



CODE OF CONDUCT SUPPLIER

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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 suppliers. 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 others and our planet, integrity in operations and actions, inclusiveness and excellence in work, and a deep passion for others' success.

Atlantic Track's Supplier Code of Conduct brings our values to life, identifying the behaviors we expect from our suppliers. The Supplier Code of Conduct is where you will find direction to guide your interactions with Atlantic Track. It is your guide when you face an ethical dilemma, and it will serve as a compass to lead you to the proper contact when you have questions or concerns.

Atlantic Track's Code of Conduct applies to all providers of goods and services and their employees in their work with Atlantic Track. "Suppliers" includes suppliers, subcontractors, professional service providers, consultants, intermediaries, and agents.

 As a supplier, you must ensure that the practices and principles outlined in Atlantic Track's Supplier Code of Conduct flow down throughout your own supply chain. Suppliers are encouraged to engage in constructive dialogue with Atlantic Track's leadership regarding the Supplier Code of Conduct and doing business with Atlantic Track.

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

Suppliers are required to comply with all applicable laws and with the Supplier Code of Conduct, including when the 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 the 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 suppliers feel free to report instances of noncompliance with our Supplier Code of Conduct. Such noncompliance might include suspected illegal or unethical conduct (“misconduct”). We are committed to investigating reports of suspected or known misconduct and to taking appropriate action based on our findings. Suppliers, including their employees and supply chain, are obligated to report suspected or known misconduct to Atlantic Track by speaking with the appropriate Atlantic Track manager or Human Resources.

Retaliation

Atlantic Track does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct. Similarly, suppliers 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 everything known is reported.

Auditing

Atlantic Track reserves the right to monitor and audit each supplier’s compliance with the Code of Conduct. Suppliers 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. Suppliers are also required to evaluate their supply chain to ensure compliance with the Code of Conduct, and to conduct audits of their supply chain when requested by Atlantic Track. Any noncompliance by a supplier or their supply chain must be effectively remediated in a timely manner and at no additional cost to Atlantic Track’s customers or Atlantic Track. Breaches of the Supplier Code of Conduct may negatively impact your business relationship with Atlantic Track.

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 SUPPLIERS THIS MEANS:

- You work together with Atlantic Track and other suppliers to ensure a healthy and safe working environment.
- You ensure that your employees and others in your supply chain are adequately trained and provided with the proper equipment to safely carry out their work.
- You recognize that all employees have a right and an obligation to stop unsafe work.
- You report to Atlantic Track all health and safety incidents related to our project sites and our workplace.

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 SUPPLIERS 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.
- You recognize the special needs of employees under the age of 18, and your duty of care toward them.

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 SUPPLIERS THIS MEANS:

- You do not tolerate disrespectful behavior, bullying, discrimination, harassment, or unwanted sexual advances.
- You do not discriminate, and 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 SUPPLIERS 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's environmental management standards.*

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 SUPPLIERS THIS MEANS:

- *You ensure the protection of confidential information entrusted to you by Atlantic Track, our customers and others.*
- *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.*

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 SUPPLIERS 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.*

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 SUPPLIERS 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 all 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 SUPPLIERS THIS MEANS:

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

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 SUPPLIERS 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 Atlantic Track.*

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 SUPPLIERS THIS MEANS:

- *You respect that Atlantic Track needs to know its external parties, and you are transparent about the real beneficial owners with whom Atlantic Track conducts business.*
- *You respect and observe that Atlantic Track is vigilant in watching for external parties who may be on a sanctions list or who may have a related company in a country subject to sanctions.*
- *You report to Atlantic Track if you have questions or concerns regarding sanctions laws and regulations.*

REPORTING CONCERNS

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

Contact us to
find out more:

800-631-1274
info@atlanticrack.com

atlanticrack.com