



# Code of Conduct

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# Editorial

## Dear colleagues,

Honesty, trust and appreciation – these are the values on which our corporate culture is based.

As a globally active company, we rely on the trust that people place in us. Employees, customers, business partners, shareholders, the public and we ourselves expect us to comply with applicable laws, respect ethical principles and act sustainably at all times and in all places.

Acting with integrity and respect means doing the right thing. That sounds easier than it often is in everyday working life. The legal complexity of global business is increasing, and compliance risks are on the rise. It is therefore important to align your own actions with clear principles.

Our Code of Conduct supports us in this, helping us to identify compliance risks and avoid violations of the law and internal regulations. It is a common set of values for all employees at all SGL sites worldwide.

Even a single violation of these rules by just one employee can cause lasting damage to trust in SGL Carbon and lead to considerable financial damage for the company as well as personal consequences for the individual.

It is therefore important to us that each and every one of us acts responsibly – the Board of Management, managers and all employees. We expect every employee at SGL Carbon to familiarize themselves with the Code of Conduct.

We on the Board of Management agree that compliance is non-negotiable.

## **The Board of Management of SGL Carbon SE**

**OUR**

**RESPONSIBILITY**

# Business Integrity

Trust and respect are the core of our activities – in our interactions with colleagues, and in our relationships with our customers, suppliers, the public, and all our stakeholders. Trust and respect must be earned again and again by complying with all applicable laws, internal guidelines and external regulations as well as demonstrating ethical principles. We have no tolerance for illegal or unethical actions.

SGL Carbon's Code of Conduct serves as the foundation of how we attain business integrity by guiding all our activities and decisions. It summarizes our shared values and defines the

binding principles for our daily actions and behavior. Our Code also details specific measures to take in situations where laws and regulations govern our actions.

We are aware that our behavior shapes the environment and society. As a company and as individual employees, we hold ourselves accountable and are committed to upholding the values and rules of compliant behavior set forth in this Code.

# Our Values

We bring our Values to life by complying with the law and being open, honest and considerate with each other and our stakeholders. We accept and respect diversity and individual differences by treating others as we want ourselves to be treated. Everyone in the company endeavors to keep their promises and take responsibility for their actions. We reward and recognize hard work with appreciation, and we treat each other with respect and trust. The combination of our Values enables SGL Carbon to achieve success. Our Values are woven throughout this Code of Conduct.

## SGL Carbon's culture

SGL Carbon's culture is grounded in certain beliefs that influence the way we operate, make decisions and pursue our goals. These beliefs are summarized in our core Values:

- Integrity and Honesty
- Respect and Appreciation
- Responsibility
- Trust
- Passion for Success

# Personal Responsibility

This Code of Conduct applies globally to all directors and employees, both management and non-management, in all SGL Carbon companies (jointly referred to as “employees”)

Compliance is, first and foremost, the individual responsibility of every employee. Each of us needs to ensure that our actions comply with this Code and all applicable laws. Everyone at SGL Carbon must know and understand this Code of Conduct. We ensure that periodic training is conducted to educate our workforce and to keep current with the ever-changing legal landscape.

SGL Carbon’s executive employees must serve as an example of the highest standard of legal and ethical compliance.

In the event of any doubts regarding our own conduct, we must seek advice and assistance as well as report any potential non-compliance matters.

# Prevention of Conflict of Interest

Our employees must conduct business transactions with the best interests of, and loyalty to, SGL Carbon, and must not be motivated by personal considerations, benefits or relationships.

Taking actions based on personal interests might make it difficult to objectively perform our duties and responsibilities to SGL Carbon and could impair our independent and sound judgment, creating a conflict of interest.

Transparency is paramount when it comes to potential conflicts of interest. If we suspect a possible conflict, we need to handle it properly by disclosing the matter to our supervisor or a member of the Compliance Network without delay. If and what actions need to be taken can then be decided and documented.

