understand our customers' needs-and their customers' needs
- We help our customers turn their visions into reality

Conducting business in a responsible, ethical, and sustainable way.



USAGE GUIDE

Compliance

You are required to comply with all applicable laws and with our Code of Conduct, including when our Code of Conduct sets a higher standard than, but does not conflict with, legal requirements. Customs or local practices never take precedence over legal requirements. If you find that our Code of Conduct is in conflict with applicable legal requirements, you should inform the appropriate Atlantic Track manager.

Reporting Misconduct

Atlantic Track believes that a strong culture of ethics depends in part on creating an environment in which employees feel free to report instances of noncompliance with our Code of Conduct. Such noncompliance might include suspected illegal or unethical conduct (collectively called misconduct). We are committed to investigating reports of suspected or known misconduct and to taking appropriate action based on our findings. Moreover, employees are obligated to report suspected or known misconduct to Atlantic Track. Suspected or known misconduct should be reported by speaking with the appropriate Atlantic Track manager or to Human Resources.

Retaliation

We do not retaliate against anyone for submitting in good faith a report of suspected or known misconduct. Similarly, you must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct. “Good faith” means that to the best of a person’s knowledge and belief, everything reported is true and that everything known is reported. Any employee who engages in retaliation will be subject to disciplinary action. If you believe that you have experienced retaliation, you should report it as suspected misconduct.

Auditing

Atlantic Track reserves the right to monitor and audit each employee’s compliance with the Code of Conduct. Accordingly, employees must cooperate by providing relevant information in response to Atlantic Track requests and by making individuals accessible so Atlantic Track can conduct a meaningful audit.

Health, Safety, and Well-Being

Atlantic Track cares for our people and the people affected by our workplaces, and we continuously strive to develop a work environment that promotes health, safety, and well-being. We aim to lead our industry in health and safety performance, with continuous, measurable improvements toward our goal of an injury-free environment. We promote and share personal safety and accident prevention best practices.

FOR EMPLOYEES THIS MEANS:

- *You have the right to a safe, secure workplace.*
- *You take personal responsibility for helping to ensure a safe, healthy work environment.*
- *You care for the health of your colleagues and report all workplace incidents and any unsafe or unhealthy work conditions to your manager or local safety manager.*
- *You do not ignore any work activity you believe is unsafe or unhealthy. You have the authority and responsibility to stop any activity (including your own) that you believe is not being conducted in a safe, healthy manner.*
- *Regardless of your role, you can contribute to a safe workplace by demonstrating active and visible leadership in health and safety matters.*
- *Any safety concerns should be immediately reported to your manager or someone in authority on site.*

Fair Working Conditions

Atlantic Track supports recognized global human rights and fair working conditions for persons working on our projects, in our workplaces, and in our supply chain.

FOR EMPLOYEES THIS MEANS:

- *You ensure that working conditions, hours, wages, and benefits comply with applicable national and local laws and relevant ILO conventions.*
- *You have zero tolerance for any form of human trafficking or child forced or compulsory labor, including such practices as the unlawful or illegitimate withholding of wages. A child is anyone below the age of fifteen (15), or below any higher minimum age specified by local law.*
- *You do not allow any practice that would restrict the free movement of employees. Such practices can include requiring that employees hand over identification documents, passports, or work permits as a condition of employment.*
- *You recognize and respect employees' right to freedom of association and collective bargaining, where permissible by law.*

Discrimination and Harassment

We respect all individuals and strive to work as one team to foster open, straightforward, and respectful communication. We provide equal treatment and employment opportunities, and we do not tolerate any form of harassment or discrimination.

FOR EMPLOYEES THIS MEANS:

- *You do not tolerate disrespectful behavior, bullying, discrimination, harassment, or unwanted sexual advances.*
- *You do not discriminate.*
- *You provide equal treatment and opportunities for employees and job applicants. You embrace and promote an inclusive culture.*

Environment

Atlantic Track is committed to protecting the environment and believes that we can make major contributions to a more sustainable world. We actively work to improve the environmental performance of our operations, projects, products, and services throughout their entire life cycles.

FOR EMPLOYEES THIS MEANS:

- *You conduct your operations in an environmentally responsible manner and in accordance with applicable environmental laws as well as those set forth by Atlantic Track.*

Confidentiality

We respect confidential information relating to Atlantic Track and our stakeholders, and take all reasonable measures to prevent confidential information from being disclosed to any person who does not need or have a right to that information in the course of their work.

