

# ALTA<sup>®</sup>



## Code of Business Conduct

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# A Message From Our Chief Executive Officer

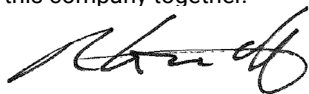
Dear Colleagues,

Alta has always been more than an equipment company. We are innovators, problem-solvers, and leaders in our industry. Our purpose, Delivering Trust That Makes a Difference, helps provide the foundation of all our work, and our people are key to the success of that mission.

Our relationships are the foundation of our work, helping us create Customers for Life. Our actions, interactions, and decisions all reflect on Alta as a whole, making or breaking those very relationships. We are introducing this Code of Business Conduct (or “Code”) to help guide our work and ensure we are always on the right track.

Treat this code as a tool. You can turn to it any time you face difficulties in your work or whenever you have questions about what you should do. If you believe our Code, policies, or laws have been broken, this Code can tell you where to turn with your concerns.

Thank you for investing your time and effort into everything you do. It has been my pleasure to work alongside all of you and I look forward to building the future of this company together.



**Ryan Greenawalt**

Chief Executive Officer



# Our Code of Business Conduct

## Purpose and Overview

From our humble beginnings to the present, Alta has always believed in serving our customers, fulfilling our mission, and building a better company we can all be proud of. How we accomplish our work is just as important as the work itself. We always strive to do what is right, what's best for our company, and what's best for our customers.

Alta expects us all to make decisions that reflect our values and help us succeed in our mission. The right decision might often seem clear, but we know that our work can be complicated. The laws and rules that apply to us can be difficult to understand, and it can be hard to know what to do or where to turn for help.

Our Code of Business Conduct ("Code") is your most important resource in this effort. It is designed with you in mind—a vital resource that will help you:

- Comply with applicable laws, regulations, and Company policies.
- Promote integrity and the highest standards of ethical conduct.
- Address common ethical situations you could encounter in your work.
- Avoid even the appearance of anything improper in connection with our Company's business activities.

## Complying with Laws and Regulations

Alta is committed to compliance with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question or situation you might face in our work. In addition to the Code, Alta has other resources to assist you. Additional resources are listed throughout the Code for this purpose. As always, we rely on you to use good judgment and seek help when you need it.

We operate in multiple cities, states, and countries, so it is important to be aware of different laws and customs that may apply. We respect our customers, business partners, and coworkers throughout the world who have their own norms, customs, and standards. At a minimum, however, all team members must comply with the standards and principles in this Code. If any guidance in our Code conflicts with a local law or requirement, seek guidance from the [Human Resources Department](#) or the [Legal Department](#).

## Who Must Follow This Code

All team members of Alta and its subsidiaries, including executives, corporate officers, and members of our Board of Directors, are required to read, understand, and follow our Code. Consultants, contractors, agents, suppliers, vendors, and temporary employees ("business partners") who serve as an extension of Alta are also expected to follow the spirit of our Code, as well as any applicable contractual provisions.

If you supervise our business partners, you are responsible for communicating our standards and ensuring they are understood. If a business partner fails to meet our ethics and compliance expectations or their contractual obligations, it may result in the termination of their contract.

## Accountability and Discipline

Violating our Code, our policies, or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk. If you see or suspect a violation, [report it](#).

Anyone who violates our Code will be subject to disciplinary action, up to and including termination of their employment with Alta. Violations of laws or regulations may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution.



## Our Principles, Mission, and Values

### Guiding Principles

Alta's Guiding Principles are that we Invest in the Best, we have a Passion for Excellence, we promote Mutual Respect, we are One Team, and we develop relationships that create Customers for Life.

**Invest in the Best**—We will invest in industry-leading talent, a rewarding employee experience, and state-of-the-art facilities and equipment.

**Mutual Respect**—We will promote an environment of mutual respect for all individuals, including our customers, our suppliers, and most importantly our fellow workers.

**One Team**—We are one team. We will empower and encourage each other to interact openly and honestly, make decisions, and work together to correct mistakes. We will provide the tools to do so and will hold ourselves accountable.

**Passion for Excellence**—We share a passion for excellence and will provide products and services of the highest quality.

**Customers for Life**—We will serve the needs of our customers at a level that fosters "Customers for Life," who enthusiastically recommend us to others.

