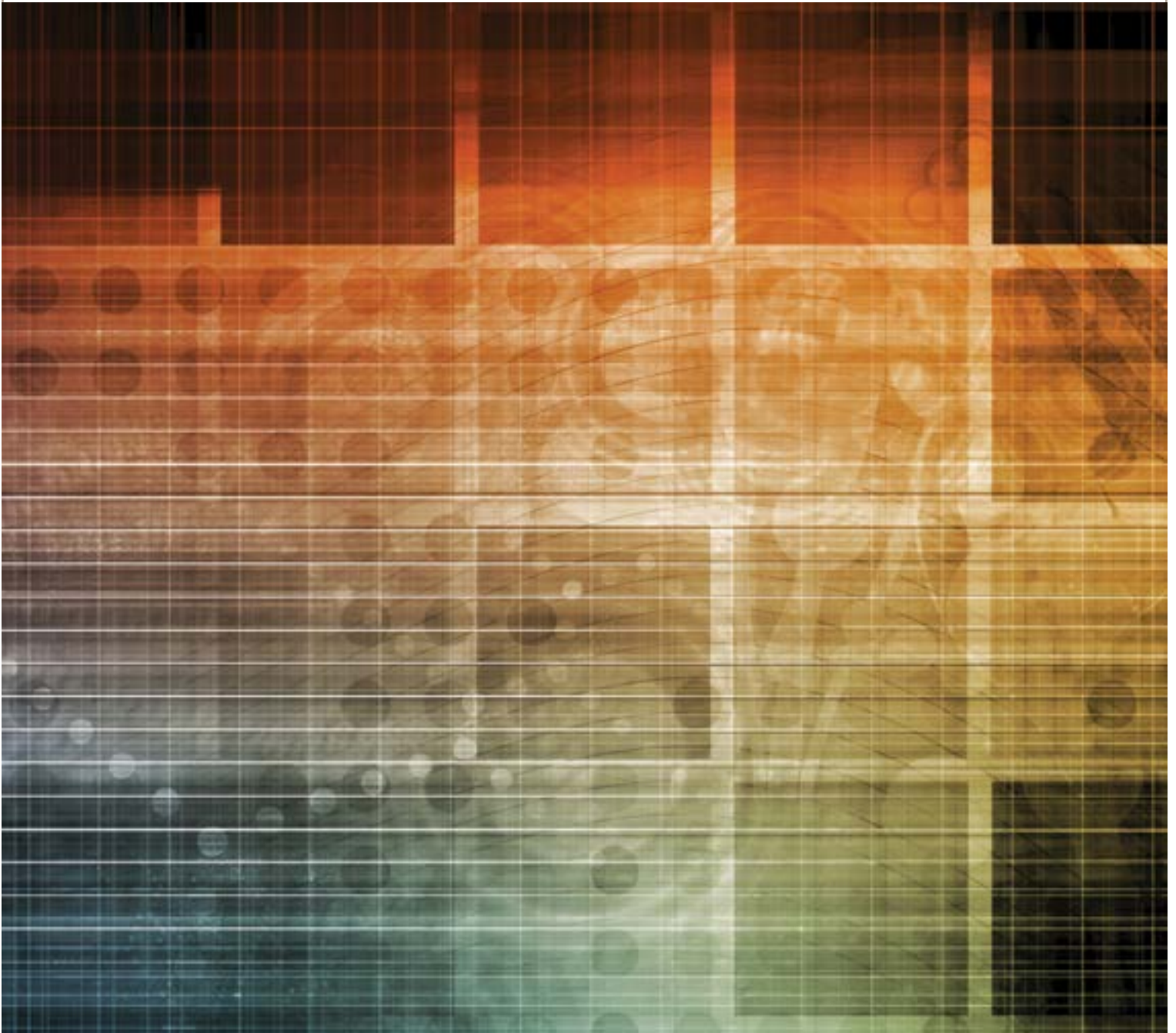


# Business Ethics

## Code of Conduct



ATK is a registered trademark of Alliant Techsystems Inc.

**Do Right**  
COMPLIANCE & ETHICS

# A Message from Our CEO



**“We all have a shared responsibility to maintain high ethical standards and to ensure that ATK is a place where we are proud to work.”**

## **Dear ATK Employee:**

At ATK, ethics is not just a slogan – it’s a way of life. We are firmly committed to conducting our operations ethically and in compliance with the laws and regulations that govern our business. The way we conduct business with our co-workers, customers, suppliers, competitors and regulatory agencies, and within our communities, shapes our corporate reputation – one of the most important assets we have. At ATK, we emphasize that no success is worth the expense of compromising our integrity. As a result, our customers, partners and stockholders continue to trust our products and services.

Our ATK Business Ethics Code of Conduct should be used as a tool to help you make the right decisions and resolve ethical issues you may encounter. I encourage you to read the Code of Conduct and refer to it often. Leaders, managers and supervisors should lead by example and help employees follow the Code by addressing questions about it and seeking additional assistance when needed. We all have a shared responsibility to maintain high ethical standards and to ensure that ATK is a place where we are proud to work.

If you are faced with an ethical dilemma or think that the Code of Conduct is being violated – or if you are unsure or have a question – we ask you to speak up. There are resources available to provide guidance on doing the right thing. We encourage you to talk to your supervisor or manager, human resources, a legal advisor, an ethics committee representative, or the Corporate Ethics and Compliance Office. You may also share your concerns through ATK’s Ethics Helpline at **1-800-345-8594** or online at [www.atkethics.com](http://www.atkethics.com).

Thank you for your commitment to our Code of Conduct and ATK’s values. I encourage you to act the right way, every day. Together we’ll make sure ATK retains our reputation for integrity and success.

A handwritten signature in dark ink, appearing to read 'M. DeYoung', written over a light-colored background.

**Mark W. DeYoung**

# Our Values

**Our values focus and align us as a company. They form the foundation for our behavior, how we conduct business, make decisions and treat others. We are trusted, innovative, persistent, execution focused, patriotic and generous in our giving.**

## **Safety is a core element of our culture.**



It is part of our DNA; it is in everything we do. We are committed to safe operations and are diligent in our safety practices and processes.

## **People are our most important asset and our greatest competitive advantage.**



We believe our people drive our success. We want an accountable and engaged workforce. We desire to attract and retain the very best and we pay for performance. We hold

our leaders and employees accountable for developing future talent. We seek a diverse workforce rich in talent, background, ideas and experience.

## **Customers depend on what we deliver.**



We treat customers with respect and dignity. We build relationships through our performance. We deliver mission-essential

products that must perform each and every time.

## **Execution excellence drives our culture of success.**



We deliver high-quality, innovative and affordable products through a disciplined, process-driven approach.

We drive efficiencies through continuous improvement in our processes and procedures. We build relationships through our performance.

## **Patriotism is embedded in our culture.**



We support and give back to our troops and their families by contributing to organizations and causes that benefit them.

## **Corporate responsibility means integrity in everything we do.**



We insist upon ethical behavior, environmental stewardship and a focus on safety. We give back to the communities where we operate. Being a good corporate

citizen benefits our customers, our employees and our businesses. It reinforces the attractiveness of our brands and products, and it is the right thing to do.

