



Atmos™

FILTRATION TECHNOLOGIES

Supplier Code of Conduct



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“We are committed to being a strong, ethical company and to always doing the right thing within our operations and supply chain.”

A Message from Steph Disher

At Atmus Filtration Technologies, we are driven by our purpose: **Creating a better future by protecting what is important.** Since 1958, we have always valued the importance of building strong relationships with suppliers who lead with integrity and conduct business ethically. Together with our suppliers, we can deliver quality products with best-in-class technology that protects our people, our planet and our customers.

Our Atmus Supplier Code of Conduct (“Code”) is rooted in our values: Build Trust. Be Inclusive. Have Courage. Show Caring. Our code is designed to guide and inform our suppliers on the behaviors and actions expected while conducting business with Atmus.

We are committed to being a strong, ethical company and to always doing the right thing within our operations and supply chain. With your adherence to our Code, we can deliver exceptional products that leave a positive impact on the world.

Thank you for your partnership and dedication.

Steph Disher

Chief Executive Officer
Atmus Filtration Technologies

Values

Build Trust in every relationship every day.

We do what we say we will do, and we do what is right, no matter the circumstances. We are open, honest and transparent. We earn trust by actively listening and being responsive to all our stakeholders. When we do not live up to our own expectations, we admit it, address what happened and apply those learnings.

Be Inclusive by embracing our differences and building a community where everyone feels valued.

Our people and business partners reflect the world we live in, and we are committed to creating an environment where everyone feels safe, welcome and valued.

Show Caring by engaging with kindness and consideration for the wellbeing of others.

We seek to understand and acknowledge the thoughts, feelings and needs of others. Our caring extends beyond our walls to our customers, our communities and our planet. Caring ignites our aspirations to create and innovate every day.

Have Courage to speak up, take action and shape the future.

We foster an environment where everyone feels empowered to speak up, share ideas and persevere to deliver for our stakeholders.

Introduction

Supplier Code Of Conduct

Our Purpose

Our Supplier Code of Conduct is rooted in our purpose and values.

We partner with Suppliers who share our values and purpose to create a better future by protecting what is important. Together, we can achieve a competitive advantage, an inclusive culture and a better future for our shared humanity. We expect that our business partners operate ethically, legally and in accordance with the Atmus Supplier Code of Conduct.

Our Shared Commitment

Atmus Filtration Technologies Inc., together with its subsidiaries (“Atmus”) is committed to transparency in our partnership with Suppliers. In this Code we outline our key principles and expectations so that we all operate business in a fair, legal and ethical manner. **Upholding ethical business practices that promote honesty, integrity and fairness is our shared responsibility, no matter where we are in the world.** Use our Code as a resource to help you navigate situations and align your decisions with our values, applicable laws and policies.

When the right decision is not clear, we will work with you to address any challenges or issues that arise. In these situations, reach out directly to your Atmus contact, our Legal or Ethics and Compliance department, or any of the resources on [page 16](#) for guidance.



Atmus understands and expects that our product and service Suppliers will have their own internal codes of ethics and conduct. Suppliers are responsible for ensuring that all principles and expectations of this Supplier Code of Conduct are cascaded and adhered to, within their own operations and by their own direct suppliers.

We also encourage each Supplier to uphold the same standard of requirements and to work proactively in their supply chain, beyond their direct suppliers, to implement similar standards as outlined in the Atmus Supplier Code of Conduct.



Key Expectations:

Throughout the Supplier Code, we have identified “**Key Expectations**” as they relate to each specific principle. These key expectations are meant to highlight the fundamental responsibilities of our Atmus Suppliers.

Supplier Responsibilities

We will succeed in achieving our purpose if we all work together. The Code applies to everyone at your organization, including your employees, management, senior leaders, sub-contractors, tiered suppliers and other business partners. No matter our role, we are all stewards of integrity. It is the expectation of Suppliers to do the following:

1

Act ethically and use good judgment in everything you do on behalf of the company

2

Understand and follow all principles set forth in this Code

3

Seek guidance and ask questions if you are unsure about a situation or decision

4

Report any suspected violations of the law or our Code, unless prohibited to do so by local law

5

Do not retaliate against anyone who raises a concern in good faith

6

Participate in required training and survey requests in a timely manner



Failure to comply with our Code may result in termination of contract or legal actions.



Build Trust

Build trust in every relationship every day.

