

Code of Conduct for Suppliers and Subcontractors (“Supplier Code of Conduct”)

Resonac Graphite Business Unit (meaning all companies of the Resonac Group as shown under the following Link “www.graphite.resonac.com” (“Resonac Graphite”) are recognized as one of the leading Graphite Electrodes producers worldwide. Our aim is to provide our customers with products setting the highest quality standards while performing along legal, ethical and sustainable principles.

Resonac Graphite expects all of its suppliers (each individually referred to as “**Supplier**”, collectively referred to together the “**Suppliers**”) and subcontractors (the “**Subcontractors**”) to ensure compliance with all applicable domestic and international laws and regulations and with this Resonac Graphite Supplier Code of Conduct that is based on the principles of the United Nations Global Compact initiative, the United Nations Universal Declaration of Human Rights, the International Labor Organization Declaration (ILO) on Fundamental Principles and Rights at Works. To foster compliance with applicable legal provisions and this Supplier Code of Conduct and to improve constantly, Suppliers and Subcontractors are expected to implement an appropriate compliance management system and to take appropriate steps to ensure compliance with these requirements by their suppliers and Subcontractors. This includes, but is not limited to, that Suppliers and Subcontractors appropriately inform and train their employees along the lines of this Supplier Code of Conduct.

Supplier herewith covenants to comply with the provisions set forth in this Supplier Code of Conduct and will obligate its subcontractors to also comply with these provisions. A violation of the principles of this Supplier Code of Conduct by the Supplier entitles all Resonac Graphite entities to terminate all existing supply agreements with this Supplier.

1. Business Integrity

Permits, approvals, licenses

You commit that all required permits, approvals, licenses, registrations, inspections and required reports are in place and up to date and available upon request of Resonac Graphite.

Anti-corruption

We expect all Resonac Graphite Suppliers to show zero-tolerance for corrupt actions including but not limited to facilitation payments, extortion, embezzlement and to take actions against those. You commit to comply with all applicable anti-corruption laws and not to engage in any form of corruption or bribery. You commit to ensure that your employees and persons acting on your behalf, do not grant, offer or accept bribes, kickbacks, facilitation payments or other improper benefits to or from customers, officials or other third parties.

You commit to neither directly or indirectly offer, promise or grant any advantages to any Resonac Graphite employee with the goal of preferential treatment or to gaining influence in the business interaction with Resonac Graphite. Gifts, hospitalities or other benefits, if any, must be reasonable, suitable, of low value and in line with local business customs. Likewise, we expect

Resonac Graphite Suppliers to refrain from requesting Resonac Graphite and its employees for any inappropriate treatment, advantages, gifts or hospitality.

Anti-money laundering

You commit to refrain from any form of money-laundering activities and to act in line with applicable anti-money laundering laws and provisions and due diligence requirements.

Conflict of interest

You commit to avoid all direct or potential conflicts of interest while engaged with Resonac Graphite. You further agree to disclose to Resonac Graphite any other facts which you become aware which might involve or give rise to a direct or potential conflict of interest. Any private relationship with Resonac Graphite employees (e.g., friendship or family connections) must be formally reported to Resonac Graphite.

Fair competition

You commit to comply with all applicable anti-trust laws and regulations and to neither participate in illegal cartels, nor to exchange competitively sensitive information, nor to participate in any kind of anti-competitive activities nor to take advantage of any dominant

market position.

You commit to comply with all applicable laws and regulations against unfair competition and to neither participate in acts that cause confusion with respect to another's enterprise or its activities, nor to participate in infringements upon commercial secrets, nor to fabricate or disseminate false information or misleading information to harm the competitors, nor to make use of technical means to influence users' choice or any other method nor to participate in any activity of unfair competition.

Import and export controls

You commit to provide services and goods on grounds of all applicable national and international trade laws and regulations including but not limited to trade control, customs regulations and sanction regimes, including economic, financial or trade sanctions laws, regulations, executive orders, or restrictive measures.

Intellectual property and business secrets

Resonac Graphite expects its Suppliers to respect the intellectual property of others. You commit to take appropriate steps to safeguard and maintain all confidential and proprietary information or trade secrets of Resonac Graphite. Any confidential and proprietary information of Resonac Graphite may only be published or shared with subcontractors with the prior written consent of Resonac Graphite.

Privacy

You commit to collect, record, organize, structure, store, adapt or alter, retrieve, consult, use, disclose, disseminate, align or combine, restrict, erase or destruct all personal data as agreed in the respective contract and in line with applicable national and international data protection legislation.

Accounting records

You commit to maintaining accurate and complete accounting records.

2. Human rights, labor rights and occupational health and safety

At Resonac Graphite, we uphold the human rights of all employees and of the employees of

our business partners. We treat all employees and employees of business partners with dignity and respect. Resonac Graphite expects its suppliers to act likewise.

You commit to providing working conditions and labor standards in line with applicable domestic and international laws and regulations. You especially commit to comply with all principles set forth in the following agreements:

1. Convention No. 29 of the International Labour Organisation of 28 June 1930 concerning forced or compulsory labour
2. Protocoll of 11 June 2014 to Convention No 29 of the International Labour Organisation of 28 June 1930 concerning forced or compulsory labour
3. Convention No. 87 of the International Labour Organisation of 9 July 1948 concerning freedom of association and protection of the right to organize as amended by the Convention of 26 June 1961.
4. Convention No. 98 of the International Labour Organisation of 1 July 1949 concerning the Application of the Principles of the Right to organize and to bargain collectively, as amended by the Convention of 26 June 1961.
5. Convention No. 100 of the International Labour Organisation of 29 June 1951 concerning equal remuneration for men and women workers for work of equal value.
6. Convention No. 105 of the International Labour Organisation of 25 June 1957 concerning the abolition of forced labour.
7. Convention No. 111 of the International Labour Organisation of 25 June 1958 concerning the discrimination in respect of employment and occupation.
8. Convention No. 138 of the International Labour Organisation of 26 June 1973 concerning the minimum age for admission to employment.
9. Convention No. 182 of the International Labour Organisation of 17 June 1999 concerning the prohibition and immediate action for the elimination of the worst forms of child labour.
10. International Covenant of 19 December 1966 on civil and political rights.
11. International Covenant of 19 December 1966 on economic, social and cultural rights.
12. Minamata Convention on Mercury of 10 October 2013 (Minamata Convention)

You commit to providing for working conditions that support health, safety and security at all workplaces and to implementing management systems to facilitate continuous improvement.