### Mission and Values

More than an equipment company, Alta is an innovator of solutions, delivering diverse products and unrivaled support centered on building lasting customer relationships.

## Speaking Up and Reporting Concerns

If you see or suspect a violation of our Code, our policies, or the law, or if you have a question about what to do, talk to your manager.

If you are uncomfortable speaking with your manager, there are other resources available to help you:

- Contact another member of management.
- Contact the [Human Resources Department](#) or the [Legal Department](#).
- Contact the [Hotline](#).

Alta will make every reasonable attempt to ensure that your concerns are addressed appropriately.

## What to Expect When You Use the Hotline

The Hotline web portal and phone line are available 24 hours a day, seven days a week. Operated by an independent third-party provider of corporate compliance services, the Hotline will document your concerns in detail and forward them to Alta for further investigation.

When you contact the Hotline, you may choose to remain anonymous where permitted by local law. All reports received will be treated equally, whether they are submitted anonymously or not.

After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, Alta will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing it. During the investigation if confidentiality needs to be broken, we will discuss this with the person that made the call prior to breaking confidentiality.

Remember, an issue cannot be addressed unless it is brought to someone's attention.

### What if?

**Q:** I believe someone misused the Hotline by making an anonymous call and falsely accusing someone of wrongdoing. What should I do?

**A:** Report your concern immediately. Experience has shown that the Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on reports, and anyone who uses the Hotline in bad faith to spread falsehoods or threaten others, or with the intent to damage another person's reputation, will be subject to disciplinary action.

 **Learn More**  
[Handbook, Page 13](#)

# Our Workplace

## Staying Safe and Healthy at Work

Ensuring safety is an integral part of everything we do. Reporting risks and hazards is not just the right thing to do, it's a requirement. Failure to speak up about an incident, or to participate in an incident investigation, can have serious negative repercussions for our Company, and for every team member.

Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on you to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety, or security risk. Do your part to keep everyone in the Alta family injury-free.

### Alcohol and Drugs

While at work or on Alta business:

- Always be ready to carry out your work duties—never impaired.
- Do not use, possess, or be under the influence of alcohol, drugs, or any substance that could interfere with a safe and effective work environment.

### Workplace Violence

Violence of any kind has no place at Alta. We won't tolerate:

- Intimidating, threatening, or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage, or other criminal activities.
- The carrying of firearms or other weapons onto Company property unless you are authorized to do so.



### Do the Right Thing

- Follow the safety, security, and health rules and practices that apply to your job.
- Maintain a neat, safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.
- Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to health, safety, and/or the environment. As a team member, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Cooperate with any investigations into incidents.



### Watch Out For

- Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as facility entry procedures and password protocols.



### What If?

**Q:** I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.

**A:** Discuss your concerns with your manager, the [Human Resources Department](#) or the [Safety Department](#). There may be very good reasons for the practices, or you may be bringing to light an issue that needs to be addressed. In either case, raising a concern about safety does not make you a troublemaker. It makes you a responsible team member who is concerned about the safety of others.

**Q:** A subcontractor commits a violation of our standards. Are subcontractors expected to follow the same health, safety, and security policies and procedures as team members?

**A:** Absolutely. Managers are responsible for ensuring that subcontractors and other business partners at work on Alta premises understand and comply with all applicable laws and regulations, as well as with additional requirements our Company may have.



### Learn More

[Handbook, Page 20](#)

## Providing Equal Opportunities

Alta helps bring together team members with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results. We are committed to ensuring that everyone in our workplace—employees, job applicants, and business partners—feel welcome and valued and are given opportunities to grow, contribute, and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income, and advancement in all our departments, programs, and worksites.

If you are responsible for making employment decisions on behalf of Alta, base your decision-making on qualifications, demonstrated skills, and achievements—and never on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, disability, genetic information, or any other characteristic protected by law.

### Do the Right Thing

- Treat everyone respectfully and professionally.
- Select the most capable person when hiring or making employment decisions.
- Do not discriminate against others on the basis of any other characteristic protected by law or Company policy.

### Watch Out For

- Comments, jokes, or materials, including emails, that others might consider offensive.
- Inappropriate bias when judging others. If you supervise others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.

