



SAFETY POLICY

Effective Date: 08/01/2026

PURPOSE

The safety and health of our workforce is one of ATC's corporate priorities. ATC is committed to providing and promoting the knowledge, structure, tools, and support to prevent serious injuries, illnesses, and deaths at the workplace. This policy summarizes how ATC fulfills its commitment as well as its regulatory obligations, including compliance with Occupational Safety and Health Administration (OSHA) regulations and all other federal, state, and local requirements. This policy also outlines the expectations regarding behaviors, roles, and responsibilities required to achieve a culture where we always do our work safely. ATC prioritizes the identification and control of high-risk activities with the potential for Serious Injury or Fatality (SIF). Eliminating or controlling these risks is the primary objective of the ATC Safety Program.

SCOPE

This policy applies to all Covered Workers.

DEFINITIONS

Covered Workers – All employees, contingent workers and contractors.

ATC Safety Program – Written plan(s) of action and elements designed to manage Workplace safety and health and to prevent accidents and occupational diseases.

General Safety Requirements – Rules or practices applicable to all Covered Workers.

Work-Specific Safety Requirements – Rules or practices specific to a work group or a detailed operation within ATC.

Workplace – The location from which the individual is performing work (e.g., field, office, home).

RESPONSIBILITIES

ATC employees, Contingent Workers, and Contractors are responsible for:

- Creating and/or maintaining a safe and healthy workplace
- Performing work in a manner that shall not endanger their health or safety and that of the public, and Covered Workers.
- Stopping work when an unsafe condition or act is observed
- Reporting safety and health concerns and conditions and immediately correcting when possible
- Responding to safety issues as they arise
- Wearing required personal protective equipment
- Reporting all incidents, injuries, or near miss sustained at any workplace in conjunction with regular work duties as soon as possible once immediate danger has passed:
 - See Employee Work-Related Injuries and Illness – Response and Reporting or Contractors Incident Reporting Guide
- Complying with ATC's Safety Program
- Participating in and cooperating in ATC situational learning activities

ATC leaders are responsible for:

- Supporting this policy through leadership, personal example and ensuring a safe work environment
- ATC leaders with Contingent Worker and/or Contractors oversight are responsible for:
 - Serving as the point of contact on safety matters, including compliance and performance
 - Communicating and reinforcing General and Work-Specific Safety Requirements

The Safety team is responsible for:

- Developing, maintaining, and leading the overall ATC Safety Program in compliance with current laws, regulations, and best business practices
- Facilitating, implementing, and communicating new laws, regulations, and best business practices concerning General Safety Requirements
- Establishing General Safety Requirements in the form of programs, procedures, and processes
- Providing, coordinating, or arranging for subject matter experts both internally and externally to support employees and business units with respect to safety topics
- Providing assistance as needed in the inspection, assessment, situational learning, and accident investigation processes
- Promoting and inviting active involvement and participation of all Covered Workers in the ATC Safety Program
- Partnering with other business units to establish Work-Specific Safety Requirements
- Assisting other business units in the periodic and on-going training of Work-Specific Safety Requirements
- Providing periodic and on-going training of General Safety Requirements

REPORTING

It is the responsibility of all ATC employees to report any suspected violations of this policy, in accordance with ATC's Open Door Policy.

EXCEPTIONS/VIOLATIONS

Exceptions to this policy require the approval of the Policy Owners listed above. Employees who violate this policy are subject to disciplinary action, up to and including termination. Contingent Workers or Contractors who violate these responsibilities are subject to dismissal from ATC work or termination of their contract.