# Table of Contents

## Using ATK's Business Ethics Code of Conduct ... 6

Why It Is Important to Follow ATK's Code of Conduct .....	7
Persons Covered by ATK's Code .....	7
How to Use the Code.....	7
Doing Business Around the Globe .....	7
No Waivers .....	7

## A Culture of Ethics and Compliance ..... 8

Duty to Comply.....	9
Speaking Up .....	9
Contacting the Corporate Ethics and Compliance Office .....	10
Contacting the Ethics Helpline .....	10
Employee and Supervisor Responsibilities .....	11
Protection Against Retaliation .....	11
Conducting Ethics Investigations .....	12
Corrective or Disciplinary Action .....	12

## How We Act in the Workplace ..... 13

Proprietary Information .....	14
Access, Use and Protection of Proprietary Information.....	14
Intellectual Property .....	15
Proprietary Information of Competitors and Prior Employers .....	15

Accurate Time Charging and Reporting.....	15
Fair Treatment and Respect.....	16
Harassment and Discrimination .....	16
Diversity .....	16
Accommodating Disabilities .....	16
Safety in the Workplace .....	17
Safety Procedures .....	17
Bullying and Workplace Violence .....	18
Drugs and Alcohol .....	18
Protecting Personal Information.....	18
Avoiding Personal Conflicts of Interest.....	19
Personal or Family Financial Interests.....	19
Outside Employment.....	19
Business Opportunities .....	19
Service in Other Organizations .....	20
Nepotism .....	20
Responsible Use of Social Media .....	20
ATK's Social Media Policy.....	20
Commenting on ATK's Products.....	21
Using ATK Technical Resources to Access Social Media.....	21
Official ATK Social Media Channels.....	21

Responding to Inquiries from the Media and Investment Community.....22

Appropriate Political Activity and Lobbying.....22

**How We Interact with our Customers and in the Marketplace .....23**

Antitrust, Sales Practices and Fair Dealings .....24

Accurate Business Records, Financial Reporting and Record Management .....25

    Recordkeeping .....25

    Financial Reporting .....25

    Truth and Accuracy in Reporting .....26

    Retaining and Destroying Company Records.....26

Avoiding Insider Trading and Tipping.....27

Product Quality and Safety.....28

Vendors and Suppliers, Selection and Fair Dealing .....28

    Selection of Suppliers .....28

    Fair and Transparent Dealings .....29

    Business Conduct Standards.....29

    Corporate Responsibilities and Citizenship.....29

    Avoidance of Counterfeit Parts.....29

Doing Business with the Government .....30

No Bribery or Corruption .....32

Gifts, Hospitality and Entertainment.....33

    Guidelines When Dealing with Government Officials and Employees .....33

    Guidelines When Dealing with Suppliers .....33

    Guidelines When Receiving Business Courtesies .....33

Compliance with Export and Import Controls .....34

Environmental Compliance and Stewardship.....35

**How We Use Our Resources and Assets.....36**

Responsible Use of ATK and Customer Assets.....37

Protecting our Technologies.....38

    ATK’s Information Security Policies .....38

    Insider Threats .....38



# Using ATK's Business Ethics Code of Conduct



Be sure you know and follow  
ATK's Code of Conduct and the  
policies that apply to your work

## Why It Is Important to Follow ATK's Code of Conduct

We all want ATK to be successful. The way in which we conduct ourselves is equally important to the results we achieve. We must never compromise our integrity or ethics to achieve results. This is why we have an ethics and compliance program that helps define ATK's commitment to legal and ethical conduct.

Our Business Ethics Code of Conduct summarizes the standards that govern how we conduct our business. This Code is a common-sense guide to help raise your awareness of legal and ethical issues and understand the process in place for dealing with those issues.

## Persons Covered by ATK's Code

This Code applies to everyone at ATK. Each ATK employee, officer and director is expected to read, understand and follow our Code. We also expect our suppliers, vendors, contractors and business partners to follow our Code and support effective compliance programs within their own organizations.

## How to Use the Code

Our Code cannot address all situations, but it will help you:

- ▶ Follow and apply the policies, laws and regulations that govern your work
- ▶ Resolve difficult questions about on-the-job conduct
- ▶ Get advice
- ▶ Bring to our attention suspected noncompliant or unethical behavior



## Doing Business Around the Globe

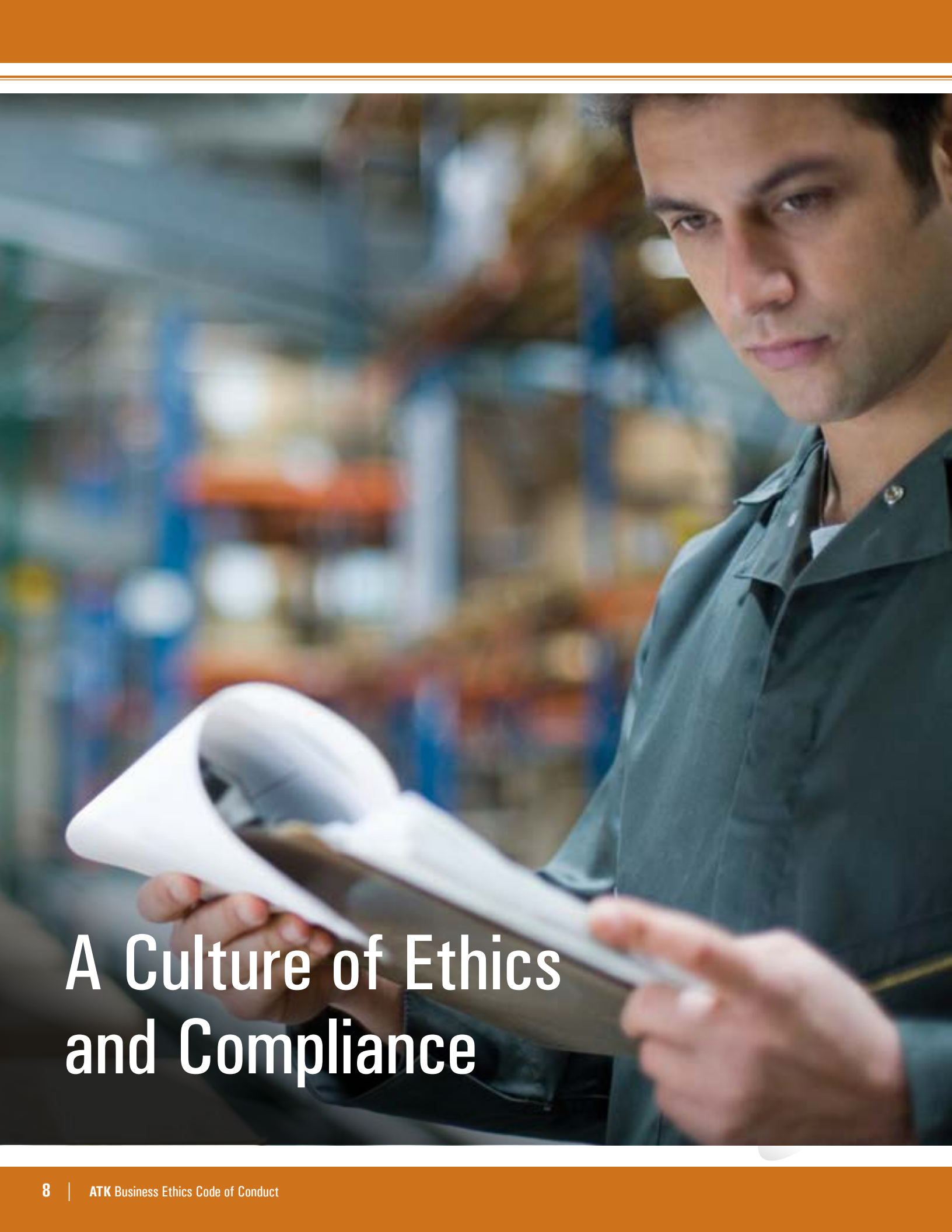
ATK conducts business in the United States and internationally. We are subject to the laws, rules and regulations of the United States, including anti-bribery laws such as the Foreign Corrupt Practices Act which applies to all of our operations, and the laws of the countries where we do business. Our Code reflects our commitment to obey the laws, rules and regulations wherever we work and to respect the principles upon which they are based.