Protecting Our Company from Fraud

Accurate Books, Records and Disclosures

Suppliers have a responsibility to ensure that all Company books and records are complete, accurate, processed in a timely manner and up to date. Suppliers shall accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation and performance in accordance with applicable regulations. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Risk Identification and Management

Suppliers must have a process in place that identifies and assesses the relative significance of legal, environmental, health and safety, labor practice, ethical and other risks associated with their operations. Corresponding procedures and internal controls must be implemented to mitigate the identified risks.



Key Expectations:

- Comply with International trade and export regulations.
- Satisfy compliance obligations as required by law or requested by Atmus.
- Respond accurately and in a timely manner to any due diligence requests received from Atmus.

International Trade

We take pride in the business we do around the world.

Because of our global presence, our business is subject to various international trade laws. Suppliers will follow all laws and regulations regarding exports, sanctions and other trade matters. These laws are created to regulate the trade of goods, services and technology from one country to another. This includes avoidance of direct or indirect commercial activity with sanctioned countries, territories, entities, persons or sectors. Our Suppliers are required to conduct due diligence to comply with international trade laws and have an obligation to maintain ethical trade practices.

Suppliers shall not agree to any boycott-related requests. Boycott-related requests can be initiated by foreign parties pressuring companies to boycott specific countries or their products. Anti-boycott laws prohibit companies from agreeing or complying with unsanctioned boycott requests.



Key Expectations:

- Present financial statements and audit reports fairly and accurately.
- Cooperate fully with audit requests and assessments to ensure compliance with the Code.





Protecting Our Company against Bribery and Corruption

Suppliers will not tolerate bribery and corruption while conducting business on behalf of Atmus.

Our Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and any other applicable anti-corruption laws. Suppliers must not offer, provide or accept bribes, kickbacks or any other corrupt payment.



Facilitating payments to government officials used to encourage the performance of actions they are already required to perform, such as issuing permits, is expressly prohibited.

When working with government officials, or anyone with any affiliation with a government department, Suppliers need to be extra vigilant in how business is conducted. Business and interactions with government employees will be conducted in a fair and honest way. Suppliers must comply with all applicable anti-corruption laws regarding improper payments to government officials.



Key Expectations:

- Adhere to applicable anti-bribery and anti-corruption laws and regulations.
- Be transparent in business transactions and reporting.
- Do not provide facilitation payments to government officials under any circumstance.



Key Expectations:

- Comply with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which Suppliers operate.
- Compete fairly and do not engage in anti-competitive behaviors that violate applicable laws.

Fair Competition

We are committed to competing fairly and lawfully in the marketplace and complying with all applicable competition or antitrust laws. Our Suppliers must avoid agreements and discussions about sensitive or competitive matters, as even casual conversations with competitors may sometimes be perceived as restraining competition. Suppliers must not participate in anti-competitive behaviors, such as:

- Price fixing
- Price discrimination
- Preventing competitors from entering a market
- Allocating sales territories or markets with competitors
- Bid rigging
- Knowingly using a competitor's trade secrets
- Engaging in deceptive sales or marketing practices



Conflicts of Interest

Suppliers must always avoid conflicts of interest.

A conflict of interest occurs when personal interests influence or appear to influence decisions made for the company. Suppliers and their employees must promptly notify Atmus of situations where financial or other personal interests conflict with business dealings.

Common potential conflict-of-interest situations include:

- **Business courtesies** – giving or accepting of gifts, favors or other incentives.
- **Financial interests** – having a significant financial interest in Atmus or our competitors.
- **Undisclosed relationships** – having a direct or indirect relationship with a family member or someone with whom you have a romantic or personal relationship that is employed by Atmus.

Business Courtesies

Building strong and transparent relationships with our customers, suppliers and other business partners is essential to our success. Exchanging business courtesies of nominal value, such as an occasional gift or entertainment, should be limited and given/accepted cautiously. Suppliers must never provide or accept courtesies that could influence or appear to influence decisions made on behalf of Atmus.

When offering or accepting business courtesies, Suppliers must ensure that the following factors have been considered prior to the occurrence:

- **Legality** – the business courtesies must be legal in the country of the giver and receiver.
- **Intent** – confirm the gift was not meant to influence a business decision.
- **Costs** – business courtesies must be nominal in value.
- **Frequency and timing** – business courtesies should be infrequent and unsolicited. Ensure there are no requests for proposals (RFPs) or bids open at the time of the business courtesy.
- **Cash or cash equivalents** – business courtesies given in cash or cash equivalents are never allowed.



