



Privacy Policy - ORGANIZATIONAL CODE OF CONDUCT

Company Name: ATS Communications, Inc.	Policy Name: Organizational Code of Conduct
Policy Number: Code of Conduct	Effective Date: 5/15/18
Responsible for Review: Thomas Klosterman	Review Date: 11/18/2021

ATS Communications, Inc. and its employees must, at all times, comply with all applicable laws and regulations. ATS Communications, Inc. will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. ATS Communications, Inc. does not permit any activity where public scrutiny or opinions would damage the reputation of ATS Communications, Inc..

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted, in any way, in contravention of the laws and regulations governing ATS Communications, Inc. operations.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, who, if necessary, should seek appropriate legal advice.

Employees need to utilize the company provided systems in a correct and timely manner.

General Employee Conduct:

ATS Communications, Inc. expects its employees will conduct themselves in a business-like manner. Drinking, gambling, fighting, swearing, and similar unprofessional activities are strictly prohibited while on the job.

Employees must not engage in sexual harassment, or conduct themselves in a way that could be construed as such. For example, by using inappropriate language, keeping or posting inappropriate materials in their work area, or accessing inappropriate materials on their **ATS Communications, Inc.** computer.

Conflicts of Interest:

ATS Communications, Inc. expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of ATS Communications, Inc.. Employees must not use their positions, or the knowledge gained as a result of their positions, for private or personal advantage. Regardless of the circumstance(s), if employees sense that a course of action they have pursued, are presently pursuing, or are even contemplating pursuing may involve them in a conflict of interest with their employer, they should immediately communicate all those facts to their supervisor.

Outside Activities, Employment, and Directorships:

All employees share a serious responsibility for **[ATS Communications, Inc.]** good public relations, especially at the community level. Their readiness to help with religious, charitable, educational, and civic activities brings credit to ATS Communications, Inc. and is encouraged.

Employees must, however, avoid acquiring any business interest, or participating in any other activity outside ATS Communications, Inc. that would, or would appear to:

- Create an excessive demand upon their time and attention, thus depriving ATS Communications, Inc. of their best efforts on the job.

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- Create a conflict of interest - an obligation, interest, or distraction - that may interfere with the independent exercise of judgment in ATS Communications, Inc. best interest.

Relationships With Clients and Suppliers:

Employees should avoid investing in or acquiring a financial interest in any business organization that has a contractual relationship with ATS Communications, Inc. . Also, avoid entering into a contractual agreement with an entity that provides goods or services, or both, to ATS Communications, Inc. if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of ATS Communications, Inc. .

Gifts, Entertainment, and Favors:

Employees must not accept entertainment, gifts, or personal favors that could, in any way, influence (or appear to influence) business decisions in favor of any person or organization with whom or with which ATS Communications, Inc. has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their positions with ATS Communications, Inc. might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

Kickbacks and Secret Commissions:

Regarding ATS Communications, Inc. business activities: Employees may not receive payment or compensation of any kind, except as authorized under ATS Communications, Inc. business and payroll policies. In particular, ATS Communications, Inc. strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will fully result in immediate termination and prosecution of the law.

Organization Funds and Other Assets:

Employees who have access to ATS Communications, Inc. funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in ATS Communications, Inc. policies and procedures or other explanatory materials. ATS Communications, Inc. imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise their supervisor or seek appropriate legal guidance so that ATS Communications, Inc. can promptly investigate.

When an employee's position requires spending ATS Communications, Inc. funds or incurring any reimbursable personal expenses, that individual must use good judgment on ATS Communications, Inc. behalf to ensure that the funds were used in a strictly professional capacity and benefited ATS Communications, Inc..

ATS Communications, Inc. funds and all other assets of ATS Communications, Inc. are purposed for ATS Communications, Inc. only and not for personal benefit. This includes the personal use of organizational assets, such as computers.

Organization Records and Communications:

Accurate and reliable records of many kinds are necessary to meet ATS Communications, Inc. legal and financial obligations and to manage the affairs of ATS Communications, Inc.. ATS Communications, Inc. books and records must reflect, in an accurate and timely manner, all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities (or both) while exercising diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

Dealing With Outside People and Organizations:

Employees must take care to separate their personal roles from their organizational positions when communicating on matters not involving ATS Communications, Inc. business. Employees must not use organizational identification, stationery, supplies, and equipment for personal or political matters.



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When communicating publicly on matters that involve ATS Communications, Inc. business, employees must not presume to speak for ATS Communications, Inc. on any topic. This is unless they are certain that the views, they express are those of ATS Communications, Inc. and it is ATS Communications, Inc. desire that such views be publicly disseminated.

When dealing with anyone outside ATS Communications, Inc. including public officials, employees must take care not to compromise the integrity or damage the reputation of ATS Communications, Inc.. This applies as well to any outside individual, business, or government body.

Prompt Communications:

In all matters relevant to customers, suppliers, government authorities, the public, and others in ATS Communications, Inc., all employees must make every effort to achieve and accurately complete timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

Privacy and Confidentiality:

When handling financial and personal information about customers or others with whom ATS Communications, Inc. has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for ATS Communications, Inc. business dealings. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
- Limit internal access and personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information unless legal process or contractual obligation provides otherwise.

Attendance:

This policy details how absences and tardiness are counted for the purposes of maintaining excellent customer service throughout the business day.

- Family and Medical Leave Act: Absences due to illnesses or injuries that qualify under the Family and Medical Leave Act (FMLA) will not be counted against an employee's attendance record. Medical documentation within the guidelines of the FMLA may be required in these instances.

Absences and Tardiness:

- Prescheduled times away from work using accrued PTO or holiday, days are not considered occurrences for the purpose of this policy.
- An absence occurs when an employee misses more than three hours of work within a normal workday. An absence of multiple days due to the same illness, injury, or other incident will be counted as one occurrence for the purpose of this policy. A tardy arrival, early departure or other shift interruption is considered a one-half occurrence. On occasion and with prior approval of the supervisor, an employee who is tardy may adjust that day's schedule to work an equivalent amount of time at the end of the shift, and a one-half occurrence will not be counted. Arrival and departure times will be determined by the time on the time recording system in each department. An employee is considered late if he or she reports to work more than five minutes after the scheduled starting time; an early departure is one in which the employee leaves before the scheduled end of his or her shift. If an employee is scheduled to work overtime and either fails to report or reports after the scheduled start time, an occurrence will be charged as noted above.

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