In some instances, there may appear to be a conflict between the laws of two or more countries. If you have a question about the right course of action to take, contact your ATK Legal Advisor, or you may call the Corporate Ethics and Compliance Office at **(952) 351-2923**.

Just because the laws may be complicated or difficult to follow does not excuse any of us from complying.

## No Waivers

ATK does not permit waivers of our Business Ethics Code of Conduct.



# A Culture of Ethics and Compliance



## Duty to Comply

✓ | It all starts with you

Obeying the law is the foundation on which we have built our standards. All of us must respect and obey the laws, rules and regulations of the locations and countries where we operate. We must also know and abide by any customer-imposed rules affecting our behavior. Finally, we must abide by ATK's policies. Complying with laws, rules, regulations and policies is not our only responsibility. We should consider not only what we are permitted to do, but also "the right thing to do" for each situation.

## Speaking Up

✓ | Bring your concerns into the open to resolve problems quickly and to prevent more harm

Most of us have faced a difficult situation where the right course of action is hard to determine. Perhaps the facts are complex or a good choice is just not obvious. Maybe we do not have the information we need to make a good choice. Perhaps our personal interests are inconsistent with the best interests of ATK.

When you understand our expectations for legal and ethical conduct, you will be able to handle most situations. Using this Code will help you in many circumstances. However, it will not give you an answer for every situation. No code of conduct can do that. Therefore, whenever you are in doubt, you should always speak up and discuss your ethics questions or concerns with someone.

Every supervisor and manager is expected to keep an "open door" and to provide timely advice on ethical or compliance concerns. If you are comfortable doing so, we encourage you to involve your supervisor or manager. We understand that at times this may not be practical or appropriate. In these situations, you have other resources you can turn to, including:

- ▶ An Ethics Committee Representative
- ▶ Your Human Resources Department
- ▶ An ATK Legal Advisor
- ▶ ATK's Corporate Ethics and Compliance Office at **(952) 351-2923**
- ▶ ATK's Ethics Helpline at **1-800-345-8594** or **[www.atkethics.com](http://www.atkethics.com)**

Situations where you "just do not feel comfortable" or when someone asks or instructs you "not to say anything" should always be reported.



## Contacting the Corporate Ethics and Compliance Office

✓ **By reporting concerns, you help us investigate matters and fix problems**

Our Corporate Ethics and Compliance Office is a company-wide resource to assist you in finding help with your business ethics and compliance concerns or questions. ATK's Corporate Ethics and Compliance Office is part of ATK's Legal Department and provides reports on ethics and compliance matters to the independent Audit Committee of ATK's Board of Directors.

- ▶ If you have a question, want to voice a concern, or report a possible violation of law or our policies, you can contact the Corporate Ethics and Compliance Office at **(952) 351-2923**. This office can provide you with advice. You may also request anonymity.

## Contacting the Ethics Helpline

✓ **Ethics Helpline: 1-800-345-8594 or [www.atkethics.com](http://www.atkethics.com)**

You can also report ethics or compliance concerns using our Ethics Helpline. The Ethics Helpline is operated by a trusted third-party provider located in the United States and is available 24 hours a day, 7 days a week, and 365 days a year.

You can contact the Ethics Helpline either by phone or through our website. If you choose to call, an independent third party will take your call, listen and ask questions about your concern.



Whether you call or log-in, you will receive a unique reference number so that you may follow up later. A report of your concern will be promptly forwarded to our Corporate Ethics and Compliance Office for action. You may call back or log-in at a later date to check on the status of your concern, to provide additional information, or to answer any follow-up questions an ethics investigator may have left for you in the event that you chose to remain anonymous.



- ▶ You report your concern
- ▶ We receive your concern
- ▶ We investigate your concern
- ▶ We take appropriate action

All contacts with the Ethics Helpline are confidential to the extent possible. When you use the Ethics Helpline, you may choose to remain anonymous. Sometimes, however, it may become necessary to know your identity in order to resolve your concerns and you will be advised when that is the case. Depending on the nature of a concern, management and the leaders of ATK may need to be advised about the issue, but care will be taken to protect identities and sources of information to the extent possible. Our goal is to answer questions and to handle issues fairly and consistently. We will make sure that reports of improper conduct are thoroughly investigated. We will take appropriate action to resolve each matter reported in good faith.

Accounting, financial and auditing concerns may also be reported to the Audit Committee of ATK's Board of Directors at **[boardofdirectors@atk.com](mailto:boardofdirectors@atk.com)**.

## Employee and Supervisor Responsibilities

✓ We all have a responsibility to “do the right thing,” no matter our role at ATK

Supervisors and managers should never pressure anyone to perform their duties contrary to the ethical standards described in our Code. Employees should not submit to pressure from any supervisor, manager, other employee or third party to act contrary to the provisions of our Code. If you are ever asked or instructed to perform anything that may be unethical or a violation of the Code, or if you observe someone not following the principles of the Code, you should report it immediately to one of the resources identified in the section titled “Speaking Up.”



## Protection Against Retaliation

✓ It is ATK's obligation to protect you from retaliation

It is important to remember that ATK will not tolerate any retaliation against anyone who speaks up in good faith to ask a question, report a concern, or participate in an ethics or compliance investigation.

When you step forward to report something that you believe is unethical or illegal, we will investigate and address the problem. Individuals who raise concerns in good faith or who help to resolve reported matters are protected against retaliation. Good faith does not mean that you are always right. It does mean that you sincerely believe a legitimate issue exists.

Retaliation is the act of making someone afraid to speak up or come forward, or an action taken against someone for reporting a concern. Any person found to have engaged in retaliation will be subject to disciplinary action up to and including termination. In addition, malicious and false reports of unethical or illegal conduct will not be tolerated and individuals who make these types of reports will face disciplinary action.

If you discover any retaliation in the workplace, you should report it immediately to the Corporate Ethics and Compliance Office at **(952) 351-2923**.

## Conducting Ethics Investigations

✓ **If requested, you have a responsibility to cooperate in an ethics investigation**

All concerns that are reported in good faith are taken seriously. We have an ethics investigation process that we use as a guide for our ethics investigations throughout ATK. If your concern results in an ethics investigation, a trained ethics investigator will be assigned to conduct an impartial and thorough investigation. The ethics investigator will contact those involved in the situation and provide them with an opportunity to explain what happened. If involved, you have a responsibility to cooperate with the investigation. During an investigation, you should be truthful, cooperative, and should preserve all relevant documents and information (including electronic documents and emails).

In addition, everyone is expected to fully cooperate with government investigations and be courteous to government officials. You should notify your supervisor or manager, and your location ATK Legal Advisor, immediately if you learn about a government investigation or request for information. If you are contacted by a government representative, you should inform the government representative that it is ATK's policy to cooperate, but that ATK must be advised first.

## Corrective or Disciplinary Action

✓ **We are all accountable for our actions while carrying out our duties and responsibilities at ATK**

Violations of legal requirements, our policies or this Code may have severe consequences to you and ATK, such as significant fines, penalties and a damaged reputation. Violations may jeopardize our relationships with customers and suppliers and could result in the loss of our ability to do business. Anyone who violates laws, regulations, our policies or this Code is subject to disciplinary action up to and including termination.



# How We Act in the Workplace

## Proprietary Information

✓ **Do not misuse or access proprietary information when not permitted to do so**

During your employment with ATK, you will have access to proprietary information and trade secrets of ATK and our partners, vendors, customers, suppliers and other third parties. This includes, but is not limited to:

- ▶ Business proposals and pricing
- ▶ Customer and supplier information
- ▶ Manufacturing methods
- ▶ Engineering designs or other product data
- ▶ Inventions or improvements any employees make in the course of their work at ATK
- ▶ Advice from legal counsel
- ▶ Other sensitive information that is not publicly available

All of us must act responsibly when it comes to the access, use, handling and disclosure of proprietary information in order to ensure the information is used only for ATK's legitimate business purposes and is not disclosed to others without authorization. This duty exists not only while you are an ATK employee, but even after you leave ATK.

