



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 or derived from tobacco that is intended for human consumption, including any component, part, or accessory of a tobacco product. Tobacco products include, but are not limited to, cigarettes, cigars, dissolvable products (chew, sticks, strips), electronic cigarettes (aka vape pen, e-hookah, hookah pen), smokeless tobacco, waterpipes (aka hookah, shisha, narghile, argileh), and any non-FDA approved nicotine delivery device.

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 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.