# Human Rights

As a multi-national, multi-cultural company, SGL Carbon respects human rights worldwide as described in the United Nations ["UN"] Declaration of Human Rights. As a signatory of the UN Global Compact, we follow its principles and the standards of the International Labor Organization ["ILO"] and respect the rights of our employees globally. These principles are, in particular:

- the dignity of the individual, the right to physical integrity and freedom of opinion
- the protection against discrimination in the selection, recruitment, employment, promotion and separation from employment/off-boarding of employees
- the prohibition of all forms of child and forced labor, including [modern] slavery and human trafficking

- the right to form employee representative bodies [freedom of association] and the right to collective bargaining, insofar as this is legally permissible and possible in the respective country,
- the commitment to fair compensation and working conditions in accordance with local market conditions and laws, and
- compliance with legal regulations related to employees, including working hours.

In our SGL Human Rights Declaration, we clearly communicate to all employees and business partners our commitment and expectation to follow these principles and actively support their implementation in our operations as well as in our supply chain.

# Sustainability

Our ambition is to positively shape the future by developing leading-edge carbon-based products for all industries and all aspects of life. In addition to providing products to our customers that help them contribute to more sustainability, we strive to ensure that our own manufacturing and management processes and our supply chains meet ambitious environmental, social and governance standards.

For us, sustainability is more than just corporate responsibility – it secures SGL Carbon's future growth and is a main pillar of our business strategy, our operations and our way of working.

As an energy-intensive technology company, we strive to minimize the impact of our business activities on the environment and the climate. We have therefore set ourselves ambitious targets to minimize our ecological footprint. We generally incorporate social and ecological aspects into our processes and decisions. We act responsibly along the entire value chain and comply with the applicable environmental laws and regulations.

# Community

As a global company, SGL Carbon operates in different countries and cultures. Therefore, we want to be a reliable partner both internationally and locally and assume social responsibility for local people beyond our business activities. Our employees and the regions in which we operate are our top priority, which is why we are particularly involved in the immediate vicinity of our own sites and primarily support projects that have a local or thematic connection to the company.

# OUR STANDARDS

# Employees



## Working Conditions

People are at the core of any successful company. At SGL Carbon, we focus on creating a workplace where our employees feel valued and safe. We aim to treat each other with respect and dignity and our efforts support a workplace culture where open communication and constructive feedback thrive.

SGL Carbon stands for reliability, fairness and appreciation. SGL Carbon is an equitable employer, offering all employees a fair compensation and taking steps to ensure we comply with legal regulations on working hours. Performance-based pay and attractive employee benefits are key remuneration elements. →

## Working Conditions

SGL strives to promote and support the compatibility of career and private life. SGL Carbon respects the right of each employee to join or form a labor union and elect works councils, with which the company will collaborate constructively.

While SGL Carbon encourages freedom of opinion, we do not tolerate bullying, harassment, or any form of abusive behavior. SGL Carbon is dedicated to the protection and promotion of human rights as described in our SGL Human Rights Policy.

## Diversity & Equity

As an international company, SGL Carbon aspires to be the employer of choice for diverse talents. We are committed to providing equal opportunities, fostering a sense of belonging, and nurturing mutual appreciation. We live a diverse and integrative working environment where trust, continuous learning, and knowledge-sharing are encouraged and valued. We value the unique backgrounds, perspectives, and personalities of our employees, and ensure they are treated with the utmost respect according to SGL Carbon's core Values.

## Equal Opportunities & Non-Discrimination

We provide equal employment opportunities to all employees and all applicants. Discrimination, harassment – including sexual harassment – or any behavior considered offensive, intimidating, or exclusionary is not tolerated at SGL Carbon and will be sanctioned accordingly. We are committed to creating an environment where every individual can develop their potential equally.

Protection against discrimination means that no one – whether an active or former applicant, employee, or business partner – may be favored or disadvantaged based on age, race, sex, pregnancy, national origin, social background, skin color, gender (identity), disability, genetic information, religion, belief or worldview, sexual orientation or any other characteristic protected by respective legislation. SGL Carbon complies with all applicable laws and applies these principles to all personnel decisions and

[disciplinary] actions, including selection and recruitment, employment and working conditions, training and qualification, internal relocation, promotion, remuneration, separation from employment, and the treatment of former employees.

At SGL Carbon, we are mindful every day of the above-described behaviors. We do not engage in, condone, or leave such behaviors unanswered. Treating each other with professional and personal respect aligns our actions with our Values. Additionally, our employees at all career levels serve as role models and are responsible for creating and maintaining a working environment characterized by trust, respect, appreciation, integrity, and honesty - free from discrimination, harassment, and bullying.