### Access, Use and Protection of Proprietary Information

ATK's proprietary information must be used only for legitimate ATK business purposes. This includes information or data that you develop in your work for ATK. You may not use ATK's proprietary information for your own personal benefit or to benefit a third party.

For your own protection and to protect ATK, you should only access the information you are authorized and required to access to do your job. In addition, you may not disclose ATK's proprietary information to anyone either inside or outside of ATK without authorization. Do not assume that a co-worker has authorization to all information that you possess; seek advice from a supervisor or manager before making any disclosures.



## Intellectual Property

Intellectual property refers to creations of the mind, for which exclusive rights are recognized, such as patents, trademarks, copyrights, trade secrets and know-how. You must never share ATK's intellectual property without authorization. You must also respect the intellectual property rights of others. Theft or misappropriation of trade secrets is a federal crime and is illegal under the laws of every state and other countries.

## Proprietary Information of Competitors and Prior Employers

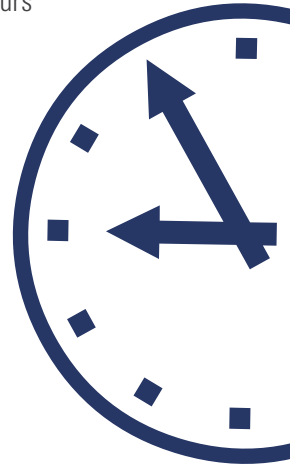
Just as ATK values and protects our own proprietary information and that of our partners, customers and suppliers, we also respect the proprietary information of our competitors. You may not bring or use proprietary information belonging to a former employer in your work at ATK. Likewise, you may not take or use proprietary information that belongs to ATK after you leave.

## Accurate Time Charging and Reporting

### ✓ Record your working time accurately

Each of us is responsible for ensuring that we report all time worked accurately and according to Company and location policy. Accurate time reporting includes:

- ▶ Recording all hours worked, including hours worked offsite and in off-hours
- ▶ Recording only actual hours worked
- ▶ Recording paid time off
- ▶ Recording time to the appropriate project or contract, where applicable
- ▶ For supervisors or managers, ensuring that your subordinates' time charging is accurate, complete and done in a timely manner



Falsely reporting time, or charging time to the wrong project or contract, violates ATK policy and compromises the integrity of ATK's books and records.



**Q:** Mike has left employment at ATK and has accepted employment with XYZ Company. XYZ Company manufactures similar products to ATK. Mike notices that their manufacturing process could benefit from some improvements. Mike was part of a project team at ATK and he and others identified some great ideas to improve the manufacturing process. Mike is excited to share his ideas with his new supervisor at XYZ Company. Is it okay for Mike to do this?

**A:** No. ATK's manufacturing processes are proprietary information and Mike may not use or disclose such information to anyone, including his new employer.

**Q:** I am working on two different contracts. My supervisor told me not to worry about tracking individual time to each project and to just charge half of my day to each contract, since it will even out over time and will make the accounting more efficient. Is this okay?

**A:** No. You should charge your time accurately to each project according to your location's time charging policies.

## Fair Treatment and Respect



**Working together respectfully and inclusively is key to our success**

At ATK, our number one resource is our people. We are committed to creating and maintaining a workplace that drives the success of ATK by working together respectfully and inclusively. Employees are at their best when they are free to openly express diverse opinions and ideas in a supportive and collaborative environment.

### Harassment and Discrimination

ATK maintains an Anti-Discrimination and Offensive Behavior Policy that prohibits behavior that singles out an employee or group of employees for negative treatment because of their gender, race, color, national origin, ancestry, citizenship, religion, age, physical or mental disability, medical condition, sexual orientation, gender identity or gender expression, veteran or marital status or other protected characteristic. Each of us has the right to be free from improper or offensive conduct at work. All employment decisions such as those related to hiring, promotion, discipline, pay, development and termination must be made based on legitimate business reasons and performance.

### Diversity

ATK strives to be the employer of choice in the communities where we operate. We understand that attracting and retaining a diverse workforce is critical to business success because it fuels our ability to creatively respond to emerging needs for new technology and product development. ATK maintains a Commitment to Equal Employment Opportunity Policy and we value the diversity of background, culture and



beliefs that our employees bring to ATK and we are proud that our workplace offers equal opportunity for advancement, personal development and professional growth.

### Accommodating Disabilities

At ATK, we are committed to providing reasonable accommodations to qualified applicants and employees with disabilities as required by the Americans with Disabilities Act, as amended, and any applicable state or local law. Any employee who requires an accommodation in order to perform the essential functions of his or her job should contact his or her supervisor or manager or Human Resources Department to request such an accommodation.



## Safety in the Workplace



**At ATK we are committed to safe operations and are diligent in our safety practices and processes**

ATK is firmly committed to providing a safe work environment. This is only possible with the support and participation of every employee at all levels of the organization. The nature of our business requires a high level of safety awareness and a disciplined approach to operations.

### Safety Procedures

As an ATK employee, you must:

- ▶ Take responsibility for your personal safety as well as the safety of your fellow employees
- ▶ Promptly identify and report all potential hazards in the work environment
- ▶ Follow all policies, procedures and work instructions
- ▶ Identify any possible changes or improvements to your supervisor or manager

- ▶ Stop operations if you are unsure of the work instructions or see something that is unsafe
- ▶ Eliminate distractions and maintain focus on the task at hand
- ▶ Only perform work tasks that you are trained and authorized to perform

Working safely is a condition of employment at ATK and it is your responsibility to always work safely while keeping a watchful eye on your surroundings and co-workers.



**Q:** One of my co-workers frequently takes short cuts and does not follow her job procedures. I do not think it is my place to say anything, as I do not want to get anyone in trouble. Should I speak up?

**A:** Yes. Every ATK employee is responsible for safety. By not speaking up, you risk endangering the employee and possibly everyone else in the work group. If you feel you cannot approach your co-worker, you need to promptly notify your supervisor or manager, or location Safety Representative, so that corrective action can be taken, or call the Ethics Helpline at 1-800-345-8594.

## Bullying and Workplace Violence

ATK does not tolerate bullying, intimidation, threats or physical violence in the workplace. ATK takes very seriously any conduct or behavior that threatens the safety of our employees. Anyone engaging in conduct that is unsafe or violent toward other employees or ATK's property will be immediately removed from the workplace.

## Drugs and Alcohol

ATK maintains a Drug Free Workplace Policy and is committed to maintaining a work environment that is free from illegal drugs and the influence of drugs and alcohol. ATK prohibits the unlawful possession, use, purchase, sale or distribution of any controlled substance on any of ATK's operated premises, in vehicles used for ATK business, or anywhere else while working on ATK business. You must not consume, possess or be under the influence of drugs or alcohol while on ATK's premises, in ATK's vehicles, or during ATK's business or working time.

## Protecting Personal Information



**We must protect and safeguard the personal information we use in our business**

At ATK, we value the trust that our employees, customers and others place in us. To maintain that culture of trust, we respect the privacy rights and interests in personal information that is collected, held and used in our business. Personal information includes (but is not limited to) employee personnel records, medical records, Social Security numbers, home addresses, telephone numbers and benefits information. Everyone who handles personal information as part of their job must do so only on a "need to know" basis and for legitimate business purposes. We all have a duty to protect and safeguard personal information in accordance with ATK policies. We should never use personal information for an unauthorized purpose or for personal gain.