Suppliers will notify Atmus immediately of any exchange or business courtesy offer that is not aligned with these expectations.

Business Courtesies and Government Officials

Suppliers must never accept or give government officials anything to gain or influence business decisions. Suppliers must always maintain accurate and complete records documenting business expenses with government officials.

Government Contracts

Special laws and regulations apply when we sell or provide services to a government entity. These rules also apply to tiered suppliers. If supplier activity involves commitments with government entities, Suppliers have the responsibility to understand and follow the applicable laws and regulations.



Key Expectations:

- **Notify Atmus of any requests or demands of a business courtesy.**
- **Do not entertain or engage in business courtesies that influence or appear to influence business decisions.**
- **Promptly notify and disclose of potential, actual or perceived conflicts of interest to Atmus.**

Protecting Our Company Assets

PROTECTING OUR CONFIDENTIAL INFORMATION

Our Suppliers have a responsibility to protect the confidentiality, integrity and availability of our sensitive information, including confidential, proprietary and personal data. Information obtained, whether directly from Atmus or through third parties, should only be used for the intended and authorized business purpose for which it was provided. Suppliers should have information management, information security and cybersecurity programs in place to mitigate threats to their information systems, products, services and supply chain. Suppliers must comply with all related legal requirements.



If you become aware of any potential cybersecurity threats, including attacks on other business partners, notify Atmus immediately.

Key Expectations:

- Safeguard Atmus information, intellectual property and physical assets, and use them for the intended and authorized purpose.
- Adhere to intellectual property, data protection and privacy rules, laws and regulations.
- Immediately notify Atmus of counterfeit or infringed products, materials or parts.
- Promptly notify Atmus of security incidents and breaches.
- Appropriately manage the data life cycle of Atmus information (storage, access, transference and disposal).

PROTECTING INTELLECTUAL PROPERTY

In addition to following our standards for protecting confidential information, we vigorously protect our intellectual property with patents, trade secrets, trademarks, copyrights and contract provisions. We expect our Suppliers to respect and comply with all rules, laws and regulations governing intellectual property rights in their respective jurisdictions, as well as in any contracts negotiated between Atmus and the Supplier. Proprietary information shall not be disclosed without express written consent of Atmus, and only be used for the intended and authorized business purpose for which it was provided. Disclosure of proprietary information without consent may result in the loss of patent rights for Atmus.

We are also committed to maintaining the quality, integrity and reliability of our products for our customers around the world. Counterfeit parts or materials are never to be supplied to Atmus for use in our products. Suppliers are responsible for conducting extensive due diligence of their sourcing to ensure the authenticity of products, materials or parts supplied to Atmus. If a Supplier becomes aware that they may have supplied Atmus with counterfeit parts or materials or receives a notice of infringement from a third party regarding a part that it supplies to Atmus, then the Supplier should notify Atmus immediately.

PROTECTING DATA PRIVACY

Suppliers commit to protecting the personal data of Atmus employees, customers and other business partners. Compliance with applicable laws and regulations on the transfer, processing, protection and retention of personal data, including, without limitation, the EU General Data Protection Regulation (GDPR), is expected. All Suppliers that process personal data on Atmus's behalf must enter into contractual terms, usually known as a Data Processing Agreement ("DPA"), detailing their responsibilities as it pertains to their handling of Atmus personal data.

Suppliers must ensure that personal data is treated properly by limiting access or processing of personal data to the minimum necessary for specific business purposes and only as long as necessary. Once information is no longer needed, it is destroyed securely and in compliance with the Atmus Confidential Disclosure Agreement.



If you become aware of a potential incident or breach involving personal data, contact Atmus immediately.

PROTECTING OUR PHYSICAL ASSETS

Our Suppliers have the responsibility to protect any physical assets that belong to Atmus. This can include prototype parts to manufacturing or test equipment placed on site at a Supplier location. Assets should only be used for the intended and authorized purpose.



Avoiding Insider Trading

Suppliers of Atmus may have access to inside information about our Company and other companies, such as our customers.

Inside information is defined as material, nonpublic information that would likely influence someone's decision to buy, sell or hold securities. While Suppliers are always obligated to protect confidential information, they should be aware of information that could be considered inside information and understand their responsibilities.

Suppliers must never trade in Atmus's common stock or the common stock of other business partners while in possession of inside information about Atmus or other business partners. Suppliers must never share inside information to anyone that does not have a need to know such information, including family, friends or third parties, so that they may trade on the information, which is known as "tipping."



