

Supplier Code of Conduct



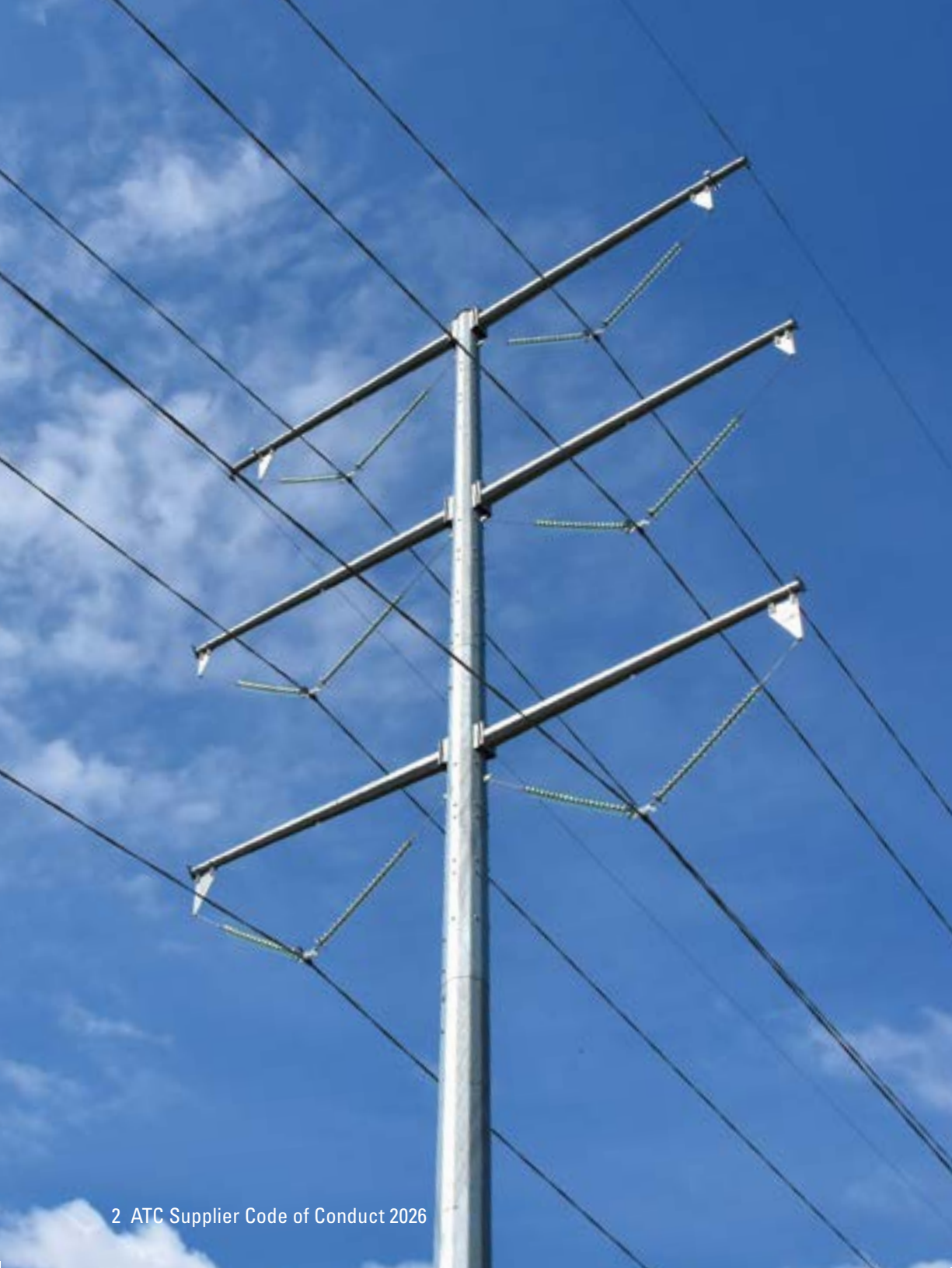
Our Values Drive Our Business

At ATC, our values drive our business as well as our interactions with one another. Our commitment to ATC's culture connects us through a shared purpose, curiosity and positive energy.

Every day, ATC depends on our suppliers to be an extension of our team, not only to fulfill their business obligations, but to act in accordance with our values and principles:

we care | we challenge | we commit | we communicate | we compete | we celebrate

2026



ATC Supplier Code of Conduct

Our Code of Conduct helps ATC's suppliers make decisions that align with our values and embrace our corporate culture.