FOR EMPLOYEES THIS MEANS:

- *You ensure the protection of confidential information entrusted to you by Atlantic Track, our customers, and our stakeholders.*
- *You do not act on confidential information received in error, whether it has come from Atlantic Track, our customers, or others. You contact the sender and disclose the situation to Atlantic Track.*

You are required to comply with all applicable laws and with our Code of Conduct.

Data Protection

We respect everyone's right to the protection of their personal data and the right to their integrity in connection with processing of personal data. The definition of personal data, and the legal requirements for safeguarding it, varies by country. It could include a person's name(s), personal healthcare information, photographs, or identity numbers.

FOR EMPLOYEES THIS MEANS:

- *You ensure that all uses of personal data (collection, registration, comparison, storage, and deletion, or a combination of these) take place in accordance with applicable laws and regulations.*
- *You always act respectfully and consider the privacy of others. You only access personal data if authorized to do so and only to the extent necessary for your job responsibilities.*
- *If you have permission to access personal data, you protect and keep the information confidential.*
- *You only grant others access to personal data on a need-to-know basis, with appropriate authorization and according to legal requirements.*

Fair Competition

We are committed to fair competition and do not tolerate any violation of antitrust laws, competition laws, or related regulations. We believe fair competition benefits Atlantic Track, our stakeholders, and society as it drives efficiency and innovation, which are the basis of a well-functioning market economy.

FOR EMPLOYEES THIS MEANS:

- *You practice fair competition.*
- *You do not participate in bid-rigging by way of bid suppression, complementary or cover bidding, bid rotation, or other mechanisms that limit fair competition in tender situations.*
- *You do not participate in any other form of cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.*

Conflict of Interest

When acting as a representative of an employer or other party, we are each responsible for making decisions in the best interest of that employer or party without regard for personal gain. Conflicts of interest can be rooted in hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships, and close personal relationships. Atlantic Track strives to operate in a manner in which conflicts of interest are actively avoided, and we require our supply chain to do the same.

FOR EMPLOYEES THIS MEANS:

- *You avoid situations that may present a conflict of interest or appear to do so.*
- *You notify the relevant Atlantic Track manager if you become aware of an actual or perceived conflict of interest.*

Hospitality and Gifts

We do not request, accept, offer, authorize, or provide hospitality or gifts that might improperly influence or create the appearance of improperly influencing our business decisions or decisions by our customers or others with whom we work. Atlantic Track has established a hospitality and gifts policy that outlines acceptable circumstances and monetary limits for hospitality and gifts.

FOR EMPLOYEES THIS MEANS:

- *You do not offer or accept hospitality or gifts that might improperly influence or create the appearance of improperly influencing your business decisions or those of Atlantic Track, our customers, or others with whom we work.*
- *You respect and observe Atlantic Track's hospitality and gifts policy.*
- *If an Atlantic Track employee requests any type of hospitality, gift, or personal service for free or at less than fair market value, you report it to the relevant manager or Human Resources.*

Sanctions

Sanctions are legal instruments used by governments and multinational bodies to influence foreign policy by prohibiting business dealings with certain countries, individuals, entities, or sectors. The United Nations, the EU, and the United States, among others, maintain sanctions lists. Atlantic Track does not engage, directly or indirectly, with any person or entity listed as prohibited on any sanctions list. We do not conduct business, directly or indirectly, with any country or region subject to sanctions.

FOR EMPLOYEES THIS MEANS:

- *You have knowledge of the external parties and their real (beneficial) owners with whom Atlantic Track conducts business.*
- *You vigilantly watch for external parties who might be on a sanctions list or might have a related company in a country subject to sanctions.*
- *You consult your relevant supervisor, manager, or HR representative if you have questions or concerns regarding sanctions laws and regulations or regarding a specific external party.*

If you, in any way, mention that you are an employee of Atlantic Track while using social media, then you will be held to the responsibilities as a representative of Atlantic Track.



SOCIAL MEDIA POLICY

We recognize the Internet provides unique opportunities to participate in interactive discussions and share information using a wide variety of social media platforms. However, use of social media also presents risks and carries with it certain responsibilities. To minimize risks to Atlantic Track, employees are expected to follow our guidelines for appropriate use of social media. This policy applies to all employees who work for Atlantic Track.