### What If?

**Q:** One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

**A:** You should notify your manager or the [Human Resources Department](#) or the [Legal Department](#). Sending these kinds of jokes violates our Guiding Principles, our email usage policies, and our standards on diversity, harassment, and discrimination. By doing nothing, you are condoning discrimination and tolerating beliefs that can seriously erode the team environment we have all worked to create.

### Learn More

[Handbook, Page 8](#)



## Preventing Harassment

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Alta does not tolerate verbal or physical conduct by any team member that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment.

If you see, suspect, or feel you have been the victim of harassment (including sexual harassment), report it immediately. You'll be helping to preserve a respectful and productive workplace.

### Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome—such as a request for a date, a sexual favor, or other similar conduct of a sexual nature—are made a condition of employment or used as the basis for employment decisions.
- An intimidating, offensive, or hostile environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.

### Do the Right Thing

- Promote a positive attitude—support policies designed to build a safe, ethical, and respectful workplace.
- Help each other—speak out when a coworker's conduct makes others uncomfortable.
- Be professional—do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- [Speak up](#)—report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

### Watch Out For

- Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- Sexual harassment or other unwelcome verbal or physical conduct of a sexual nature.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments.
- Verbal abuse, threats, or taunting.

### What If?

**Q:** While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. We weren't in the office, and it was after regular working hours, so I wasn't sure what I should do. Was that harassment?

**A:** It could be. We expect our employees to practice respect, not only during working hours but in all work-related situations, including business trips. Tell your colleague you are uncomfortable with these actions and ask them to stop. If they continue, report the problem.

**Q:** I frequently hear a colleague making derogatory comments to another coworker. These comments make me feel uncomfortable, but I feel like it's none of my business, and the person they're directed at will speak up if they are offended. Should I ignore this?

**A:** No, you shouldn't. It's up to each of us to help maintain a work environment where people feel welcome, valued, and included. Since you're aware of this situation, you have a responsibility to speak up about it. If you feel you can, speak to your colleague and ask that this behavior stop. If you feel you can't or the comments continue, talk to your manager or another resource.

 **Learn More**  
[Handbook, Page 18](#)



## Using Our Physical and Electronic Assets

Alta entrusts employees with assets (both tangible and intangible) that enable us to operate. Physical assets include Alta facilities, materials, and equipment. Electronic assets include computer and communication systems, software, and hardware. Files and records are also Company assets, and we have a responsibility to ensure their confidentiality, security, and integrity.

Each of us is personally responsible for using these assets with care and protecting them from fraud, waste, and abuse. Your personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment. Be aware that any information you create, share, or download onto Company systems belongs to Alta, and we have the right to review and monitor system use at any time, without notifying you, to the extent permitted by law.

### Do the Right Thing

- Use Company assets to carry out your job responsibilities, never for activities that are improper or illegal.
- Observe good physical security practices, especially those related to badging in and out of our facilities.
- Be a good steward of our electronic resources and systems, and practice good cybersecurity:
  - Do not share passwords or allow other people, including friends and family, to use Alta assets.
  - Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on Company computers or other equipment to conduct Company business is prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the [IT Department](#).
  - Lock your workstation when you step away and log off our systems when you complete your work for the day.
  - Beware of phishing attempts—use caution in opening email attachments from unknown senders or clicking on suspicious links.

### Watch Out For

- Requests to borrow or use Alta equipment without approval.
- Excessive use of Alta resources for personal purposes.
- Unknown individuals without proper credentials entering our facilities.

 **Learn More**  
[Handbook, Page 81](#)

## Implementing Artificial Intelligence

We embrace new technologies, including artificial intelligence (AI), which is rapidly changing the way Alta collects, uses, and analyzes data. AI is also empowering us to give customers more efficient and personalized experiences.

Because AI learns and operates in a human-like way, issues involving discrimination, equity, and privacy can arise. That’s why it’s critical for us to use, design, and develop these tools ethically from the start. Falling short in this effort can expose us to regulatory, legal, and reputational risks. If your work involves AI, data analytics, or other digital technologies, be sure to follow all applicable laws and regulations and build new technologies ethically, fairly, and transparently.

### Do the Right Thing

- Maintain human oversight at all stages of AI use.
- Avoid AI tools and uses that could create or spread bias, discrimination, or unfair outcomes.
- Verify the accuracy of AI outputs and reference source material to minimize outdated or unreliable information.
- Protect intellectual property and confidential information, customer data, and the security of our systems—never input proprietary data into an AI tool without prior approval from the [IT Department](#) or the [Legal Department](#).



