



Policy Owners:	Policy & Ethics Committee
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## OPEN DOOR POLICY

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### PURPOSE

ATC Management Inc.'s ('ATC' or the 'Company') Code of Conduct requires all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. This policy provides guidance to employees for the reporting of any instances of non-compliance with the Code of Conduct, corporate policies, laws and regulations, or other similar concerns.

### SCOPE

This policy applies to all ATC employees, suppliers, and contingent workers.

### RESPONSIBILITIES

Employees are responsible for:

- Practicing honesty and integrity in fulfilling their job responsibilities
- Complying with all applicable laws and regulations
- Complying with ATC's Code of Conduct and corporate policies
- Reporting all known or suspected violations of ATC's Code of Conduct, corporate policies, or laws and regulations, via one of the following avenues:
  - o Supervisor: Employees are encouraged to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern.
  - o Human Resources: If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in Human Resources or anyone in management whom you are comfortable approaching.
  - o Vice President of Audit & Risk Management: For suspected fraud, or when you are not satisfied or uncomfortable contacting your supervisor or Human Resources, individuals should contact the Vice President of Audit and Risk Management.
  - o Ethics & Compliance Helpline: If you prefer to remain anonymous, you may contact the Helpline at (866) 384-4277 or [www.atcllc.ethicspoint.com](http://www.atcllc.ethicspoint.com). The Helpline is administered by a third party, and a reference code will be provided to follow-up on concerns raised.
- Cooperating and participating, as requested, during an investigation
- Respecting the right of their fellow co-workers to make legitimate complaints of inappropriate or offensive conduct

Supervisors are responsible for:

- Providing an open environment for employees to seek advice on appropriate workplace conduct or to report issues or concerns
- Being vigilant of any situations that could result in violating ATC's Code of Conduct or corporate policies, and seeking assistance when in doubt of proper handling
- Reporting potential violations (either self-identified or reported to them by their subordinates) via one of the mechanisms outlined above

The Policy & Ethics Committee is responsible for:

- Implementing a corporate Ethics & Compliance Program to facilitate employee and contingent worker adherence to laws, regulations, and ATC standards
- Reviewing and approving new and revised corporate policies
- Promptly investigating all reported complaints and allegations
- Keeping reports confidential to the extent possible, consistent with the need to conduct an adequate investigation

The Vice President of Audit and Risk Management is responsible for:

- Notifying the complainant and acknowledging receipt of the potential violation within five business days
- Overseeing follow-up and resolution of investigations, inclusive of corrective actions
- Immediately notifying ATC's Audit Committee of any complaints regarding accounting/audit irregularities, falsification of records, fraud/theft, retaliation, or allegations involving an ATC Officer
- Reporting, at least annually, to the Audit Committee on compliance activity

The Vice President of Human Capital is responsible for:

- Developing and implementing policy-related training programs
- Ensuring that a Personnel Risk Assessment is completed for all employees, in accordance with the [Personnel Risk Assessment Policy](#)

## **NON-RETALIATION**

ATC strictly prohibits retaliation in any way against anyone who has issued a report or complaint, has expressed a concern about inappropriate conduct, or has cooperated in an investigation. Therefore, the initiation of a complaint, in good faith, shall not under any circumstances be grounds for discipline. It is a violation of Company policy for an individual to be disciplined or otherwise disadvantaged for reporting a potential concern. If an employee believes that he or she has been retaliated against in any way, he or she should report such retaliation in the same manner as set forth above.

## **REPORTING**

It is the responsibility of all ATC employees to report any suspected violations of this policy.

## **EXCEPTIONS/VIOLATIONS**

There are no exceptions to this policy.

Employees who violate this policy are subject to disciplinary action, up to and including termination.

If an investigation results in a finding that an individual made false or bad faith accusations of inappropriate conduct or retaliation, the accuser may be subject to disciplinary action, up to and including immediate termination.

This policy does not prohibit or dissuade employees from engaging in legally protected activities such as discussing wages, benefits, or terms and conditions of employment; forming, joining, or supporting labor unions; or bargaining collectively through representatives of their choosing.