Trading on inside information and tipping are illegal and can result in criminal penalties for the individuals involved, including the Supplier organization.



Key Expectations:

- Comply with federal and state insider trading laws.
- Maintain confidentiality regarding material non-public information, using it solely for the intended and authorized purpose.
- Immediately report any known or suspected violations of insider trading.

Be Inclusive

Be inclusive by embracing our differences and building a community where everyone feels valued.

Protecting an Environment that Welcomes Diversity, Inclusion and Equity

We are committed to creating an environment where everyone feels safe, welcome and valued. We embrace the different cultures, languages, abilities and experiences that make up our company and our business relationships. The diversity of our Suppliers provides us with different perspectives and helps us achieve our potential. We are at our best when each one of us feels included, respected and appreciated for our unique talents and perspectives.



Key Expectations:

- Ensure fair treatment of all regardless of protected characteristics or activities.
- Maintain a positive workplace, free of harassment, bullying or abusive conduct.

Protecting and Fostering a Respectful Partnership

To protect and foster a culture of diversity and inclusivity, we focus on the way we treat one another. Supplier actions towards one another should reflect those of dignity and respect. Suppliers must treat each other free of prejudice, bias or discrimination of protected characteristics or activities, including:

- Age
- Citizenship status
- Color
- Disability
- Gender
- Gender identity or expression
- Genetic information
- Marital status
- Military or veteran status
- National origin
- Pregnancy
- Race
- Religious belief
- Sexual orientation
- Union affiliation
- Any other status protected by law

Suppliers will maintain a positive workplace free of harassment, bullying or abusive conduct. Suppliers are all accountable for creating a work environment that is positive and professional. We do not tolerate harassment, bullying or abusive conduct.

Harassment can come in many forms, including written and verbal. Suppliers must be committed to reinforcing the importance of a respectful work environment within their organization and in business dealings with Atmus.



If you become aware of or suspect discrimination or harassment, report it to the [Atmus Ethics Line](#).

Have Courage

Have courage to speak up, take action and shape the future.

Protecting the Right to Speak Up

We strive for an environment where everyone feels empowered to speak up and raise concerns. It takes courage to speak up when we see conduct that is inconsistent with our values or that violates our Code, policies or laws. Suppliers are required to report any misconduct, unless prohibited by local law.

Suppliers are responsible for having an incident reporting mechanism in place for their employees and business partners to raise questions or concerns of business integrity and ethical compliance. The mechanism has the option for the reporter to file anonymously and is accessible to all. Suppliers will not allow retaliation in any form against those who report in good faith.

Suppliers should also have mechanisms in place to protect whistleblowers, ensuring confidentiality and safeguarding against retaliation.



Key Expectations:

- Promptly report any incidents or violations that may impact Atmus or be in violation of this Code.
- Do not engage in any form of retaliation against employees or business partners who report in good faith.
- Cooperate honestly and completely in the Atmus investigation process, or with relevant authorities, as required.

Ways to Speak Up

Suppliers may also raise any business-related concerns or matters regarding compliance with this Code through the Atmus Ethics Line.

Our Ethics Line is a 24-hour, toll-free, independent resource provided by a third party that offers our employees and business partners a confidential and safe way to report concerns and violations of the Code. The Atmus Ethics Line can be accessed several ways:

- By web: atmus.com/ethicsline
- By phone (US/Canada): 1 (800) 497-1390
- By phone (Mexico): 1 (800) 099-0170

To reach the Ethics Line outside the US, Canada or Mexico, please refer to the listing of local numbers on the Ethics Line webpage: atmus.com/ethicsline

- By email: ethics@atmus.com

Suppliers are expected to fully cooperate in the Atmus investigation process, as required. This includes participating in and facilitating interviews, providing supporting documentation and maintaining confidentiality.

Retaliation

We are committed to an environment where our employees and business partners feel free to ask questions or raise concerns without fear of retaliation.

Retaliation is any negative consequence someone may experience for asking a question, raising a concern in good faith or participating in an investigation.

Atmus does not tolerate retaliation. If you become aware of or suspect retaliation against anyone who reports conduct that they believe in good faith to be in violation of this Code, contact one of the speak up resources listed above.

Show Caring

Show caring by engaging with kindness and consideration for the wellbeing of others.