# Our Customers for Life

## Giving Gifts Responsibly

A modest gift may be a thoughtful “thank you,” or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that someone may think it is being offered in an attempt to influence a business decision.

Only offer and accept gifts and entertainment that comply with our policies, and make sure that anything you give or receive is accurately reported in our books and records.

### Government Officials

Be aware that the rules for what we may give to—or accept from—government officials are much stricter. Don't offer anything of value to a government official without obtaining approval, in advance, from [Human Resources Department](#) or [Legal Department](#). And remember: We do not accept or provide gifts, favors, or entertainment to anyone—even if it complies with our policies—if the intent is to improperly influence a decision.



### Do the Right Thing

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Never offer gifts to—or accept them from—a business partner with whom you are involved in contract negotiations.
- Make sure anything given or received complies with the Company policies of both the giver and the recipient.
- Never give or accept cash or cash equivalents.
- Do not request or solicit personal gifts, favors, entertainment, or services.
- Raise a concern whenever you suspect that a colleague or business partner may be improperly attempting to influence a decision of a customer or government official.



### Watch Out For

- Situations that could embarrass you or our Company (e.g., entertainment at sexually oriented establishments).
- Gifts, favors, or entertainment that may be reasonable for a privately owned company but not for a government official or agency.



### What If?

**Q:** When traveling, I received a gift from a business partner that I believe was excessive. What should I do?

**A:** You need to let your manager know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to team members or donate it to charity, with a letter of explanation to the donor.



### Learn More

[Gift & Hospitality Policy](#)



## Avoiding Conflicts of Interest

A conflict of interest can occur whenever an employee has an interest or activity that may interfere with their ability to make an objective decision on behalf of Alta. Conflicts of interest may be actual, potential, or even just a matter of perception.

Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, because the perception of a conflict can undermine the trust others place in us and damage our reputation. Conflict of interest situations are not always clear-cut, so fully disclose them to your manager so they can be properly evaluated, monitored, and managed.



**Learn More**

[Related Party Transaction Policy](#)

## Potential Conflicts of Interest

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

**Corporate opportunities:** If you learn about a business opportunity because of your job, it belongs to Alta first. This means that you should not take that opportunity for yourself unless you get approval from the [Human Resources Department](#) or the [Legal Department](#).

**Friends and relatives:** On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, business partner, competitor, or even our Company. Since it is impossible to anticipate every scenario that could create a potential conflict, you should disclose your situation to your manager to determine if any precautions need to be taken.

**Outside employment:** To ensure that there are no conflicts and that potential issues are addressed, always disclose and discuss outside employment or side businesses with your manager. If approved, make sure the outside activity does not interfere or compete with your work at Alta. Working for a competitor, business partner, or customer may raise conflicts that will need to be resolved.

**Personal investments:** A conflict can occur if you have a significant ownership or other financial interest in a competitor, business partner, or customer. Make sure you know what's permitted—and what's not—by our policies and seek help with any questions.

**Civic activities:** Unless Company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners, or customers, especially if your current job gives you the ability to influence our relationship with them.

**Personal Relationships:** Alta discourages inappropriate relationships between team members. You should never be in a position to make employment or business decisions that might affect family members, friends, or other close personal relationships. Always keep any relationships professional at work.



### Do the Right Thing

- Avoid conflict of interest situations whenever possible.
- Always make business decisions in the best interest of Alta.
- Think ahead and proactively address situations that may put your interests or those of a family member in conflict with Alta.
- Discuss with your manager full details of any situation that could be perceived as a potential conflict of interest.

## Working with Our Suppliers and Third Parties

Alta evaluates and engages with qualified business partners on an objective basis grounded in fairness. When selecting partners, we assess their ability to satisfy our business and technical needs and requirements. All agreements must be negotiated in good faith and fair and reasonable for both parties.

Do your part to hold our business partners to our high standards and ensure they operate ethically, in compliance with the law, and in a way that's consistent with our Code, our policies, and our [Guiding Principles](#).

## Working with the Government

We are committed to meeting the many special legal, regulatory, and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, invoicing, subcontracting, employment practices, contract performance, gifts and entertainment, purchasing, and other matters. These requirements may also flow down to individuals and companies working on our behalf.