**Q:** My supervisor has the quickest temper of anyone I have ever met. At times he yells and swears at my co-workers and me at the top of his voice. Do we need to put up with this?

**A:** No. Everyone is entitled to work in a workplace that is free from intimidation, bullying, and hostile or offensive behavior. You should promptly discuss the situation with your Human Resources Department, or call the Ethics Helpline at 1-800-345-8594.

**Q:** I received a call requesting personal information about an employee. I did not recognize the caller's name. Even though the caller said she was in Human Resources I was not comfortable giving her the employee's personal information, so I didn't. Did I do the right thing?

**A:** Yes. Personal information must be safeguarded and protected from improper disclosure. When you get a request for such information, you must verify that the person requesting the information is authorized to receive it for the intended purpose. Discuss this with your supervisor or manager prior to releasing the personal information.

## Avoiding Personal Conflicts of Interest



**Put ATK first to help avoid possible conflicts of interest**

We all have a duty to act in the best interests of ATK. Putting ATK first means protecting ATK's reputation and our stockholders' investment in ATK by avoiding situations that create, or appear to create, a conflict between your personal interests and what is best for ATK. If you believe that you or another employee may have a possible conflict of interest you should discuss it with an ATK Legal Advisor or the Corporate Ethics and Compliance Office who will determine whether any additional action is required.

### Personal or Family Financial Interests

You should disclose any financial interests that you or an immediate family member or member of your household has in a competitor, customer, subcontractor, distributor or supplier of ATK to an ATK Legal Advisor or the Corporate Ethics and Compliance Office who will determine whether any additional action is required. You should not pursue a business relationship or be involved in awarding business to an entity in which you or a member of your family or household member has a significant financial interest.

### Outside Employment

Before you accept outside employment or even a volunteer position, consider carefully whether the outside activity will create a conflict of interest with your work at ATK. Generally speaking, working for or providing services to any ATK customer, subcontractor, distributor, competitor or supplier may pose a personal conflict of interest and must be approved by your ATK Legal Advisor or the Corporate Ethics and Compliance Office. Even where outside employment or activities are approved, they must never interfere with your job responsibilities at ATK. Putting ATK first means giving your work at ATK your full attention.

### Business Opportunities

If you become aware of a business opportunity that may be of interest to ATK, you may not divert that opportunity for your own personal gain or for the benefit of another company. Also, you may not use your position with ATK, or ATK customer information or property, in competition with ATK, either directly or indirectly.



**Q:** My brother-in-law runs a temporary employment agency. I recommended to my manager that we should engage this agency as one of our preferred suppliers of engineering talent. I did not mention that my brother-in-law owns the company, as it did not seem relevant. Did I do the right thing?

**A:** No. Even if you do not believe that you are influenced by your personal relationship with a contact at a supplier, you are still required to disclose that information to your manager and remove yourself from the solicitation process. Remember, perceived conflicts of interest can damage ATK's reputation as much as actual conflicts of interest.

## Service in Other Organizations

Serving as a director, officer or other member of an outside organization, including for-profit and not-for-profit boards, technical advisory boards, government boards and professional organizations can create a personal conflict of interest, even if you receive no money for your services. If a potential conflict of interest could develop, you must seek guidance from an ATK Legal Advisor or the Corporate Ethics and Compliance Office before accepting such an appointment.

## Nepotism

A working relationship between a supervisor and subordinate who are also related may raise questions about objectivity and create the appearance of favoritism. You may not supervise or be supervised by a family or household member. You must disclose any of these supervisory relationships to an ATK Legal Advisor or the Corporate Ethics and Compliance Office immediately. ATK will reassign employees who have family or household ties so that these employees are no longer in a direct reporting relationship.

## Responsible Use of Social Media

### ATK's Social Media Policy

ATK respects the right of employees to use social media during their personal time and asks you to be respectful in any statements you make regarding ATK, co-workers, customers, partners or competitors. It is important to keep in mind that a social media posting is generally considered public and, once posted, information may exist indefinitely. Also, improper or unauthorized disclosures in the name of or on behalf of ATK could damage our reputation, impact our ability to get and keep customers, and expose ATK, our customers and partners to legal liability.

ATK's Use of Social Media Policy provides more complete information on employee conduct when using external social media. Below are some highlights from that policy.

- ▶ If you reveal yourself as an ATK employee, you must make it clear that the views expressed are yours alone and not the views of ATK
- ▶ Do not post detailed information about your job and remember that you are prohibited from posting or discussing proprietary information, trade secrets, private company information, classified data or information subject to export control requirements



**Q:** I have an opportunity to serve on the board of an industry organization. Should I disclose this opportunity to ATK before I accept it?

**A:** Yes. You should discuss the opportunity with your ATK Legal Advisor or the Corporate Ethics and Compliance Office to ensure that your service on the board would not create a personal conflict of interest.

- ▶ You should not disclose nonpublic information regarding ATK's financial performance, business or prospects, or that might affect the price of ATK stock or other securities
- ▶ Use common sense, act with integrity, and follow this Code and ATK policies regarding harassment and discrimination when making media posts
- ▶ You must not post rumors that you know are false or make other misleading or defamatory statements about ATK or its employees, customers, partners or affiliates



### Commenting on ATK's Products

Under Federal Trade Commission regulations, if you comment on any of ATK's commercial products or services, your comments must reflect your honest beliefs and you must identify yourself as an ATK employee and state that the views expressed are yours alone and do not necessarily reflect the views of ATK.

### Using ATK Technical Resources to Access Social Media

If you are using ATK technical resources to access external social media sites, you are subject to ATK's Acceptable Use of Technology Policy. ATK has the right to access and review all data and information left on or transmitted over ATK's systems, including content employees post on private social media sites using ATK technology resources, except as restricted by local law.

### Official ATK Social Media Channels

ATK is active in social media to keep our stakeholders apprised of key business developments, community support and industry recognition. ATK's social media sites are maintained and monitored by authorized employees with specific job responsibility for ethically upholding ATK's external reputation.



**Q:** Over the weekend, I was in an industry chat room and saw inaccurate information about ATK's plans and prospects. I commented and provided the correct information. Is that okay?

**A:** No. You should not respond to the inaccurate information unless you have been explicitly authorized to speak on ATK's behalf. Instead, bring this posting and others to the attention of ATK Corporate Communications at [corporate.communications@atk.com](mailto:corporate.communications@atk.com) or an ATK Legal Advisor.

## Responding to Inquiries from the Media and the Investment Community

✓ At ATK, we protect our reputation with accurate and appropriate communications

We all have a responsibility to protect ATK's reputation through our behavior and performance. We also need to make sure that any legal obligations relating to ATK's communications are met. Because of this, ATK has authorized certain individuals – and only those individuals – to speak on behalf of ATK. All media inquiries must be referred to ATK Corporate Communications. Exceptions are allowed for local inquiries to business group or division employees who have responsibility for media relations. All inquiries related to a crisis situation must be forwarded to ATK Corporate Communications. All contacts with stockholders, prospective investors and securities analysts, or requests for information related to ATK's financial performance, must be referred to ATK Investor Relations.

## Appropriate Political Activity and Lobbying

✓ We must ensure that our participation in the political process is appropriate and lawful

ATK participates in the U.S. political and legislative process to ensure that ATK's interests in the aerospace, defense and sporting industries are appropriately represented. ATK fully complies with applicable laws and regulations to make certain that our political and lobbying activities are conducted in a legal, ethical and transparent manner. If you wish to contact officials to influence legislation, regulations or enforcement on behalf of ATK, you must first obtain the approval of ATK Government Relations.

ATK encourages you to participate individually in the political process on your own time and expense and without use of ATK resources. At no time should you create the impression that you are expressing political views on ATK's behalf.