→ [Human Rights Policy](#)

## Employee Safety

As a global manufacturing company, we make occupational health and safety one of our top priorities. We strive to maintain a safe workplace for all employees and pursue a proactive approach to create safe and healthy working conditions. Compliance with applicable laws, prescribed processes, safe operating instructions and taking precautionary and protective measures is imperative. In the unfortunate event of unintentional violations or accidents, we take immediate steps and implement corrective procedures when needed. Our global goal is zero work-related injuries and illnesses.

As managers, we are role models and have the obligation to lead, instruct, train and support our teams accordingly, and to take appropriate measures to ensure that health and safety objectives are achieved. As employees, we take personal responsibility to work safely at all times and actively comply with internal procedures that support the required regulations. We encourage all employees to report any safety concerns so they can be reviewed and addressed.

→ [Global Health and Safety Policy](#)

# Business Partners and Third Parties



## Antitrust

Fair and free competition is the foundation for all our business activities. We are able to prevail in competition through the merits of our products and services. To safeguard this competitive environment, we comply strictly with the legal regulations that promote and protect fair competition. Dealings with our competitors and our business partners must be in compliance with applicable competition laws.

For this reason, we do not make any agreements – whether express or implied, formal or informal – with competitors to set down prices, terms of sale, divide up markets or regions (or agree not to manufacture certain products), limit production, influence the results of tender processes, poach employees or illegally collude in technical developments. The mere appearance of any such agreement or illegal conduct must be avoided. Any collaboration agreements on sustainability issues (“green agreements”) with competitors or on an industry level must first be carefully legally reviewed. →

## Antitrust

In principle, we do not make any agreements with distributors on resale prices unless some local jurisdictions permit such arrangements. Our employees must first seek advice from SGL Carbon's Group Legal team prior to proceeding with such relationship.

Actions other than agreements can also dilute competition. For this reason, the exchange or discussion of confidential information with competitors is prohibited. Such confidential information includes prices, price policies, terms of sale and performance, costs and profit margins, capacities, marketing strategies, territories, customers, salaries, research and development projects or other non-public information of relevance to competition.

While attending industry organization meetings where competitors will also be present, we observe the existing SGL Carbon rules on trade association meetings and fairs. Our employees should abstain from any other ancillary meetings or corresponding with competitors unless such meeting or correspondence has first been verified with the respective SGL Legal Counsel.

SGL welcomes fair competition. As a globally operating company, the majority of antitrust provisions in the various jurisdictions which we must observe and which concern further actions and conduct that restrain trade, are very complex. For this reason, each employee is obliged to always consult in advance with SGL Carbon's Group Legal team where a transaction or meeting may possibly constitute or create the appearance of a restraint of trade in any form.

→ [Global Antitrust Policy](#)

## Anti-Corruption

Corruption is any abuse of power, office or resources for private gain. Bribery is the intent to influence the recipient's conduct by giving money, gifts, hospitality or entertainment in order to gain an improper advantage or harm others.

Violations of anti-corruption and bribery laws can lead to costly investigations, reputational damage and criminal penalties against both SGL Carbon and the SGL employees involved. Persons found guilty of corruption face possible imprisonment as well as fines.

SGL Carbon values its relationships with its business partners. Only a good social contact can build trust and establish long-lasting business relationships. Therefore, SGL Carbon is committed to conducting business in a transparent and compliant manner and prohibits all forms of corruption and bribery in its business transactions.

Our employees must not promise or give any payments, inappropriate gifts or any other benefits to induce business partners, authorities or other public officials to provide SGL Carbon with an improper business advantage. This applies irrespective of location and culture.



## Anti-Corruption

SGL Carbon understands that relationships are dependent on social interaction with our business partners. Therefore, business entertainment, hospitality and gifts (jointly referred to as “benefits”) granted to or received from a business partner are not generally prohibited but they must be in accordance with our Anti-Corruption Policy and respect the rules of our business partners. In addition, any benefit must be adequate and also in compliance with the thresholds set forth in the Hospitality Spending Policy. In principle, granting benefits to public officials is not allowed except in very limited circumstances with prior approval.

