

Business Partner Code of Conduct (“BP CoC”)

SGL Carbon SE and its affiliates (“SGL Carbon”) are recognized as one of the leading carbon companies. Our aim is to provide our customers with products setting the highest quality standards while performing our work along legal, ethical and sustainable principles. Together with our Business Partners we want to set the standards in our industry.

Therefore, SGL Carbon has committed to a Code of Conduct that is binding for all its employees. As signatory of the UN Global Compact SGL Carbon commits to its principles and the core labor standards of the International Labor Organization (ILO standards). We expect all our Business Partners, including but not limited to suppliers, subcontractors, consultants, sales agents, distributors and others, to comply with these principles and ILO standards as well as to commit to legal, ethical and sustainable behavior while cooperating with SGL Carbon.

Compliance with Laws, Rules and Legal Regulations

We expect our Business Partner to comply with all applicable laws, rules, and regulations in the countries where they operate. This also includes any applicable law with international reach. In this regard, our Business Partner commits to the following:

Compliance with Antitrust laws

Business Partner strictly complies with all applicable antitrust laws and will not enter into any kind of anti-competitive activities or agreements and stand up against illegal cartels.

Compliance with Anti-Corruption

Business Partner commits to actively and vigorously counteracting any criminal or unethical influence on decisions of SGL Carbon employees, employees of other companies or public officials and to fighting any form of corruption in their company, including bribery, extortion and embezzlement.

Compliance with Export Control and Customs

Business Partner commits to providing services and goods on grounds of applicable export controls including without limitation sanctions, embargoes, and other laws, regulations, governmental orders and policies controlling the transmission or shipment of goods, technology and payments. Furthermore, Business Partner follows all customs regulations.

Compliance with Data Protection, Business Information and Intellectual Property

Business Partner respects the required privacy while using individual data, safeguarding sensitive information in all relevant processes and ensuring compliance with the applicable data protection laws.

Business Partner respects intellectual property rights of third parties and protects entrusted business secrets from unauthorized disclosure. This also includes fighting against plagiarism.

Compliance with Accounting standards and Anti-Money Laundering

Business Partner commits to financial integrity and to maintaining accurate and complete accounting records. Business Partner observes applicable anti-money laundering laws and has implemented respective measures to prevent any form of Money Laundering.

Avoiding Conflict of Interests

Business Partner commits to avoiding all direct or potential conflicts of interest while engaged

with SGL Carbon. Private interests and personal consideration shall not affect any business decision. If a private relationship with SGL Carbon employees exists (such as e.g. friendship or family relationship), the respective person should not be involved in a decision-making process.

Good Working Conditions and Human Rights

We expect our Business Partner to respect Human Rights and provide healthy and fair working conditions throughout their company. The Business Partner must treat all employees with respect and fairness and respect international human rights as set forth in the Universal Declaration of Human Rights and International Labour Organization (ILO) standards. In accordance with local laws these include but are not limited to:

- the prohibition of forced labour, including any forms of modern slavery and human trafficking
- the prohibition of child labour
- the prohibition of hazardous work for young workers under the age of 18 and respecting maximum working hours for young workers
- maintaining an inclusive and cooperative environment with no retaliation, free from violence or harassment
- the rejection of any form of discrimination in recruitment or employment practices, such as compensation, promotion, termination or retirement based upon but not limited to nationality, ethnicity, gender, disability, age, sexual identity or sexual orientation, religion and beliefs, color, maternity, or any other legally protected category
- the provision to fair remuneration and benefits paid in a timely manner, also following minimum wages provisions and in any case a living wage
- reasonable working hours, sufficient resting times and overtime within legally defined limits
- prohibition of violation of regulations in regard to safety at work of the respective place of employment
- respecting the rights of workers to freedom of association with trade unions and collective bargaining also in countries where this is not legally regulated
- responsible plant security practices at the sites

Safety and Health

We expect our Business Partner to operate its business in a safe and responsible manner based on systematic management approach including continuous improvement not limited to emergency management, fire prevention and responsible management of chemicals.

Business Partners are committed to providing a safe, healthy and ergonomic working environment that supports accident prevention and minimizes exposure to health risks by their employees and contractors. To that end, they must in particular:

- inform employees in the relevant language of identified hazards and the associated preventive and corrective measures put in place to minimize hazards
- conduct sufficient employee training on the prevention of work-related health disorders, prevention of accidents, exposure to heat and working in a hot environment, first aid, chemicals and fire safety
- provide suitable protective equipment and protective clothing free of charge
- install appropriate fire protection equipment such as fire detectors and fire extinguishers
- provide access to sanitary facilities and drinking water
- monitor and control work-related health hazards and the resulting protective measures

- label the chemicals used pursuant to Globally Harmonized System of Classification (GHS)
- store chemicals in line with national regulations

Environmental and Climate Protection

We expect our Business Partners to operate its business with responsibility towards the environment meaning the careful and efficient use of resources and to comply with all applicable national and international environmental standards and laws that apply to your location of business including required permitting.

Hazardous substances and waste

In addition, Business Partner commits to the responsible handling of hazardous substances and chemicals, to the sustainable and responsible utilization of resources e.g., water, energy, steam, fuel, to the recycling, reduction of waste and prevention of hazardous releases to the environment and to refrain from harmful noise. Business Partner shall ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled. The release of hazardous substances must be minimized. Business Partner shall prevent or mitigate accidental spills and fugitive emissions of hazardous materials. Business Partner must be committed to reduce waste and shall be able to prove respective counteractions as well as be committed to soil quality and shall ensure with regularly reported counteractions.