**Q:** A co-worker and I are supporting a political candidate and want to stay late at the office to make political phone calls and emails. May we do that?

**A:** No. While ATK encourages employees to be engaged in the political process, you may not use ATK resources to conduct activity in support or defeat of political candidates.



# How We Interact with Our Customers and in the Marketplace

## Antitrust, Sales Practices and Fair Dealings



**Always be fair and transparent in the conduct of our business**

Fair competition is fundamental to the free market system. The antitrust and competition laws are designed to preserve the free market system by ensuring vigorous competition that does not unfairly limit trade or exclude competition. At ATK, we seek to outperform our competitors fairly and ethically, achieving competitive advantage through superior performance and products and never through unethical or illegal business practices.

While antitrust and competition laws can be complex, there are several basic principles that we should always follow. At a minimum, you should **never**:

- ▶ Make any agreement, formal or informal, with a competitor regarding pricing of our products in the marketplace, pricing practices, bids, bidding practices, terms of sale or marketing practices
- ▶ Agree with a competitor to divide customers, markets or territories

- ▶ Agree with a competitor not to deal with another company
- ▶ Attempt to control a customer's resale price
- ▶ Force a customer to buy one product in order to get another product
- ▶ Unreasonably restrict a customer's ability to deal with other companies
- ▶ Engage in price discrimination that unreasonably restrains competition or creates a monopoly
- ▶ Disparage a competitor or its products, misrepresent our products or services, or misrepresent the products or services of a competitor

Consequences for failure to comply with the antitrust and competition laws are extremely serious and include imprisonment for individuals and significant fines, penalties and expenses for the company. It is your obligation as an employee to understand your responsibilities under these laws, report violations and consult with your ATK Legal Advisor if you have any questions.



**Q:** Recently, I attended an industry trade meeting where a sales representative for a competitor talked during dinner about pricing challenges in the market and the need to increase prices. This conversation made me very uncomfortable, but I felt it would have been rude to leave. Did I handle this correctly?

**A:** No. You must always be very careful in discussions with competitors. It is never appropriate to discuss pricing issues with a competitor or even listen to such discussions. Even casual conversations have a potential to cause harm or may suggest a violation of the antitrust laws. You should immediately excuse yourself from any conversation with a competitor that discusses competitively sensitive topics and then promptly notify an ATK Legal Advisor. In this instance, you should also contact an ATK Legal Advisor about the discussions at the recent trade meeting.



## Accurate Business Records, Financial Reporting and Record Management



Ensure our records are accurate, timely and complete

### Recordkeeping

ATK's "Do Right" philosophy extends to company records that we create. Each of us has the responsibility to ensure that all of ATK's records are accurate, timely and complete. Proper authorization must be obtained before incurring, paying or transferring ATK funds and assets. Forecasts and assessments provided to management must be done in a timely manner.

If you see an error or omission in an ATK document, report it immediately to your supervisor or manager, ATK's Internal Audit Department, or ATK's Ethics Helpline at **1-800-345-8594**. You should never direct anyone to prepare or approve a misleading record. It is no defense to say someone else directed you to create a record that you knew or had reason to suspect was false or misleading.



### Financial Reporting

All disclosures made in financial reports and public documents filed with the U.S. Securities and Exchange Commission, or other regulatory authority, and other public communications, must be full, fair, accurate, timely and understandable. If you are involved in the preparation of these filings, you must work to ensure that the information contained in these filings accurately reflects ATK's operations and financial condition.



**Q:** I suspect that there is an inaccurate or artificial entry in ATK's books and records. It could be that there are legitimate differences in professional opinion regarding the entry. On the other hand, I am worried that the entry is false or there may be a mistake. It is really not my place to question accounting and I am sure someone else is reviewing it. Should I talk to someone about this?

**A:** Yes. You must speak up and discuss your concerns with your supervisor or manager or, if you are uncomfortable doing that, report it to ATK's Ethics Helpline at 1-800-345-8594. Do not delay. If you are concerned, then we are concerned. Let's find out the facts and make sure that our books and records accurately reflect our business activity.

## Truth and Accuracy in Reporting

Truth and accuracy in reporting is required. ATK will not tolerate the creation or approval of records that are inaccurate, false or misleading. It is fraudulent and a violation of this Code to:

- ▶ Inaccurately record time for reporting purposes
- ▶ Falsify quality, environmental or safety reports
- ▶ Process or submit false or inaccurate invoices
- ▶ Record false revenue
- ▶ Understate or overstate known liabilities or assets
- ▶ Submit inaccurate expense reports
- ▶ Alter, remove or destroy documents except in accordance with ATK's policies
- ▶ Approve inaccurate information for publication or other use

Material financial fraud would harm ATK's reputation and could adversely affect ATK's financial condition. It could also result in significant criminal and civil penalties to ATK and the individuals involved. Anyone engaged in fraud at ATK will be subject to disciplinary action up to and including termination.



## Retaining and Destroying Company Records

Each of us must also ensure that ATK's documents are retained to the extent required to meet legal, tax and regulatory requirements, and that documents are properly destroyed when they no longer serve a business or legal purpose. All ATK records should be retained or destroyed according to ATK's Record Retention Policy. You are expressly prohibited from altering, destroying or failing to preserve any records to avoid disclosure in a lawsuit or investigation.



**Q:** A governmental agency is investigating a claim brought by a former employee alleging that ATK failed to perform required quality checks on a product that has already been shipped. Because the official log sheet showed that the quality checks were completed, do the quality inspector's handwritten notes need to be retained?

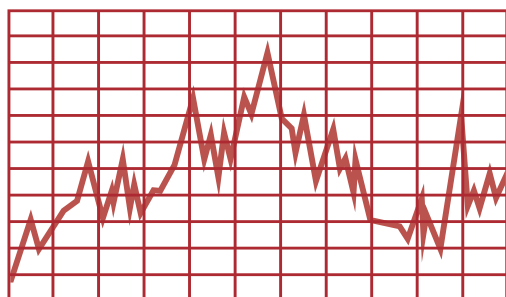
**A:** Yes. Any documents that might be relevant to a pending claim or investigation should be retained.

## Avoiding Insider Trading and Tipping



**Do not trade on or tip “inside” information**

If you are aware of material nonpublic information (“inside information”) relating to ATK or our business, you may not buy, sell or trade ATK stock or securities. In addition, you may not trade in stock or securities of another company (for example, ATK’s customers, suppliers, vendors, subcontractors and business partners) if you have material nonpublic information about that company that you obtained at ATK. It is also unlawful for you to “tip” others, or pass along inside information to friends, family or others to help them make a profit, avoid a loss, or suggest that they trade when you are not permitted to do so.



What is material information? It depends on the facts and circumstances, but it is information that would be important to an investor in deciding whether to buy, sell or hold stock of a company. Material information includes (but is not limited to):

- ▶ Earnings results or estimates, or other important financial information
- ▶ A proposal, negotiations, or agreement for a significant merger, acquisition, divestiture or joint venture
- ▶ A significant new contract or change in a significant contract
- ▶ A significant new product or development
- ▶ Significant litigation

These rules apply to you, even if you have not signed a confidentiality agreement. You may not trade in ATK stock or securities (or the other company’s stock or securities) when you have material inside information until this information is publicly announced. If you have a question about whether information is material nonpublic information or any other questions about your securities trading, please check with your ATK Legal Advisor.

?

**Q:** What if I become aware of ATK’s quarterly financial results before they have been publicly announced. Can I purchase ATK stock or tell my parents to purchase ATK stock knowing that information?