Facilitation payments are payments made to speed up an administrative process for which the payee is already entitled and can be construed to be a form of corruption. SGL Carbon generally prohibits the payment of facilitation payments by our employees or third parties.

Furthermore, to avoid the perception of any corrupt behavior, SGL Carbon makes no contributions to political parties or individual officeholders or candidates for political offices. For this reason, our employees are also not allowed to make such donations on behalf of or in connection with SGL Carbon.

In addition, third parties must not be used to circumvent any of the principles set forth in our Anti-Corruption Policy. SGL Carbon has explicitly set up a Business Partner Compliance (“BPC”) process for our sales intermediaries to undergo a due diligence assessment prior to their contractual engagement. All such sales intermediaries must agree to SGL’s Business Partner Code of Conduct and our Anti-Corruption statement as part of their contract.

→ [Anti-Corruption Policy](#)

→ [Hospitality Spending Policy](#)

→ [Sponsoring and Social Spend Policy](#)

## International Trade and Export Control

As a global manufacturing company, SGL Carbon must buy and sell goods between countries for both internal and external purposes. The international movement of products contributes to a positive global economy but must be done in a manner that also promotes the safety of people worldwide. As such, SGL Carbon is committed to compliance with all applicable national and international global trade laws and regulations regarding export controls, customs compliance, and economic sanctions. We support all efforts to combat the misuse of dual use items and technology and to prevent the proliferation of weapons of mass destruction and terrorism.

→

## International Trade and Export Control

We implement compliance efforts for all internal and external commercial business dealings, financial transactions, technology transfers, and selection of business partners. If compliance efforts with global trade laws and regulations cannot be guaranteed, SGL Carbon will choose not to participate in a questionable business transaction.

SGL Carbon utilizes internal processes, procedures, and systems to successfully implement global trade compliance efforts. These steps ensure that goods, software, and technology are not accessible to unauthorized or illicit users and that SGL Carbon is only facilitating transactions with trusted Business Partners who are not involved in trafficking operations, forced labor/modern slavery, money laundering or terrorist activities. Our systems help keep our Global Trade team up to date on emerging threats. We also monitor accurate and timely filings of customs transactions and payment of any applicable duties and fees to relevant governmental authorities.

As employees, we contribute to SGL's Global Trade Compliance by staying informed and educated with periodic training and workshops as well as about the relevant Policies and Instructions. We focus on getting to know our business partners and maintaining precise and detailed records about our business transactions. Immediately reporting global trade related incidents supports mitigation of potential violations and allows us to expeditiously implement any needed corrective action. If any doubts arise in day-to-day business dealings, we shall seek guidance from SGL Carbon's Global Trade team.

[→ Global Trade Policy](#)

## Compliance in the Supply Chain

Business integrity only prevails if both sides of the transaction operate with an intense focus on legal, ethical and sustainable business conduct. For this reason, SGL Carbon has implemented a binding Business Partner Code of Conduct as the backbone for a trustful relationship and to make clear our expectations of third parties when conducting business. This particular Code applies to our suppliers, subcontractors and other business partners.

The principles contained in the Business Partner Code of Conduct must be adhered to and practiced within our business relationship. Global Procurement has implemented respective measures within their procurement processes to comply with all corporate supply chain due diligence obligations, such as risk assessments, selection process, performance evaluations and audits.

Supply chain compliance also includes observing the reporting and disclosure requirements for so called "conflict minerals" which means tin, tantalum, tungsten and gold sourced from conflict-affected and high-risk areas. SGL Carbon does not use conflict minerals in its products and production processes and expects the same from its business partners. →

# Finance and Capital Markets

## Compliance in the Supply Chain

SGL Carbon is committed to its management and improving the security of its supply chain. It is SGL Carbon's objective to work as a team with its business partners in order to solidify the security of our overall supply chain. As employees, we support this effort by adhering to the rules set forth in our Global Procurement and Conflict Minerals Policies. Following these processes ensures that our requirements and expectations for a sustainable supply chain and responsible sourcing are consistently met.