If you are responsible for conducting business with the government on behalf of Alta, make sure you know and comply with what's contractually required as well as all laws and regulations that apply to our government-related work.



## Protecting Confidential Information

Alta relies on employees to be vigilant and protect confidential information and intellectual property—some of our most important and valuable assets. This means keeping this information secure, limiting access to those who have a need to know in order to do their job, and only using it for authorized purposes.

Do your part to safeguard confidential information. Be aware that this obligation continues even after your employment at Alta ends.

### Intellectual Property

Examples of intellectual property (IP) include:

- Business and marketing plans
- Company initiatives (existing, planned, proposed, or developing)
- Customer lists
- Trade secrets and discoveries
- Methods, know-how, and techniques
- Innovations and designs
- Systems, software, and technology
- Patents, trademarks, and copyrights

Alta commits substantial resources to technology development and innovation, and the creation and protection of our intellectual property rights are critical to our business. Contact the [Legal Department](#) if you receive questions regarding:

- The scope of our intellectual property rights
- How Alta rights apply to another company's products
- How a third party's intellectual property rights apply to Alta's intellectual property rights or products

### Do the Right Thing

- Promptly disclose to Company management any inventions or other IP that you create while you are employed by Alta.
- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- Use and disclose confidential information only for legitimate business purposes.
- Protect our intellectual property and confidential information by sharing it only with authorized parties.
- Only store or communicate Company information using Alta information systems.

### Watch Out For

- Discussions of Alta confidential information in places where others might be able to overhear—for example, on planes and elevators, in restaurants, and when using your phone.
- Sending confidential information to unattended devices or printers.

## Confidential Information: Third Parties

Our customers and business partners place their trust in us. We must protect their confidential information just as we protect our own. Make sure you understand the expectations of customers and business partners regarding the protection, use, and disclosure of the confidential information that they provide to us.

### Do the Right Thing

- Limit any access to third-party confidential information to those who have a need to know in order to do their job, and only for authorized purposes.
- Immediately report any loss or theft of confidential information to your manager.

### Watch Out For

- Requests by business partners for confidential information about our customers or about other business partners if there is no associated business requirement or authorization.
- Unintentional exposure of confidential information about our customers or business partners in public settings or through unsecure networks.

### Learn More

[Handbook, Page 71](#)



# Our Commitment to Excellence

## Keeping Accurate Records

The accuracy and completeness of our business records and financial disclosures are essential to making informed decisions and supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some team members have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that any information you record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

### Records Management

Documents should only be disposed of in compliance with Alta policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to—or in anticipation of—an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact [Human Resources, Internal Audit, or Corporate Counsel](#).



### Do the Right Thing

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all business communications. Write as though someday the records you create may become public documents.



### Watch Out For

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets, or liabilities.
- Improper destruction of documents.



### What If?

**Q:** At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing. I believe it was excessive. What should I do?

**A:** If you are questioning if this was the right thing, you should raise it up to the next level manager. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.



## Cooperating with Investigations and Audits

From time to time, team members may be asked to participate in internal and external investigations and audits that are conducted by our Company or by government officials. All team members are expected to fully cooperate with all such requests and ensure that any information provided is true, accurate, and complete. When it comes to Alta's policies and procedures, if you see an opportunity to improve or if something seems wrong, make sure you raise the concern. You can start with your manager, but you may also direct your concern directly to Internal Audit, Human Resources, or the Legal Department. If you have questions or aren't sure how to respond to an audit request, please contact Alta's Internal Audit team.

If you learn of a potential government investigation or inquiry, immediately notify your manager and [Human Resources](#) or the [Legal Department](#) before taking or promising any action. If you are directed by our Company to respond to a government official's request, extend the same level of cooperation and again, ensure that the information you provide is true, accurate, and complete.

### Watch Out For

- **Falsified information.** Never destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- **Unlawful influence.** Never provide or attempt to influence others to provide incomplete, false, or misleading statements to a Company or government investigator.
- **Retaliation.** Never allow any form of retaliatory behavior as a result of any internal or personnel investigations or claims.

## Preserving Private Data

We respect the personal information of others. We follow our policies and all applicable laws and regulations in collecting, accessing, using, storing, sharing, and disposing of sensitive information.

Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, or credit card number. Only use personal information—and share it with others outside of Alta—for legitimate business purposes.

### Watch Out For

- Failing to shred or securely dispose of sensitive information.
- Using “free” or individually purchased internet hosting, collaboration, or cloud services that could put personal information at risk.

### Learn More

[Handbook, Page 11](#)



## Communicating with the Public

Alta is committed to maintaining honest, professional, and lawful internal and public communications. We need a consistent voice when making disclosures or providing information to the public, and must ensure that only authorized persons speak on behalf of Alta.

Refer any communications with the media, investors, stock analysts, and other members of the financial community to executive management.

### Full, Fair, and Timely Disclosures

Alta is committed to meeting its obligations of full, fair, and timely disclosure in all reports and documents that describe our business and financial results, and other public communications.

### Watch Out For

- Giving public speeches or writing articles for professional journals or other public communications that relate to Alta without appropriate management approval.
- The temptation to use your title or affiliation outside of your work for Alta without it being clear that the use is for identification only.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about Alta or its customers or business partners.

## Social Media

Every communication about our Company affects our reputation and our brand, so we take care online. We must never post anything that would be considered harassing or discriminatory, and we must never breach confidential information about our Company, our team members, or our business partners.

If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Alta. If you believe a false statement about our Company has been posted, do not respond, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact [Human Resources](#), [Marketing / Corporate Communications](#), or [Corporate Counsel](#).



### Learn More

[Handbook, Page 71](#)



## Following Anti-Corruption and Bribery Laws

Alta is committed to complying with all applicable anti-corruption laws. We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs.

Do not pay or accept bribes or kickbacks, at any time for any reason. This applies equally to any person or company representing our Company. Our partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions. Never ask them to do something that we are prohibited from doing ourselves.

### Key Definitions

**Bribery** means giving or receiving anything of value (or offering to do so) to obtain a business, financial, or commercial advantage.

**Corruption** is the abuse of an entrusted power for private gain.

**Facilitation payments** are typically small payments to a low-level government official that are intended to encourage them to perform their responsibilities.

**Government officials** include government employees, political parties, candidates for office, employees of public organizations, and government-owned entities.

### Do the Right Thing

- Understand the standards set forth under anti-bribery laws that apply to your role at Alta.
- Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- Exercise due diligence and carefully monitor third parties acting on our behalf particularly when dealing in countries with high corruption rates and in situations where “red flags” would indicate further screening is needed.
- Accurately and completely record all payments to third parties.

### Watch Out For

- Apparent violations of anti-bribery laws by our business partners.
- Agents who do not wish to have all terms of their engagement with Alta clearly documented in writing.

### What If?

**Q:** A potential new customer is asking if we can get him tickets to the Super Bowl. I think that if we get him the tickets, we would win his business. What should I do?

**A:** This should be reported to the [Sales Department or the Legal Department](#) for investigation. If there is bribery and we fail to act, both you and Alta could be liable. Investigating these kinds of situations can be difficult, but anyone doing business with us should understand the necessity of these measures. It is important and appropriate to remind them of this policy.

### Learn More

[Handbook, Page 17](#)



## Avoiding Insider Trading

We respect every company's right to protect its material, nonpublic ("inside") information, and we comply with insider trading laws.

In the course of business, you may learn confidential information about Alta or about other publicly traded companies that is not available to the public. Trading securities while aware of inside information, or disclosing it to others who then trade ("tipping"), is prohibited by various laws and our policies.

### Material Information

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- A proposed acquisition or sale of a business
- A significant expansion or cutback of operations
- A significant product development or important information about a product
- Extraordinary management or business developments
- Changes in strategic direction such as entering new markets

### Do the Right Thing

- Do not buy or sell securities of any company when you have material nonpublic information about that company.
- Protect material nonpublic information from the general public including information in both electronic form and in paper copy.
- Discuss any questions or concerns about insider trading with the [Legal Department](#).

### Watch Out For

- Requests from friends or family for information about companies we do business with or have confidential information about. Even casual conversations could be viewed as illegal "tipping" of inside information.
- Sharing material nonpublic information with anyone, either on purpose or by accident, unless it is essential for Alta-related business. Giving this information to anyone else who might make an investment decision based on your inside information is considered "tipping" and is against the law regardless of whether you benefit from the outcome of their trading.