**A:** No. This information is considered “material nonpublic information” and the purchase of ATK stock would be a violation of ATK’s Business Ethics Code of Conduct and a potential criminal violation of the federal securities laws. “Tipping” this information to your parents would also be a violation, even if you do not give a reason for telling them to buy the shares.

## Product Quality and Safety

✓ Our customers depend on us to deliver reliable, safe and quality products

We must ensure that all of our products are designed and manufactured in compliance with all applicable safety laws and regulations, quality requirements and specifications. Our customers depend upon us for reliable, safe and quality products. It is never okay to cut corners, falsify documentation, skip an inspection or use an undocumented process. Our customers depend on each of us to get it right and do it right, every time, all the time.



## Vendors and Suppliers, Selection and Fair Dealing

✓ We select suppliers and vendors who follow ATK's standards and we deal with them fairly

ATK's strategy is to create market-leading positions by delivering affordable and innovative solutions to our customers. Our success is highly dependent upon the efforts and contributions of our suppliers. We expect our vendors and suppliers to help us to deliver value to our customers by providing ATK with the highest quality products delivered on time and at the best value.

### Selection of Suppliers

ATK partners with suppliers who demonstrate proven capabilities and adherence to quality, cost and schedule commitments. It is ATK's policy to actively pursue opportunities to assist small businesses and diversity companies in becoming qualified and valued ATK suppliers. In choosing among competing suppliers, you must impartially select the supplier that best meets ATK's needs. You must base your decision on objective information such as price, past performance, business reputation, technical expertise, production capacity and financial stability.



**Q:** Due to budget concerns I am getting a lot of pressure from my supervisor to make sure a particular part we have been struggling with passes inspection. The part seems to work, but I am not sure it will pass the quality inspection. Would it be okay for me to approve it without a quality inspection?

**A:** No. Budget concerns can put a lot of pressure on our program teams, but they are never a reason or excuse to change our standards for product quality and safety and our commitment to execution excellence. If your supervisor ever directs you to skip an inspection or otherwise deviate from the process, you should challenge that direction and report it to the Corporate Ethics and Compliance Office or call ATK's Ethics Helpline at **1-800-345-8594**.

In making selection decisions, you must avoid real or perceived conflicts of interest. You must also follow ATK's guidelines before you accept any gift, hospitality or other entertainment from a supplier. You should consult with your ATK Legal Advisor or the Corporate Ethics and Compliance Office before accepting business courtesies.

### **Fair and Transparent Dealings**

We must always remember that ethical business behavior is good business and that we should maintain transparent and honest procurement practices in our roles at ATK.

- ▶ Engage in fair and transparent dealings with suppliers, treating valued suppliers with integrity and professionalism
- ▶ Follow applicable procurement standards and laws in working with suppliers
- ▶ Use the same care in protecting supplier proprietary and trade secret information as you would use in protecting such information belonging to ATK
- ▶ Understand the terms of ATK's contract with the supplier and ensure that those terms are followed by anyone working with that supplier

### **Business Conduct Standards**

We expect our suppliers to abide by ATK's Business Ethics Code of Conduct. If your job involves selecting or managing suppliers, ensure that the supplier understands our requirement to operate at the highest standard of ethics, integrity and governance. You must also be alert to and report to your supervisor or manager any conduct by a supplier, its employees or subcontractors that appears to be inconsistent with the standards of this Code.

### **Corporate Responsibilities and Citizenship**

We expect our suppliers to follow all laws that require them to treat workers fairly, provide a safe and healthy work environment, and protect natural resources. Like ATK, suppliers should seek to minimize the environmental impact of their operations and reduce waste, emissions, energy consumption and the use of materials of concern. ATK expects suppliers to treat their workers with integrity and respect, and we have zero tolerance for trafficking in persons or the use of forced labor. Suppliers are required to comply with this prohibition and take affirmative steps to combat trafficking in persons and forced labor.

### **Avoidance of Counterfeit Parts**

ATK is committed to eliminating counterfeit parts from our supply chain. For that reason, ATK purchases products and materials directly from the original equipment manufacturer (OEM), the original component manufacturer (OCM), or through an OEM/OCM authorized distributor chain. For those suppliers that are delivering manufactured parts or components, we expect the same, and we require that all suppliers have in place robust policies and procedures to avoid procuring or otherwise introducing counterfeit parts into the ATK supply chain.

## Doing Business with the Government

✓ **As a government contractor, ATK is held to a high standard when it comes to ethics and compliance**

Special rules apply when we do business with the government, and the government can impose substantial penalties and charge a company and its employees with a crime for violating government procurement laws. As a result, these basic rules must be followed in all of our business with a government:

- ▶ You must ensure that all invoices you submit to a government customer are accurate and complete and comply with the applicable procurement regulations. We must be truthful in all representations and certifications made to government agencies.
- ▶ You must avoid even the perception of an organizational conflict of interest and report any suspected organizational conflict of interest to your ATK Legal Advisor. An organizational conflict arises when, because of activities or relationships with others, a contractor such as ATK is unable to provide impartial assistance to the government, has an unfair competitive advantage, or has the ability to bias the ground rules.



- ▶ You must ensure that all cost or pricing data is accurate, complete and current, charge all costs to the right account, and know and follow all ATK accounting policies and practices.
- ▶ Always consult with an ATK Legal Advisor before having discussions about employment or consulting opportunities with a current or former government employee.

You must never knowingly charge an incorrect account or shift costs between contracts or projects. You will be subject to discipline within ATK if you are found to be mischarging costs. If you knowingly make false charges, you may be guilty of a crime. You should refer to ATK's policy on Government Accounting and Compliance for further information.

ATK has an affirmative duty to alert the U.S. Government when we have credible evidence of a violation of certain federal laws related to fraud, conflict of interest, bribery, unlawful gratuities, any act that could lead to a claim under the Civil False Claims Act, or overpayments. You have a duty to notify your ATK Legal Advisor immediately if you suspect a violation related to any of these laws that could trigger a requirement to make a disclosure to the U.S. Government. Failing to disclose these types of violations can result in significant fines or suspension or debarment from U.S. Government contracts. You should refer to ATK's policy on Government Contract Mandatory Disclosures for further information.

If you are involved in bidding on or providing products or services for a government contract, or providing information on any other aspect of managing or performing government contracts, you are expected to understand and comply with all rules, regulations and company policies relating to government contracting and to contact your ATK Legal Advisor if you have any questions.



**Q:** A consultant has offered to help me sell a big contract to the foreign ministry of defense. Her services will cost \$50,000 and she has said that some of the funds will go to her contact within the defense ministry. Any concerns?

**A:** Yes. Paying money to anyone for the purpose of influencing a foreign official violates the Foreign Corrupt Practices Act (FCPA). Additionally, the foreign country may also have anti-bribery laws which could also be violated. Contact your ATK Legal Advisor for further guidance.

Some laws (including the FCPA) also make it an offense to fail to properly record payments to or for the benefit of public officials. Under our policies, all payments, benefits or favors we make to anyone, including public officials, must be fully and accurately reflected in our financial statements.

Because a third party acting on behalf of ATK can expose the company to liability under the FCPA and other anti-bribery laws, great care must be taken in retaining representatives and other third parties. You must comply with ATK's policies and procedures, including our due diligence processes in the appointment, management and payment of third-party intermediaries, agents and distributors.

It is important to remember that simply offering a bribe or kickback to anyone is enough to violate ATK policy and the law. Bribery and kickbacks are very serious crimes and it is important that ATK does not allow even the appearance of impropriety. You should consult with your ATK Legal Advisor or ATK's Corporate International Law Group for further information.