Climate protection and resource efficiency

Business Partner commits to reduce greenhouse gas and communicates about their set targets. Furthermore, our Business Partner drives for the efficient use of energy, water, raw material and with this promote good water, soil and air quality and reduce their degradation to the absolute minimum. The use of renewable resources and energy as well as the minimization of damage to the environment and health are all taken into consideration in the development, raw material extraction, manufacture, product life cycle including recycling.

In order to optimize their carbon footprints and reduce GHG emissions Business Partner shall use all natural resources (e.g., water, sources of energy, raw materials) in an economical way and preserve them. To ensure the conservation of renewable natural resources, Business Partner shall promote the application of broadly recognized sustainability standards and certifications that have been developed by multiple stakeholders. Negative impacts on the environment and climate caused by the suppliers or in their supply chain shall be minimized or eliminated at their source. Practices are encouraged to be in line with circular economy principles such as material reduction, substitution, collection, sharing, maintenance, reuse, redistribution, refurbishment, remanufacturing and recycling. Business Partner shall engage in the development and use of environmentally and climate-friendly products, processes and technologies. Business Partner shall ensure and demonstrate continuous environmental improvements, including a reduction in raw materials, energy, emissions, discharges, noise, waste and reliance on natural resources and hazardous substances by means of clear targets and improvement policies and a sustainable resources management system pursued on corporate level.

Responsible handling of substances and materials

Business Partner commits to avoid the use of substances and materials with adverse environmental or health impacts and must identify alternative environmental-friendly solutions. Business Partner must register, declare, and if applicable, obtain approval for substances pursuant to legal requirements in the respective countries. The provisions of the following conventions are to be adhered to:

- the Minamata Convention (on the use of mercury)
- the Stockholm Convention (on persistent organic pollutants), and
- the Basel Convention (on the control of transboundary movements of hazardous wastes and their disposal)

Furthermore, all other laws and specifications concerning hazardous materials, chemicals and substances that apply to your business location and/or market in question are fully respected at any time.

Responsible Sourcing

We expect our Business Partner to follow due diligence processes in order to identify, prevent and mitigate risk for negative human rights and environment impacts in their supply chain with regard to relevant raw materials – in particular tin, tantalum, tungsten, gold, cobalt and mica.

Business Partner avoids, if applicable, using raw materials from smelter or refineries 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. With this Business Partner confirms to not use Conflict Minerals, if applicable.

Rights of Local Communities

We expect our Business Partner to acknowledge and respect the existence of land, water and resources use rights in their neighborhood and to respect the rights of indigenous peoples and local communities.

Business Partner refrains from excess water consumption that significantly impair the natural foundations for the cultivation and the production of food. Business Partner observes the ban on the unlawful eviction from land, forest and waters when acquiring, building on or otherwise using land or forest that serve as a person's livelihood.

Supply Chain Due Diligence

We expect our Business Partners to address and pass on legally binding requirements in regard to human rights and environments impacts in their supply chain and specifically towards their tier-one suppliers and to conduct audits.

We further expect our Business Partners to cooperate and support us within our audits for ensuring the compliance with human rights and environmental requirements as well as in case of incidents to cooperate and support us in developing and establishing plans to minimize or terminate the violation of these obligations. In case of any incidents or suspicions of violation of data protections law requirements, business information or Intellectual Property Rights you shall report these to us immediately provided there is a connection to our business relationship.

Business Partners are encouraged – if not legally required anyhow - to publicly disclose the sustainable development impact of their operations, their goals, plans for stakeholder engagement, and progress.

Grievance and Complaints Mechanism

SGL Carbon encourages its Business Partner to seek guidance regarding the principles and standards in this Code. Business Partners are expected to report to SGL Carbon any concerns and disclose any violation against this Code, including sharing any information and findings about potential violations or misconduct of their own employees and suppliers and cooperating in any investigation. We will do our utmost to respect and protect any person who reports a potential violation of this Code. Retaliation is prohibited for our Business Partner who report wrongdoing in good faith and confidentiality of their identity will be ensured. For the purpose of disclosure, you should use the SGL Compliance Whistleblowing Channel. Anonymous reports are also accepted and processed to the extent possible.

SGL Whistleblowing:

SGL Carbon SE
Group Compliance Office
Söhnleinstrasse 8
65201 Wiesbaden/Germany
Email: confidential-compliance@sglcarbon.com
Phone: +49 (0)611-6029-236

Major violations as well as the failure to disclose such violations or the insufficient efforts to comply with the above principles and standards may lead to the termination of the business relationship on short notice. In such case, SGL Carbon reserves the right to claim compensation for any damage caused due to such violations.

Compliance with this Code of Conduct

SGL Carbon expects its Business Partner to work towards implementation of the principles and standards of this Code in the course of their business as well as in all companies working on their behalf. Furthermore, our Business Partner must take appropriate steps to also ensure compliance with these requirements by their own business partners and along their supply chain.

For the purpose of a mutually trustful and compliant business relationship, we expect our Business Partner to actively pursue compliance with this Code and, as a sign of their commitment, declare the following:

We have received SGL Carbon’s Business Partners Code of Conduct and, in addition to our contractual obligations, commit to its principles and standards.

Place, date

Signature (Business Partner)

Company seal

Name (in capitals), function