



TOBACCO FREE WORKPLACE POLICY

Effective Date:

PURPOSE

ATC Management Inc. ('ATC' or the 'Company') provides a tobacco-free workplace.

SCOPE

This Policy applies to all ATC employees, contingent workers, contractors, visitors, and customers while on ATC premises. See Worker Classification Policy.

DEFINITIONS

Tobacco Product –Any product made from or containing tobacco that people use or consume. This includes any part, component, or accessory of a tobacco product. Examples include cigarettes, cigars, pipes, smokeless or chewing tobacco, and vaping products such as e-cigarettes, e-pipes, e-hookahs, and e-cigars (and other electronic nicotine delivery devices)

RESPONSIBILITIES

ATC is a tobacco free environment. Use of Tobacco Products within Company buildings, enclosed worksites, or Company-leased vehicles is prohibited. This includes substation control houses and owned or jointly owned facilities where ATC conducts its business.

Use of Tobacco Products is permitted only in designated outdoor areas, or utility corridor rights-of-way, or off the property if no area is designated.

In addition, selling items containing Tobacco Products on ATC property is prohibited.

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.

NON-RETALIATION

ATC strictly prohibits retaliation in any way against anyone who has made a report or complaint, expressed a concern about inappropriate conduct or cooperated in an investigation. Disciplining or otherwise disadvantaging an individual because they reported a potential concern or cooperated in an investigation is, itself, a violation of ATC policy.

EXCEPTIONS/VIOLATIONS

Exceptions to this policy require the approval of ATC. Employees who violate this policy are subject to disciplinary action, up to and including termination.