### Learn More

[Handbook, Page 29](#)



## Competing Fairly

We believe in free and open competition and never engage in practices that may limit competition or try to gain competitive advantages through unethical or illegal business practices.

Do not engage in conversations with competitors about competitively sensitive information or engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets. Antitrust laws are complex and compliance requirements can vary depending on the circumstances, so seek help with any questions about what is appropriate and what isn't.

### Be Alert to Anti-Competition Warning Signs

In general, the following activities are red flags, should be avoided, and, if detected, reported to the [Legal Department](#):

- Sharing our Company's competitively sensitive information with a competitor.
- Sharing competitively sensitive information of business partners or other third parties with their competitors.
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.

### Watch Out For

- **Collusion**—when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- **Bid-rigging**—when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- **Tying**—when a company with market power forces customers to agree to services or products that they do not want or need.
- **Predatory pricing**—when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

### What If?

**Q:** We recently hired a new employee from the competition.

I think they have some information on a quote for a new equipment bid that we are competing for. Should I ask what they know? It could get us the inside track on the bid.

**A:** You should contact [Sales Leadership](#) or the [Legal Department](#) without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.



# Our Community

## Fulfilling Our Responsibility to the World

Corporate social responsibility is an integral part of Alta's culture. We believe in making a positive difference in people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a Company, we contribute funds, time, and talent to support Company-wide programs and local causes. We encourage (but do not require) you to participate in the many initiatives we support. This is why we created Alta Cares.

## Contributing Outside the Workplace

Alta also encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and consistent with our policies and that you're participating on your own time and at your own expense.

### Watch Out For

- Putting pressure on colleagues to participate in personal charitable or volunteer activities.
- Using Alta funds, assets, or the Alta name to further your personal volunteer activities unless you receive approval in advance.

## Political Involvement

Everyone has the right to voluntarily participate in the political process, including making personal political contributions. However, as employees, we must always make it clear that our personal views and actions are not those of Alta.

Make it clear that your political views and activities are your own. You don't represent Alta.

### Do the Right Thing

- Ensure that your personal political views and activities are not viewed as those of the Company.
- Do not use our resources or facilities to support your personal political activities.
- Follow all federal, state, local, and foreign election laws, rules, and regulations as they relate to Company contributions or expenditures.

### Watch Out For

- **Lobbying.** Interactions with government officials or regulators that could be seen as lobbying must be discussed in advance and coordinated with the [Legal Department](#).
- **Pressure.** Never apply direct or indirect pressure on another team member to contribute to, support, or oppose any political candidate or party.
- **Improper influence.** Avoid even the appearance of making political or charitable contributions in order to gain favor or in an attempt to exert improper influence.
- **Conflicts of interest.** Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at Alta.

### What If?

**Q:** I will be attending a fundraiser for a candidate running for local office. Is it OK to mention my position at Alta as long as I don't use any Company funds or resources?

**A:** No. It would be improper to associate our name in any way with your personal political activities.

**Q:** I would like to invite an elected official to speak at an upcoming Company event. Would that be a problem?

**A:** You must get approval from the [Human Resources Department](#) or the [Legal Department](#) before inviting an elected official or other government official to attend a Company event. If the invitee is in the midst of a reelection campaign, the Company event could be viewed as an endorsement of the candidate. Depending on local laws, any food, drink, or transportation provided to the invitee could be considered a gift. In most cases, there would be limits and reporting obligations.

 **Learn More**  
[Handbook, Page 13](#)

## Honoring Our Environment

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of team members, customers, and the public.

Protect team member safety and the environment. Read and understand all the information provided by our Company that is relevant to your job and operate in full compliance with environmental, health, and safety laws and regulations.

### Do the Right Thing

- Fully cooperate with environmental, health and safety training, and with our Company's periodic compliance reviews of our products and operations.
- Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- Provide complete and accurate information in response to environmental, health, and safety laws, regulations, and permits.
- Be proactive and look for ways we can minimize waste, energy, and use of natural resources.
- Contact the [Health, Safety, and Environmental \(HSE\) Department](#) if you have any questions about compliance with environmental, health and safety laws, and policies.

## Protecting Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking.

Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking, and forced labor.