We expect our suppliers to act ethically and in accordance with this Code of Conduct at all times, as well as report known or suspected violations. We also require suppliers to comply with supporting policies that are referenced in the Code of Conduct and all applicable contracts with ATC.

This Code of Conduct applies not only to ATC's suppliers as businesses, but also to our supplier's employees performing work on behalf of ATC.

Reporting Resources

Resources available to ask questions or report concerns include:

- ATC business contact
- ATC's Ethics & Compliance Helpline:
atcllc.ethicspoint.com or (866) 384-4277

The Helpline is operated by an independent third party; therefore, suppliers may provide information anonymously. A reference code will be provided to follow up on concerns raised.



Demonstrate Care For One Another



Safety

Safety is a key priority for us. Both ATC employees and our suppliers are responsible for keeping each other safe.

- Suppliers should be aware of people and their surroundings to identify and mitigate incidents.
- Suppliers providing a service to ATC must adhere to general and site-specific safety requirements, which includes prohibiting the use and possession of illegal drugs and alcohol, restrictions on the possession of weapons, and supporting a violence-free environment.
- Suppliers are obligated to stop work and speak up if a situation appears dangerous or unsafe.

Inclusion & Belonging

ATC's inclusive culture brings together a talented workforce – and supplier base – that represent the communities and world in which we live.

- We proactively seek opportunities to conduct business with competitive and diverse suppliers.
- At all times, our suppliers should act professionally and respectfully to reflect ATC's core principles of mutual respect, care and courtesy.
- We maintain a work environment that is free from harassment and discrimination.



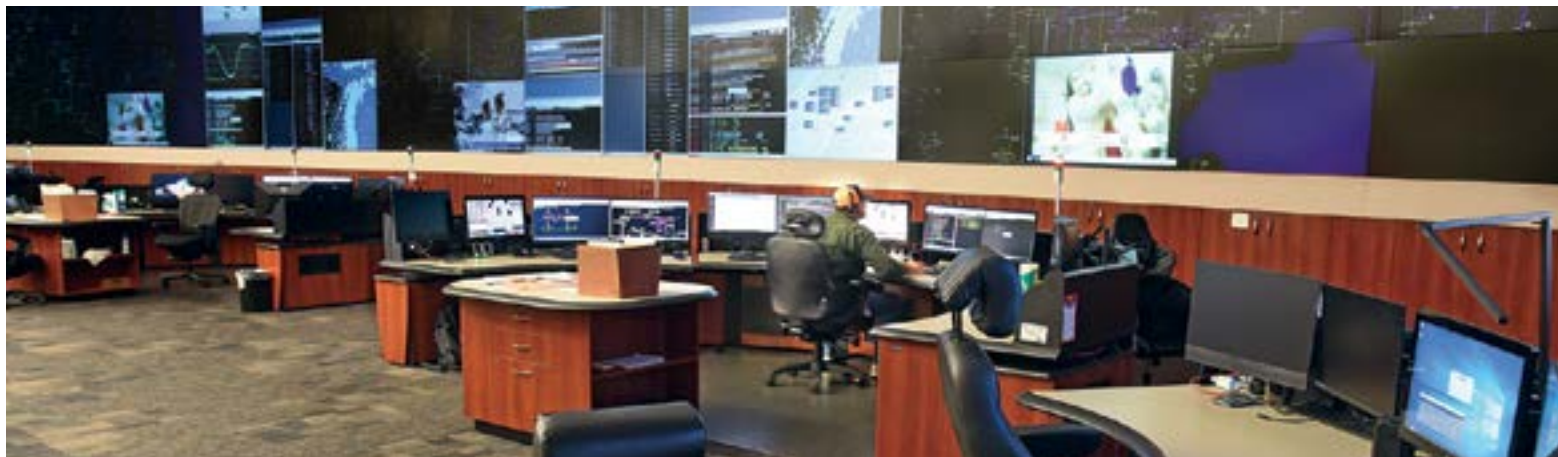
Stakeholder Experience

At ATC, we focus on providing a positive stakeholder experience.

We rely on our suppliers to interact with ATC's stakeholders in a professional manner and operate efficiently and effectively in order to reflect positively on ATC.



Act With Sound Professional Judgment



Use of Assets

Protection of ATC's assets contributes to our collective success. Company assets and resources – such as equipment, office supplies and materials from job sites – must be used for legitimate ATC business purposes and never for personal gain.

Use of ATC Resources

At ATC, we rely on the security of our cyber systems to conduct business, so ATC employees and suppliers alike must use electronic resources responsibly.