## No Bribery or Corruption

✓ **ATK does not tolerate bribery or corrupt activities in any aspect of our business**

At ATK, we may not engage in any form of bribery or kickbacks. You must never offer, give, solicit or accept any form of bribe or kickback in any aspect of our business, including our commercial transactions as well as our dealings with government officials and employees. A bribe or kickback involves accepting or providing (directly or indirectly) money, gifts or anything of value to obtain or retain business, direct business to any other person or entity, or secure an improper advantage. Favorable treatment may appear innocent, but it is illegal when offered in exchange for a bribe or kickback. You should never offer or accept anything of value if you have the slightest doubt about the transaction.



Many anti-bribery laws like the U.S. Foreign Corrupt Practices Act (FCPA) specifically prohibit bribes to or for the benefit of public officials. The term “public official” is broadly defined and includes government officials and employees, employees of government-owned businesses and candidates for public office.

The FCPA applies to all of our international business. We must comply with all applicable anti-bribery laws and never offer or accept a payment or gift that may be construed as illegal or improper regardless of local law or custom.

In certain parts of the world, it is common for low-level foreign government employees to ask for small payments to expedite or secure the performance of a routine governmental action, such as to obtain a visa or to schedule an inspection. ATK has a clear policy prohibiting such “facilitating payments” without the review and approval of an ATK Legal Advisor, no matter how common or ordinary the payment may appear. You should always consult your ATK Legal Advisor if you have questions or concerns.



## Gifts, Hospitality and Entertainment



**We avoid improper gifts, hospitality and entertainment**

You should always follow ATK's Business Courtesies, Gifts and Gratuities Policy whenever you are offered or wish to offer gifts, hospitality or entertainment. You should avoid any situation in which the gift, hospitality or entertainment would violate applicable law or impact the recipient's objectivity. Never offer or accept any gift or entertainment that is intended to create an obligation or influence or reward a business decision.

### Guidelines When Dealing with Government Officials and Employees

- ▶ You should exercise caution before offering "anything of value" to a government official or employee. "Anything of value" can include gifts, meals, entertainment, business incentives or commissions, travel expenses or any other favor. Even a small gift or a simple lunch may violate the law.

### Guidelines When Dealing with Suppliers

- ▶ Employees who procure goods and services must take care to ensure all procurement decisions are made on the merits and are not influenced, nor do they appear to be influenced, by personal interest.
- ▶ No one should use their position at ATK to obtain gifts or other economic benefit.
- ▶ Receipt of certain business courtesies may be appropriate to promote goodwill and maintain or establish successful business relations, but you must ensure that the courtesies, gifts or entertainment conform to ATK's Business Courtesies, Gifts and Gratuities Policy.

### Guidelines When Receiving Business Courtesies

- ▶ All business courtesies offered to and accepted by ATK employees are gifts belonging to ATK and are not for your personal use.



## Compliance with Export and Import Controls



**Follow the rules that apply to our international business**

ATK complies with international trade laws and regulations of the United States and all other countries where ATK is located or does business, including export control, embargoes/sanctions and anti-boycott laws.

International trade laws and regulations govern the transfer between countries of goods, services and technology. These laws and regulations are complex, change frequently and apply to many aspects of our business. If you support actual or potential business outside of your country, you must be familiar with ATK's policies and practices relating to international trade. Support activity can range from contact with a foreign national at a company facility during a plant tour or trade show to sending a product formulation to an overseas supplier or submitting a proposal to a foreign government. Make sure you review and understand the regulatory requirements before engaging in international business.

We also must not cooperate with any restrictive trade practices or boycotts that are prohibited or penalized under U.S. or applicable local law.

Penalties for violations of international trade laws can be severe, including fines, imprisonment or debarment from government contracting. You should consult with ATK's International Trade Operations, ATK's International Law Group or your ATK Legal Advisor if you have any questions.



**Q:** I have regular email exchanges with a customer engineer in another country about my project. Any export control concerns?

**A:** Yes. Your email exchanges may be transmitting technical data to a foreign national that is controlled for export by your country's laws and may require an authorization prior to transmission. Depending on the nature of the exchanges and the technical data, you may also be providing a service that may also require an authorization. Contact ATK's International Trade Operations, ATK's International Law Group or your ATK Legal Advisor for guidance.

## Environmental Compliance and Stewardship

✓ **Environmental compliance is a high priority**

Compliance with environmental laws and ATK environmental practices is a high priority at ATK. You must immediately notify your supervisor if you believe a violation of the law or ATK environmental practice has occurred or will potentially occur or you become aware that a required permit for our operations has not been obtained or is no longer valid. If you become aware of a spill or a release into the environment, you must notify both your supervisor and the facility environmental department immediately so the appropriate spill response activities can be initiated.

We also strive to minimize the impact of ATK's operations on the environment and to proactively incorporate environmental initiatives into ATK's day-to-day operations. Environmental concerns and requirements should be evaluated and addressed during all phases of facility modifications, acquisitions and divestitures, and facility closures. If your job involves the handling, transportation or disposal of raw materials, products or wastes, you should ensure that these activities are done in a safe and environmentally responsible manner.



**Q:** We are planning a small modification to our plant to improve efficiency. The plant has several environmental permits, but since we are not increasing production, do I have to bother with evaluating the environmental impacts of this change?

**A:** Yes. Even minor changes to our operations, such as those that only optimize our efficiency, should be evaluated against our existing permits and compliance matrix. You should discuss the proposed changes with the facility's environmental department to ensure that any permitting and compliance concerns are addressed.



# How We Use Our Resources and Assets

At ATK, each of us has a significant responsibility to protect ATK and customer resources and assets. These assets should first and foremost be used for business purposes and to advance ATK's strategic objectives.

## Responsible Use of ATK and Customer Assets

✓ Use due care and judgment at all times

We must exercise care and good judgment in using and protecting ATK and customer assets responsibly to avoid loss, damage, theft, unauthorized or improper use, and waste and must obtain proper authorization before moving assets. You may not loan any ATK property without permission and you must use customer and supplier assets in accordance with their instructions.



**Q:** My daughter would like to use my ATK laptop to watch movies online. Can I give her my login name and password so she can use my computer?

**A:** No. Your computer is provided to you for your business use. It is against ATK's policies to share your login and password information with anyone. Downloading movies also violates ATK policy and potentially violates copyright laws. You should refer to ATK's Global Information Security policies for further details.

## Protecting our Technologies

✓ **Be vigilant in protecting our electronic resources and technologies**

Due to the critical nature of products that ATK produces, each of us must use best practices when it comes to cyber security. Our intellectual property is very valuable to many outside of ATK. It is critical that each of us responsibly uses the Internet and use care in replying to emails or clicking on links included in emails from unknown sources.

### ATK's Information Security Policies

You must comply with the information security policies that ATK has put in place to protect our electronic data, such as intellectual property and personally identifiable information. ATK has the right to require security controls on all electronic devices used to conduct business on behalf of ATK. This includes devices used to interact with ATK internal networks and business systems, regardless of ownership. ATK also has the right to inspect at any time all messages, files, data software or other information stored on these devices or transmitted over any portion of the ATK network, unless restricted by local law.

### Insider Threats

Economic espionage is the unlawful targeting or acquisition of sensitive financial, trade or economic policy information, proprietary economic information, or technological information. An "Insider Threat" or "Insider" is a person who knowingly or unknowingly commits economic espionage from within an organization. These threats may involve fraud, theft of protected or commercially valuable information or intellectual property, sabotage of a company's enterprise system, or gross negligence of established security practices.





ATK's Insider Threat Program is proactive. If you have knowledge of any possible Insider Threats you should promptly call the Counter Intelligence Office at (571) 403-5264 or ATK's Ethics Helpline at 1-800-345-8594 to discuss or report any concerns.



1300 Wilson Blvd  
Suite 400  
Arlington, VA 22209  
[www.ATK.com](http://www.ATK.com)

Last updated November 2013.