Product Safety and Quality

To fulfill our purpose, we are committed to producing safe, reliable, high-quality products and expect the same from our business partners.

Suppliers must follow all applicable laws and meet standards related to the quality and safety of their products, as well as their own quality control standards and product-testing procedures. Suppliers must never take shortcuts in designing, manufacturing, selling, distributing and servicing any of their products, and will ensure the accuracy of their quality records. Suppliers shall reference the quality standards outlined within the Atmus Supplier Handbook.

Suppliers shall promptly notify Atmus if there is suspicion or awareness of a potential product safety or quality issue.



Key Expectations:

- Implement and maintain quality management systems to ensure consistency in product.
- Comply with product safety and quality standards and regulations.



Key Expectations:

- Respect and protect the rights of workers including fair employment practices, freedom of association and collective bargaining.
- Comply with labor laws, regulations and standards.
- Disclose and comply with due diligence requirements concerning the source and chain of custody of conflict minerals, in accordance with federal laws and regulations.

Protecting Human Rights

We respect human rights around the world. We recognize that we can have a positive impact on the human rights in the communities in which we operate. We are guided by international human rights principles, including the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights to ensure that all people across our operations are treated with dignity and respect.

We expect and support our Suppliers’ commitment to protecting human rights by:

- Ensuring fair employment practices; Suppliers will follow applicable local laws and regulations related to wages, work hours, benefits and working conditions.
- Respecting the freedom of association of employees and recognizing the right to collective bargaining.
- Prohibiting the use of child labor, forced or prison labor and human trafficking.
- Responsibly sourcing materials and partnering only with suppliers who share these principles.
- Respecting the communities where they operate, including the internationally recognized human rights of Indigenous Peoples.



If you suspect or become aware of an actual or potential human rights abuse, contact one of the speak up resources, including the [Atmus Ethics Line](#).