- [Business Partner Code of Conduct](#)
- [Conflict Minerals Policy](#)
- [Global Procurement Policy](#)



## Financial Integrity and Public Disclosure

The correctness and accuracy of accounting records, financial, and Environmental, Social and Governance (ESG) reporting form the framework for many of our decision-making processes.

Business transactions are required to be recorded in our accounting systems and subsequently reported in a timely, accurate and complete manner, all in accordance with established procedures and applicable regulations.

The financial reporting is prepared in accordance with local and international accounting standards and reflects the true and fair view of SGL Carbon's net assets, financial position, and results of our operations.

SGL Carbon further prioritizes open, correct and transparent sustainability reporting and communication to investors, employees, customers, business partners, interested members of the public and government institutions. Our employees are strongly encouraged to report any potential irregularities to ensure the integrity of our disclosures.

## Anti-Money Laundering

Money laundering is the deliberate attempt to move cash or assets derived from criminal activities into legal and legitimate financial activities. Money laundering is a major crime, and any involvement in it could have serious consequences not just for SGL Carbon, but also for individual employees.

We do not accept any cash payments and watch out for payment irregularities or suspicious behaviors, as we only want to do business with reputable partners who operate within the law, using resources from legitimate sources. SGL Carbon is obligated to report to the authorities any suspicious transaction or financial activity that becomes apparent to our employees. SGL Carbon will choose not to participate in any questionable business transactions where the source or recipient of funds cannot be verified.

At SGL Carbon, we take all reasonable measures to prevent our company from being used as a means to launder money. Carefully checking the identity and credentials of potential business partners and other third parties helps us to confirm who we are dealing with before contracts are signed or transactions occur.

→ [Anti-Money Laundering Policy](#)

## Handling of Insider Information

As a listed company, SGL Carbon is subject to capital market regulations. This also requires sensitive handling of insider information - internal information which, if it becomes public, could have a significant impact on the stock market price.

SGL Carbon encourages open and fair capital markets by protecting non-public information from inadvertent disclosure and misuse. We comply with all applicable laws and regulations. Insider trading includes, among other things, the use of insider information for trading in financial instruments or the recommendation to another person, either internally or outside the company (including family members and friends of an employee), to use insider information. SGL Carbon ensures that only our employees or authorized external insiders who absolutely need certain insider information for their work receive this insider information with strict instructions not to further distribute. Unauthorized disclosure or abuse of insider information is strictly prohibited.

In addition, prior to the issuance of our financial reports, our employees must not trade or recommend trading in SGL Carbon shares or related financial instruments for their own account or for the account of third parties (including family and friends) during defined, communicated black-out periods.

→ [Compliance to Capital Markets Laws Policy](#)

# Company Assets and Information



## Protection of Company Assets

Responsible corporate governance requires strong protection and due diligence when handling important assets in our daily business. These assets are represented by tangible items such as buildings, facilities, inventory, products, office equipment and computer systems, but also by intangible assets such as software, patents, trademarks, and other intellectual property rights, sensitive information, trade secrets and know-how.

## Anti-Fraud

To ensure compliant usage, SGL Carbon's assets, no matter how insignificant, may not be used for personal purposes. To protect company assets against fraud, SGL Carbon has implemented different measures such as approval processes, signature authority and delegation authorities as well as following our corporate governance documents for buying, selling and encumbering assets. In order for our anti-fraud measures to be effective, our employees must familiarize themselves with these rules and ensure they are followed.

## Intellectual Property and Company Secrets

Sensitive information includes all information related to research and development, patents and technological know-how, as well as trade and business secrets which are often developed over many years.

If an employee is unsure if something in their day-to-day activities is sensitive, we encourage them to ask the following question: Would disseminating the information directly to a competitor give the competitor an advantage or weaken either SGL Carbon's or a business partner's current or future position? If yes, such information is likely sensitive. Regardless, employees should seek advice from the SGL Carbon's Group Legal team as there may be a third-party non-disclosure agreement which may prohibit disclosure.

