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SUPPLIER CODE OF CONDUCT

AT GKN POWDER METALLURGY WE ALWAYS SEEK TO OPERATE TO THE HIGHEST ETHICS AND SUSTAINABILITY STANDARDS. WE CALL THIS “DOING THE RIGHT THING” AND WE APPLY THIS PRINCIPLE TO EVERYTHING THAT WE DO.

As a supplier to GKN Powder Metallurgy, you are integral to our success. We aim to develop and maintain relationships with our suppliers and in return expect our suppliers to also do the right thing. This means that in addition to providing the highest quality products or services, it is essential that you also operate your business in a way that supports our commitment to the highest ethics and sustainability standards.

To help you understand what we expect of you and your suppliers in practice, we have prepared this Supplier Code of Conduct which applies globally to all suppliers to GKN Powder Metallurgy. We require that you and all our other suppliers comply with this policy, regardless of any conflicting local business practices or social customs.

If you have any questions about this supplier Code of Conduct or about what is expected of you as a GKN Powder Metallurgy supplier, please speak to your local contact at GKN Powder Metallurgy. If you have any doubts or concerns about how you should behave in any particular situation, we would always prefer that you speak to us about them first.

DOING THE RIGHT THING - WHAT WE EXPECT FROM YOU

As a supplier to GKN Powder Metallurgy, you and your suppliers will:

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ETHICS AND SUSTAINABILITY STANDARDS

- Maintain high Standards of integrity, honesty, professionalism and fair-dealing.
- Not commit any act which may adversely impact GKN Powder Metallurgy's interests, reputation or good standing.
- Conduct your business in an open and ethical manner, with respect for human dignity and rights.
- Always have high standards of social environmental responsibility
- Respect and protect the environment, in compliance with the applicable legislation, including in relation to energy use, waste, emissions, water and resource consumption and management.
- Respect the integrity of any information we provide to you and only use it for the purposes for which it is provided.

BRIBERY & CORRUPTION

- Not engage in any practice which is, or might be perceived to be, corrupt or fraudulent.
- Neither pay nor accept (nor tolerate anyone else paying or accepting) any bribes, 'kickbacks' or other similar payments or inducements. This includes 'facilitation payments' made to facilitate or speed up official or governmental procedures.

YOUR EMPLOYEES & WORKERS

- Not use child labour or any form of forced, bonded or involuntary labour.
- Comply with all applicable labour laws and regulations and internationally accepted standards of workers' rights.
- Within the laws, customs and practices of the countries in which you operate, not unfair or unlawfully discriminate (including discrimination, amongst others, in hiring, compensation and training relating to gender, race, ethnicity, country of origin, nationality, colour, social and cultural background, religion, family responsibilities (including pregnancy), sexual orientation, age, disability) against any employee or worker, nor engage in actual or threatened physical or other abuse, corporal punishment or disciplinary practices such as physical, sexual or verbal harassment.
- Promote diversity in the workplace and create an environment where individuals are respected at work and are provided equal opportunities.
- Safeguard that all terms of employment meet at minimum legal requirements, and wages and benefits are at least national living wage level and paid on time, and maximum working hours as per national legislation and industry referenced standards are respected.

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OUR EMPLOYEES & WORKERS

- Avoid engaging with GKN Powder Metallurgy employees in a way which results in, or may be perceived to result in, an inappropriate conflict of interest for them. A conflict of interest can arise when the personal interests of a GKN Powder Metallurgy employee are inconsistent with the responsibilities of his or her position.
- Respect GKN Powder Metallurgy's position on gifts and hospitality. We prefer that you do not give GKN Powder Metallurgy employees gifts or gratuities. GKN Powder Metallurgy operates a corporate hospitality policy and GKN Powder Metallurgy employees may be required to decline gifts, gratuities or offers of hospitality which may be perceived as a bribe or inducement. GKN Powder Metallurgy employees are never allowed to request gifts and under no circumstances should you feel obliged to offer gifts or gratuities to a GKN Powder Metallurgy employee.

HEALTH & SAFETY

- Comply with all applicable health and safety laws and regulations. Provide a safe, clean and hygienic workplace for your employees and visitors (including GKN Powder Metallurgy employees). Where your employees are at a GKN Powder Metallurgy premises, ensure they operate and behave in an acceptable and safe manner, without presenting an undue risk to themselves, GKN Powder Metallurgy's employees or representatives, or others.
- Properly identify and assess all hazards and risks associated with the use of your products or services and ensure that adequate safeguards and working practices are in place to reduce or eliminate them.

THE ENVIRONMENT

- Conduct your business in a way which safeguards the natural environment. You will comply with all applicable international, national, and local environmental laws and regulations, including in relation to energy use, waste, emissions, water and resource consumption and management.
- Obtain and comply with all necessary environmental permits and properly dispose of all hazardous and regulated substances.
- Manage your energy use appropriately by implementing energy efficiency measures and reducing energy consumption where possible.
- Understand your impact on water and manage your water usage appropriately in line with the correct water stewardship practices.

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- Avoid causing environmental harm such as from pollution (to land or water), poor air quality, deforestation, land degradation and natural resource depletion and look to mitigate these issues where possible.
- Reduce your environmental impact, including through mechanisms which help to avoid any damage to local biodiversity and ensure that your operations and business activities do not contribute to deforestation.
- Manage resources such as metals and plastics appropriately and reduce waste going to landfill by implementing recycling and other waste reduction initiatives. When possible, use resources that are either recycled or can be recycled easily. Seek to eliminate unnecessary packaging, and where feasible take it back for re-use.

LEGAL COMPLIANCE

- Conduct your business in accordance with all laws and regulations of the countries in which you operate and to which you are subject, including but not limited to the examples set out below:
 - Comply with all applicable trade compliance regimes such as export, import, embargoes and sanctions.
 - Comply with all applicable anti bribery and corruption legislation. You must never engage in any form of bribery or other corrupt practices on behalf of GKN Powder Metallurgy.
 - Comply with all applicable anti-trust and competition laws. You must not fix prices or rig bids with your competitors, allocate customers or markets, or exchange current, recent or future pricing information with or between them.

OBSERVING THIS POLICY

- Have appropriate policies and procedures in place to enable you to fully comply with this policy. These need not be identical to this policy, but as a minimum they must be consistent with its principles.
- Provide GKN Powder Metallurgy with any information it reasonably requests to demonstrate your compliance with this policy and certify your compliance with this policy on request.
- Inform GKN Powder Metallurgy if you become aware of any actual or potential breach of this policy, whether by you or any other person or company.
- Have appropriate terms and conditions in your supply contracts to cascade these requirements down your supply chain.
- Allow GKN Powder Metallurgy employees and third party representatives to visit your premises and/or access your records and/or personnel on reasonable notice to audit and ensure compliance with the above requirements.