Child labor

You commit to refrain from and to fight any kind of child labor. You commit to not employ any person under the minimum legal working age applicable to their country or below the age of 15.

Forced labor and human trafficking

You commit to refrain from and to fight any kind of forced, compulsory or involuntary prison labor, human trafficking and slavery.

Equal opportunities and non-discrimination

You commit to provide for equal opportunities and equal treatment and refrain from any form of discrimination in recruiting and at work. No employee or candidate may be discriminated against for example on the grounds of ethnic origin, skin color, gender, religion or its absence, nationality, sexual orientation, social background, age, physical or mental limitations, marital status, pregnancy, membership in trade unions or political affiliation, insofar as this is based on democratic principles and tolerance. You commit to hire, employ and compensate employees based on the principle of equal-treatment and fair conditions that are in line with applicable national laws and international employment standards.

Working time and remuneration

You commit to comply with all applicable laws and regulations on the maximum of working hours and the statutory minimum wage for a standard working week.

Freedom of association

You commit to respect the right of employees to join or form trade unions or other employee representation and to bargain collectively. In countries where this right is restricted by laws or regulations, alternative legitimate means for independent and free association and bargaining shall be supported.

Occupational Health & Safety

You commit to provide for a safe, secure and healthy workplace, including appropriate

machine safeguarding and personal protective equipment and not to tolerate physically or psychological inhuman treatment, physical punishment, discrimination, harassment, threats or retaliation.

Raw material supply chains

You commit to comply with all applicable laws and regulations and due diligence requirements regarding "Conflict Minerals" such as e.g. the Dodd-Frank Wall Street Reform and Consumer protection Act, Section 1502, the EU Conflict Minerals Regulation (EU Regulation 2017/821), the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas or any similar directives or regulations or national legislation, if applicable.

Resonac Graphite expects its suppliers to avoid using raw materials that do not meet the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or similar regulations or national legislation, if applicable.

Supplier commits to undertake appropriate measures to enhance transparency along the upstream supply chain of raw materials and to ensure that all smelters and refiners in its tantalum, tin, tungsten, gold or cobalt supply chain have a policy and process in place to ensure that any of these minerals manufactured by the Supplier do not directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses or contribute to human rights violations.

3. Environment

You commit to apply to all applicable laws and regulations for the protection of the environment. You especially commit to comply with all principles set forth in the following agreements:

1. Stockholm Convention of 23 May 2001 on persistent organic pollutants, last amended by the decision of 6 May 2005.
2. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their disposal of 22 May 1989, as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014.

You ensure to take appropriate measures and to

have a suitable environmental management system in place. You commit to environmentally-friendly dispose residual waste, chemicals and waste water, to minimize the use of hazardous materials, to ensure that those are safely handled, stored and disposed and prevented to be released to the environment, to use energy and natural resources efficiently. Suppliers are expected to continually looking for ways to minimize waste, emissions and discharge of your operations, products and services.

4. Monitoring, record keeping & audit rights

You commit to maintain documentation that demonstrates adherence to the Supplier Code of Conduct and to provide Resonac with all information and documents required to monitor compliance with the obligations of this Supplier Code of Conduct. Resonac also reserves the right to conduct risk based checks and audits of Suppliers to verify compliance with this Supplier Code of Conduct.

Resonac Graphite expects its Suppliers to report violations of this Supplier Code of Conduct by its employees and other persons acting on their behalf. Resonac Graphite reserves the right to take appropriate legal action (e.g. extraordinary termination of contractual relationship) if a Supplier of Resonac Graphite does not comply with this Supplier Code of Conduct or fails to disclose any violations. Major violations of this Supplier Code of Conduct may lead to the termination of the business relationship on short notice. Resonac Graphite reserves the right to claim damages for any damage caused due to violations of this Supplier Code of Conduct. It is up to Resonac Graphite's discretion to waive such right if the Supplier assures and provides evidence that appropriate improvement measures have been implemented.

For the purpose of disclosure of concrete potential misconduct by Supplier's employees and persons acting on behalf of Supplier, please report this by emailing:

http://www.RESONAC.co.jp/english/about/procurment/ethics_hotline.html

Supplier herewith declares the following:

“We have received Resonac Graphite’s Supplier Code of Conduct and by signing this document, we commit to comply with all provisions and principles in this Supplier Code of Conduct in addition to our contractual obligations entered into with any of the Resonac Graphite legal entities. We also commit to use reasonable efforts to obligate all our subcontractors involved in Resonac Graphite’s supply chain to also comply with these provisions.

In those cases where obligations have been agreed with the Supplier under written individual contracts that diverge from the principles in this Supplier Code of Conduct, such divergent obligations prevail.

We agree that the declaration to comply with all provisions and principles of this Supplier Code of Conduct shall be governed by the jurisdiction of the country of the Resonac Graphite contracting legal entity.

Place, date

Signature (Supplier)

Company seal

Name (in capitals), function