Our employees who handle sensitive information – irrespective if it originated within SGL Carbon or with one of our business partners – must never disclose such information to unauthorized persons. Unauthorized persons include family members, friends and acquaintances, but this also extends to unauthorized colleagues. This obligation to keep sensitive information confidential continues even after retirement or if an employee leaves the company. →

## Intellectual Property and Company Secrets

SGL Carbon thrives on innovation. Our employees serving as one of the many innovators pushing us forward must report an invention or novel technological idea to the Group Intellectual Property team in a timely manner. Likewise, if an employee becomes aware of a product or process on the market that infringes one of our patents, they must report it so we can protect those innovations.

Finally, our brands are SGL Carbon's face to the market. All SGL Carbon goods must be trademarked appropriately to claim our ownership. If we see or become aware of unauthorized use of one of our trademarks, we must report to protect our brand from counterfeit.

## Information Security

In the age of digitalization and artificial intelligence, information has become an easily available but also vulnerable asset. Companies and employees rely on sensitive information not being passed on, changed or destroyed without authorization.

It is irrelevant whether the information originates from the customer, the Human Resources department, production, research, engineering or the Information Technology department ("IT") itself, whether it is deleted after 90 days or has to be stored for years. The safeguarding of sensitive company information must be realized and ensured in all business processes.

Appropriate protection of information, applications and IT systems only works if each employee handles IT systems and data, and therefore SGL Carbon's knowledge and assets, responsibly and securely. Supported by information security guidelines and awareness campaigns on the one hand and technical precautions on the other, we must protect SGL Carbon's data in our daily work to be aware of potential dangers.

If a potential attack or unsafe behavior is suspected, SGL Employees need to report this immediately to the Information Security department.

→ [Acceptable Use Policy](#)

## We are required:

- to handle accessible information carefully and sensitively
- to support all efforts to protect SGL Carbon
- to work in a risk-minimized manner in order to find an appropriate balance between usability and security and to always be guided by the state of the art
- not to make any unauthorized IT-related decisions that could endanger the substance of SGL Carbon – this applies in particular to the acquisition of new production-relevant devices and machines
- to always acquire the necessary know-how for the secure operation of machines, IT systems and applications before they are put into operation

## Data Privacy

Personal data can be misused by unauthorized sources for illegal purposes such as identity theft, impersonation, gaining access to private accounts, using such data for unauthorized marketing and research, stealing money, committing crimes and discriminating or harassing individuals. Personal data includes personal information such as date of birth, government identification numbers, postal address or information about family, financial situation, health or the like of a person.

SGL Carbon protects the confidentiality of business information and personal information of all persons whose data we process. We gather, store and handle all confidential information/ personal data with care according to all applicable data privacy laws including, but not limited to, the European General Data Protection Regulations ["EU- and UK-GDPR"] and other national data protection laws of their member states, the United States' federal and state laws such as the Health Insurance Portability and Accountability Act ["HIPPA"] and the California Consumer Privacy Act ["CCPA"], China's Personal Information Protection Law ["PIPL"], and Japan's Act on the Protection of Personal Information ["APPI"].

Compliance with these statutory principles includes restricted access to and use of personal data, strict purpose limitations, minimization of data to what is absolutely necessary, accuracy and confidentiality of data, and secure deletion of personal data as soon as the purpose of processing has been fulfilled or a statutory retention period has expired, as well as the availability of data.

We take care to ensure that personal data is not disclosed inside or outside of SGL Carbon unless we are obliged under mandatory law or legally authorized or compelled to do so.

[→ Data Protection Policy](#)

## Communication and Social Media

The way in which we communicate has a major influence on the perception of SGL Carbon. A respectful and transparent dialog with our diverse internal and external stakeholders is the key to creating and maintaining understanding, acceptance and trust in our company and its activities.

Communication with the media, shareholders and investors is only carried out by the Board of Management or colleagues expressly authorized to do so (in particular Corporate Communications and Investor Relations). External inquiries must be forwarded to our Corporate Function "Investor Relations, Communication and Corporate Sustainability".

Employees who privately appear in public, such as via social media, or participate in a dialog in such a way that they could be perceived as an authorized representative of SGL Carbon, must clearly state that they are acting as a private person and not on behalf of SGL Carbon. When engaging in social media activities, we make sure that we always use our private e-mail address when setting up a profile. When commenting on posts about SGL Carbon and its activities, we always make it clear that it is our own opinion by using "I" and not "we".