- This applies to ATC-issued devices as well as any other devices that are intended to access ATC systems.
- The highest care should be taken to protect the privacy of system accounts and credentials. For example, it is never appropriate to share passwords. Suppliers are accountable for actions taken on ATC systems with their user identification.
- Suppliers who are provided ATC equipment or credentials to access our systems or facilities must comply with applicable policies.

Use of Information

Suppliers and their employees are responsible for maintaining the security and confidentiality of, and using, any information acquired during their work with ATC.

- Such information is only to be used to support legitimate ATC business purposes.
- Publishing or uploading ATC proprietary or confidential information to public-facing or non-approved Artificial Intelligence or Machine Learning tools is not permitted.
- Supplier representatives may never speak to the media on ATC's behalf and can only use ATC's name/logo as approved.



Protect ATC's Interests

Financial Integrity & Cost Management

We trust our suppliers to have internal controls that support the accuracy and completeness of information provided.

- We require transparency in the invoicing process – confirming labor, equipment and materials are properly substantiated and billed in accordance with applicable purchase orders and contracts.
- Keeping our costs down enables us to provide more affordable energy to our communities.

- Our suppliers must demonstrate a commitment to cost savings and continuously evaluate more efficient ways of completing work.
- When we use our resources wisely, everybody benefits.

Compliance with Laws & Regulations

As a highly regulated public utility, compliance is critical to the successful operation of our business. Our suppliers must understand and comply with the laws and regulations that apply to the products they supply to ATC and applicable to the work they perform for ATC.

Environmental Commitment

ATC is committed to continuous improvement and environmental leadership, and we actively seek suppliers that share this mission. We expect our suppliers to support our Environmental Commitment Statement and take steps to reduce the environmental impacts of their work.





Serve as a Trusted Business Partner



Conflicts of Interest

Conflicts of interest arise when personal interests interfere – or even appear to interfere – with business interests. Suppliers should avoid situations that could affect their ability to act in a fair and unbiased way and must disclose any real or perceived conflicts of interest.

A conflict of interest may arise if a supplier:

- Has a personal relationship with an ATC business contact
- Is owned or controlled by an ATC employee
- Retains an ATC employee to perform work for their organization
- Uses ATC information to benefit themselves or a competitor

Suppliers should never:

- Offer gifts, meals or entertainment to ATC employees during the contract proposal, awarding or negotiation processes
- Offer bribes, kickbacks or other improper payments to influence ATC employees
- Give cash or cash equivalents, including gift cards, to ATC employees
- Engage in any form of bribery with any political, regulatory, or other government official

Reciprocal meal or entertainment exchanges that serve legitimate business interests, as well as promotional items or gifts of nominal value (under \$100) are generally permissible.

Responsible Sourcing

ATC is committed to protecting the rights of all individuals, and we expect the same from our suppliers. We choose to work with suppliers who:

- Demonstrate responsible and transparent business practices, including the commitment to provide materials that are responsibly sourced
- Support the rights of individuals to openly communicate any workplace concerns to leadership without the fear of retaliation

Trade Controls

ATC must comply with U.S. and other applicable trade controls. We choose to work with suppliers who:

- Do not engage in direct or indirect commercial activity with sanctioned countries, territories, entities, persons or sectors.
- Conduct appropriate due diligence to comply with export controls.
- Comply with applicable customs regulations.



Suppliers must obtain, review, and adhere to the following ATC Policies, which are distributed to your business contact. If you need a copy of any policy, please reach out to your ATC business contract for assistance or refer to atcllc.com/code-of-conduct-and-policies.

- Acceptable Use of ATC Resources Policy
- Asset Donation & Disposal Policy
- Drug & Alcohol Policy
- Equal Employment, Non-Discrimination & Anti-harassment Policy
- Enterprise Information Management
- External Communications Policy
- Personnel Risk Assessment Policy
- Physical Access Control Policy
- NERC Reliability Standards Policy
- Safety Policy
- Social Media Policy
- Tobacco Use Policy
- Workplace Violence Prevention Policy

Thank You

Commitment to Compliance

While the Supplier Code of Conduct is based on ATC's values and standards, there will be times when professional judgment is necessary. ATC suppliers are encouraged to ask questions and are expected to raise issues so ATC can address them proactively.

Reporting Resources

- ATC business contact
- ATC's anonymous Ethics & Compliance Helpline:
atcllc.ethicspoint.com or (866) 384-4277



Thank you for your commitment to doing business the right way and adhering to our Supplier Code of Conduct.