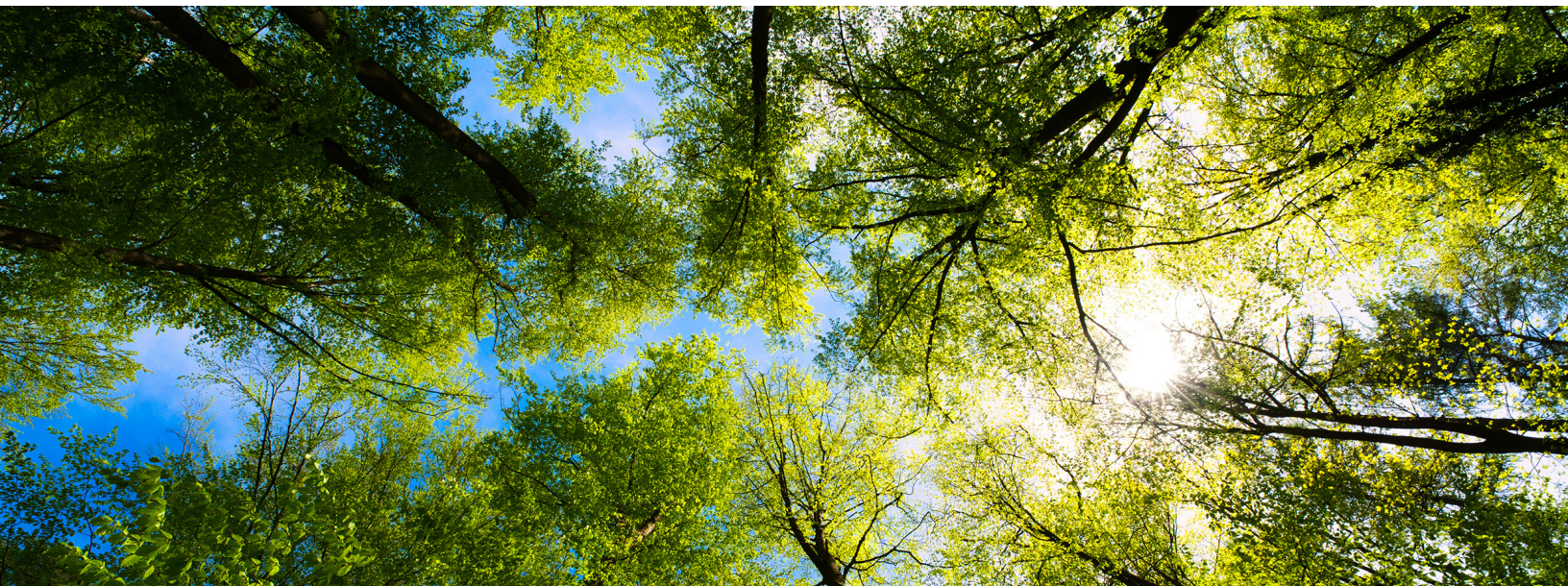
### Do the Right Thing

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers.
- Remember that respect for human dignity begins with our daily interactions with one another, our business partners, and our customers. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

### What If?

- Q:** I saw a story posted on social media about one of our suppliers. It suggested that they may have been involved in an incident related to unfair labor practices. Since it hasn't been proven and it doesn't directly involve Alta, do I need to take any action?
- A:** Yes. We hold our suppliers accountable to our values, and if there is a suggestion of improper behavior, you should report your concern. Even if there is no direct connection between the allegations and the work they do with us, we should know what is going on so we can evaluate how to proceed.

 **Learn More**  
[Handbook, Page 9](#)



# Helpful Resources

Do you need additional guidance? Alta has a variety of resources to contact for help:

Issue or concern	Contact
To ask questions, report potential misconduct, or other ethical concerns	Your manager/supervisor or a member of senior management <a href="#">Human Resources Department</a> <a href="#">Legal Department</a> The Hotline, accessible at <a href="#">EthicsPoint</a>
For legal questions	<a href="#">Legal Department</a>
To view Company policies	Visit the <a href="#">Alta Employee Handbook through Dayforce</a> or <a href="#">The News You Can Use</a>
For media inquiries	<a href="#">Marketing / Corporate Communications Department</a>
For information security inquiries	<a href="#">IT Department</a>
For general security concerns	<a href="#">Human Resources Department</a>