

Attalon

Code of Ethics, Supplier Responsibilities, and CMMC Compliance

At Attalon, Inc. and its affiliates (“**Attalon**”), it is each employee’s responsibility to exercise sound business judgment and to act honestly and ethically. We are required not only to “do the job,” but to “do it the right way.” Doing it the right way goes past complying with laws and regulations. It means conducting ourselves with ethics and integrity in all that we do. Our Code of Ethics combines the values and standards of behavior that make Attalon a trusted and respected organization.

We expect the same level of ethics, integrity, and social responsibility from our Suppliers. Suppliers shall implement their own similar written code of conduct and flow down the principles of their code of conduct to the entities that furnish goods and services to the supplier. Working together, we must meet the highest standards of business excellence that our customers expect from us.

The following outlines of Attalon’s expectations associated with each topic and, at the end, you must certify that you will comply with each statement.

1. HUMAN TRAFFICKING

Attalon is opposed to human trafficking and forced labor in any form. We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business. The U.S. Government has a zero-tolerance policy regarding any Government employees and contractor personnel and their supply chains engaging in any form of trafficking in persons, defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of involuntary servitude, bondage or slavery.

Suppliers shall enforce a similar policy internally as well as throughout their supply chain.

2. NON-DISCRIMINATION

Suppliers shall not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, or national origin.

3. CONFLICT MINERALS

Suppliers shall take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

4. ENVIRONMENT

Suppliers shall operate in a manner that actively manages risk, conserves natural resources, and protects the environment.

5. EMPLOYEE SAFETY & HEALTH

Suppliers shall comply with applicable safety and health laws, regulations, policies, and procedures. Suppliers should provide for the health, safety, and welfare of their employees, visitors, and others who may be affected by their activities.

6. HARASSMENT

Suppliers shall ensure that employees may perform their work in an environment free from physical, psychological, and verbal harassment, or other abusive conduct.

7. DRUG-FREE WORKPLACE

Suppliers shall maintain a workplace free from illegal drugs.

8. REPORTING

Suppliers shall give employees access to an adequate avenue of raising issues or concerns without fear of retaliation.

9. GIFTS/BUSINESS COURTESIES

It is our policy to earn our business as a result of our product quality and customer satisfaction. It is therefore not allowed to accept gifts or business courtesies of any nature from our suppliers. We expect our suppliers to have the same type of policy in place.

10. FAIR COMPETITION/ANTI-TRUST

Suppliers shall conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations.

11. CONFLICTS OF INTEREST

Suppliers shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest when supplying products or services.

12. EXPORT/IMPORT CONTROL

The subject of Export/Import control is critical to our customers. Because of this, our suppliers shall ensure that their business practices are in accordance with all applicable laws and regulations governing their export and import of domestic and foreign origin parts and components and related technical data.

13. COUNTERFEIT PARTS

Counterfeit parts are becoming more prominent as the market becomes globalized and violators seek more sophisticated ways to infiltrate. Suppliers shall implement any and all means available to them to ensure counterfeit parts and materials do not make their way into deliverable products.

14. CONFIDENTIAL/ PROPRIETARY INFORMATION

Suppliers shall take proper care to protect all sensitive information, including confidential, proprietary and personal information.

15. CYBERSECURITY MATURITY MODEL CERTIFICATION (CMMC) COMPLIANCE

As Attalon and other Defense Prime Contractors have enhanced their cybersecurity defenses, attackers have expanded their targets to include the supply base, searching for weaknesses that they can exploit. Supplier shall employ appropriate tools and practices to protect Attalon's provided data and advise Attalon within 2 days of when a cyberattack has been detected which may have compromised Attalon's data. Where DFARS 252.204-7012 Safeguarding Covered Defense Information and Cyber Incident Reporting applies, supplier shall additionally rapidly report cyber incidents directly to DoD at <https://dibnet.dod.mil/portal/intranet/> and Attalon. This includes providing the incident report number, automatically assigned by DoD, to Attalon as soon as practicable. Supplier represents and warrants that it has and will maintain a current (within the past three (3) years) cybersecurity assessment that is compliant with DFARS 252.204- 7012, 7019 and 7020 (or 7021 if applicable to the Contract) for any information system that stores, processes, and/or transmits covered defense information.

16. CERTIFICATION

I have read this document, and as a person empowered to bind [name of company], and hereby represent and certify that [name of company] shall comply with each statement and policy.

Name: _____

Signature: _____

Title: _____

Date: _____