Our employees posting on social media – be it on the external internet or even on the internal intranet mySGL – must never disclose company secrets or violate non-disclosure agreements. This includes never disclosing SGL's suppliers or SGL's customers without their consent, as well as SGL's internal know-how, such as process parameters or customer specific designs. In doing so, SGL Carbon maintains its commitment to protecting innovation and respecting its contractual obligations.

[→ Communication Policy](#)

# OUR SUPPORT

# Compliance Organization and Network

Group Compliance is centrally responsible to steer SGL Carbon's global Compliance Management System (CMS). Our CMS is comprised of several key elements including compliance culture, compliance objectives, compliance risks, compliance program, compliance communication, compliance reporting/auditing, and a compliance organization (Compliance Network). This is described in detail in our Compliance Manual.

The structure of the Compliance Network offers a decentralized contact person, the Local Compliance Representative ("LCR"), at each site to answer compliance related questions, provide guidance and act as a liaison between our employees and Group Compliance.

Additionally, the broader Compliance Network includes Business Unit and Corporate Functions Compliance Representatives to ensure our employees have numerous options from whom they can seek advice or report a concern. The most current overview of the Compliance Network is available internally under the "[Compliance](#)" section on mySGL.

This Code of Conduct defines the main areas of compliance-related business activities and provides basic principles for legal and ethical behavior aimed at promoting SGL Carbon's business integrity. However, this Code cannot cover and answer all questions or topics. Each employee is responsible for seeking guidance from Group Compliance or a member of the Compliance Network in order to ensure compliance.

→ [Compliance Manual](#)

# Whistleblowing

SGL Carbon fosters an environment of open and honest communication – which includes the raising of potential integrity issues within the organization. Our employees are encouraged to seek advice about appropriate ethical behavior, or raise any concerns regarding compliance-related matters, with their supervisor, Human Resources, Group Compliance, or any member of the SGL Carbon Compliance Network. Disclosing a case of possible violation of the Code to an appropriate person is encouraged and expected.

Anonymous reports will also be accepted and investigated to the extent possible with limited information. Additionally, the Whistleblowing system can be used to report potential risks of environmental or human rights violations. All reports are duly checked in accordance with the relevant regulations and

SGL Carbon policies. In particular, we ensure that any form of sanction, retaliation or discrimination against any SGL employee who discloses potential compliance concerns in good faith will not be tolerated, and the confidentiality will be protected to the maximum extent possible.

SGL Carbon will not tolerate any violation of any applicable laws or this Code. Failure to comply with any applicable laws or this Code may result in disciplinary actions up to, and including, termination.

→ [Whistleblowing Policy](#)

→ [Complaint Procedure Process](#)

# Documents

## Group Compliance Office

If you do not feel comfortable disclosing serious or potential compliance matters to your supervisor or LCR, you can use the confidential Whistleblowing system by contacting the central reporting office. This can be done personally or by telephone, letter or e-mail to the following address:

### **SGL CARBON SE**

Group Compliance Office  
Söhnleinstr. 8  
D – 65201 Wiesbaden

Phone: +49 (0)611-6029-236

E-mail: [confidential-compliance@sglcarbon.com](mailto:confidential-compliance@sglcarbon.com)

SGL Carbon maintains further local/regional reporting offices. Details can be found in the Whistleblowing Policy and on mySGL or on SGL Carbon's website.

The "Compliance" Intranet page on mySGL which can be accessed via the "Our Company" tab provides additional information, including the SGL Carbon Compliance Network with contact details, the relevant compliance-related Group Policies, frequently asked questions, training materials and other helpful information.

The most current version of SGL Carbon's Code of Conduct is published internally under the "Legal" section of our internal "Controlled Documents" on SharePoint and on mySGL under the "Compliance" section. All our employees must understand and acknowledge the Code of Conduct. The acknowledgement process for our employees is conducted via our SGL PEOPLE portal upon hiring. Periodic updates and training for the Code of Conduct will also be distributed through the SGL PEOPLE portal.

Our Code of Conduct can also be accessed by third parties on our SGL website: [www.sglcarbon.com/en/company/compliance/](http://www.sglcarbon.com/en/company/compliance/).

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