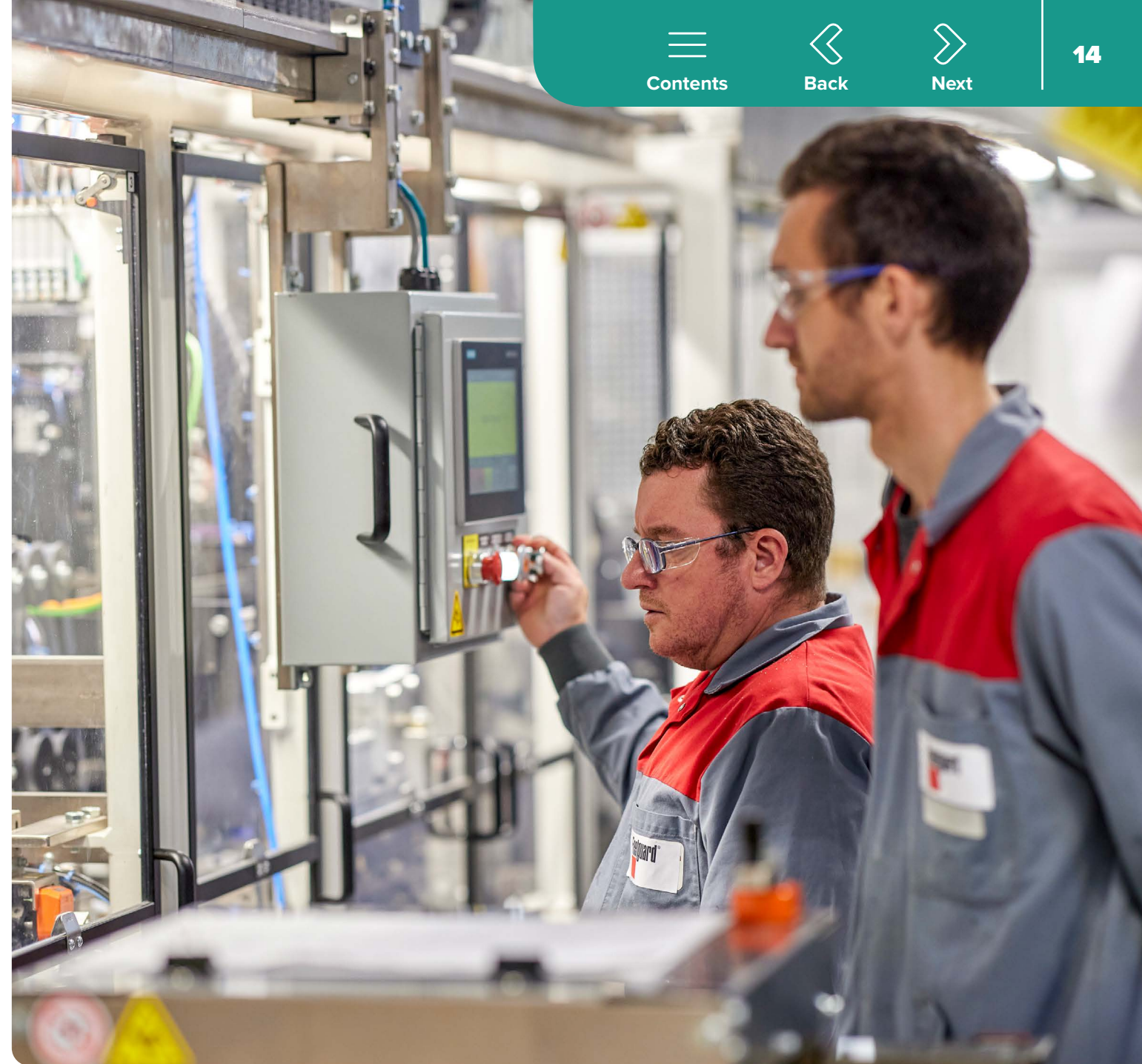
Workplace Health and Safety

We care about the safety and wellbeing of our people by maintaining a safe environment for employees, suppliers, contractors and others associated with our operations.

We have a shared responsibility in maintaining a safe work environment for our people, ensuring that at a minimum we follow all applicable laws and internal company policies to create a positive safety culture where no one gets hurt. We promote a safety culture where we watch out not only for our own safety, but that of others, too.

As our Supplier, you are responsible for ensuring that the people under your supervision are properly trained to perform their jobs safely and that you address any reported unsafe behaviors or conditions promptly. For suppliers working as contracted services at an Atmus Filtration Technologies location, we require conformance to the Atmus Contractor Safety Manual.

As our Supplier, you shall not tolerate threatening or violent behavior and will ensure that your employees do not work while under the influence of substances that could impair judgment, such as alcohol or illegal drugs. We expect accurate and timely reporting of any safety issues or concerns to regulatory authorities in accordance with applicable laws, and notification to your Atmus business partner where a safety issue has the potential to impact performance or business continuity.



Key Expectations:

- Adhere to occupational health and safety laws and regulations.
- Prohibit violent or threatening behavior or operating under the influence.
- Encourage a positive safety culture through adequate training programs, prompt reporting of unsafe behaviors or conditions, and by your actions to address risks and concerns.



Protecting Our Environment and Sustainability

Showing that we care means that we protect what is important for our people, communities and planet. We have a shared responsibility in delivering a more sustainable approach to business to reduce negative environmental impact to our planet.

As our Supplier, you are responsible for ensuring compliance with all laws and regulations relating to environmental requirements, reporting and disclosures as it relates to your company status or classification.

As our Supplier, you commit to being a responsible steward of the environment and demonstrate this by:

- Understanding environmental impacts that exist within your operations and ensure decisions are based on these impacts.
- Taking action to reduce water, energy and raw material consumption.
- Taking action to dispose of materials and wastes in a sustainable manner.
- Providing emissions data upon request in a timely and efficient manner.
- Reporting all environmental impact events and near misses with urgency, honesty and accuracy.
- Cooperating with any due diligence requests received from Atmus.

We can all be a part of the solution by advocating for environmental stewardship in our partnership, in our homes and in our community.

Key Expectations:

- Comply with applicable environmental laws, regulations and standards.
- Implement environmentally sustainable programs to reduce consumption and appropriately dispose of waste materials.
- Cooperate with reporting requests regarding environmental sustainability and compliance.
- Respond in a timely and accurate manner to any due diligence requests received from Atmus.



Additional Resources

	Corporate Communications	media.inquiries@atmus.com
	Community Involvement	atmus.corporate.responsibility@atmus.com
	Cybersecurity	cybersecurity@atmus.com
	Ethics & Compliance	ethics@atmus.com
	Ethics Hotline	atmus.com/ethicsline
	Health Safety & Environmental	hse@atmus.com
	International Trade Compliance	customs.compliance@atmus.com
	Legal	legal@atmus.com
	Privacy	privacy@atmus.com
	Technical/Material Compliance	filtration.material.compliance@atmus.com



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