

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

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 Suppliers and Subcontractors 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 Suppliers and Subcontractors to comply with these principles and ILO standards as well as to commit to legal, ethical and sustainable behavior while cooperating with SGL Carbon. This applies especially for:

1. Integrity

You commit 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 your company, including bribery, extortion and embezzlement.

You commit to prohibiting and avoiding any kind of anti-competitive activities or agreements and you stand up against illegal cartels.

You commit to providing services and goods on grounds of applicable export controls and customs regulations.

You commit to maintaining accurate and complete accounting records.

You respect intellectual property rights and protect business secrets from unauthorized disclosure.

You respect the required privacy while using individual data, safeguarding sensitive information in all relevant processes and ensuring compliance with the applicable legal requirements.

You commit to avoiding all direct potential conflicts of interest while engaged with SGL Carbon. If a private relationship with SGL Carbon employees exists (such as e.g. friendship or family relationship), the employee should not be involved in a decision-making process.

2. Social

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

You commit to upholding the human rights of workers, treating them with dignity and respect, abiding by applicable stipulations regarding employment and labor conditions and fighting in particular human trafficking or slavery, forced labor, child labor and any kind of discrimination and harassment at your work place.

You hire, employ and compensate workers based on fair and legal criteria that are in line with applicable national law. You adhere to minimum wages and working hours in accordance with local laws and ensure the compensation for your employees supports a living wage according to local living conditions.

You respect the right to freedom of association and collective bargaining of your employees in accordance with applicable laws within the framework of the respective applicable laws and the conventions of the ILO.

You comply with and secure that your suppliers and subcontractors supply in accordance with applicable laws and regulations regarding "Conflict Minerals" such as e.g. the Dodd-Frank Wall Street Reform and Consumer protection Act (Section 1502) and the EU Conflict Minerals Regulation or any similar EU directives or regulations or national legislation, if applicable.

3. Environment

You commit to sustainable business and apply all applicable legal standards for the protection of the environment, including required permitting. You drive the commitment to reduce energy consumption and greenhouse gases, promote good water, soil and air quality,

and reduce their degradation to the absolute minimum. In addition you commit 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.

SGL Carbon expects its Suppliers and Subcontractors 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.

SGL Carbon encourages its Suppliers and Subcontractors to seek guidance regarding the principles and standards in this Code. Suppliers and Subcontractors are expected to report 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 cooperating in any investigation. We will do our utmost to respect and protect any person who reports a potential violation of this Code. Suppliers who report wrongdoing in good faith will suffer no retaliation. For the purpose of disclosure, you should use the SGL Compliance Whistleblowing Hotline where such disclosures can also be made anonymously:

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 damages for any damage caused due to such violations.

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

We have received SGL Carbon's Code of Conduct for Suppliers and Subcontractors and, in addition to our contractual obligations, commit to its principles and standards.

Place, date

Signature (Supplier/Subcontractor)

Company seal

Name (in capitals), function