Guidelines

For purposes of this policy, social media includes all means of communicating or posting information or content of any sort on the internet, including to your own or someone else's blog, journal or diary, personal website, social networking or affinity website, web bulletin board or a chat room, whether associated or affiliated with the company, as well as any other form of electronic communication.

Company principles, guidelines, and policies apply to online activities just as they apply to other areas of work. Ultimately, each employee is solely responsible for what is communicated on social media. Employees may be personally responsible for any litigation that may arise from any unlawful defamatory, slanderous, or libelous statements made against any customer, manager, owner, or employee of Atlantic Track.

Know and Follow the Rules

Postings that include unlawful discriminatory remarks, harassment, and threats of violence or other unlawful conduct will not be tolerated and subject to disciplinary action up to and including termination.

Be Respectful

Atlantic Track cannot force or mandate respectful and courteous activity by employees on social media during non-working time. If you decide to post complaints or criticism, avoid using statements, photographs, video, or audio that reasonably could be viewed as unlawful, slanderous, threatening, or that might constitute unlawful harassment. Examples of such conduct might include defamatory or slanderous posts meant to harm someone's reputation or posts that could contribute to a hostile work environment based on race, sex, disability, age, national origin, religion, veteran status, or any other status or class protected by law or company policy. Your personal posts and social media activity should not reflect upon or refer to Atlantic Track.

WHEN POSTING INFORMATION:

- *Maintain the confidentiality of trade secrets, intellectual property, and confidential commercially sensitive information related to the organization.*
- *Do not create a link from your personal blog, website, or other social networking site to a company website that identifies you as speaking on behalf of the company.*
- *Never represent yourself as a spokesperson for the company. If the company is a subject of the content you are creating, do not represent yourself as speaking on behalf of the company. Make it clear in your social media activity that you are speaking on your own behalf.*
- *Respect copyright, trademark, third-party rights, and similar laws and use such protected information in compliance with applicable legal standards.*

Best Practices In and Out of the Workplace:

Do not use social media while on your work time, unless it is work related as authorized by your direct supervisor or consistent with policies that cover equipment owned by the company.

Outside of the workplace, on your personal computer and using your personal e-mail address, with very few exceptions, you have the right to do whatever you like within the confines of the law. However, Atlantic Track considers you responsible for any online activity that is linked to or can be traced to Atlantic Track. When joining and interacting in online social networking, employees should be cognizant of the reputation of Atlantic Track and what information may be referred or traced back to Atlantic Track.

While Atlantic Track takes no position on your decision to join a social network or other online public forum, you are prohibited from accessing social networks, during working hours or on company provided devices unless it relates to or is used to fulfill a function of your position and has supervisory approval.

IF YOU CHOOSE TO MAINTAIN A PROFILE ON A SOCIAL NETWORKING SITE, YOU MAY **NOT**:

- *Use a company e-mail address as means of logging on or into your profile.*
- *Maintain a hyperlink to an Atlantic Track website page.*
- *Disclose proprietary information to anyone, even fellow employees on a social networking site.*

As social networking communications are somewhat informal, it may be easy for an employee to disseminate proprietary information, especially when the employee believes that they are only discussing matters among other employees. However, social networking sites have varying levels of security and are always subject to and vulnerable to security breaches. Therefore, proprietary information is not to be discussed or referred to on such social/professional networking sites, even in private messages between employees who have authorized access to the information while inside Atlantic Track. Your failure to comply with these policies may result in disciplinary action, including termination, unless your job description specifically requires your completion of these tasks essential to your position.

In conclusion, if you, in any way, mention that you are an employee of Atlantic Track while using social media, then you will be held to the responsibilities as a representative of Atlantic Track. Please note that as a representative of Atlantic Track, everything that you post has the potential to reflect positively or negatively on Atlantic Track and its image. You and you alone, take responsibility for representing Atlantic Track in a professional manner.

REPORTING CONCERNS

You can report a concern to the appropriate Atlantic Track manager, Human Resources, or Atlantic Track's counsel at 800-631-1274.

If you wish to report a concern in writing, refer to the Employee Handbook for forms and reporting information.

Contact us to
find out more:

800-631-1274
info@atlanticrack.com

atlanticrack.com