



## CARPENTER TECHNOLOGY CORPORATION

### HUMAN RIGHTS POLICY

Carpenter Technology Corporation (together with its majority-owned affiliates and subsidiaries, collectively the “Company” or “Carpenter Technology”) is committed to maintaining a culture rooted in respect for fundamental human rights, consistent with the Company’s Core Values. As such, Carpenter Technology seeks to conduct its business in accordance with the highest standards of ethical conduct and in compliance with all applicable laws, rules, and regulations. Our Company and this policy are guided by the human rights principles embodied in the UN Global Compact, the United Nations Universal Declaration of Human Rights (UDHR), United Nations Guiding Principles on Business and Human Rights, and core International Labor Organization (ILO) Conventions.

The principles set forth in this policy reflect the Company’s approach to ensuring socially responsible business practices and applies to all employees, including senior management. Carpenter Technology expects its suppliers, vendors, and other business entities with which it does business to act in accordance with the principles found in this policy.

The term “human rights” used in this policy refers to those internationally recognized human rights as set forth in the United Nation’s Universal Declaration of Human Rights and the ILO’s Declaration on Fundamental Principles and Rights at Work, which rights include, but are not limited to, the right to life, liberty, freedom of expression, freedom of association, right to collective bargaining, freedom from slavery and torture, and the right to work.

**Prevention of Human Trafficking and Forced Labor:** The Company opposes any use of slavery or human trafficking in the manufacture and distribution of its products including forced labor, prison labor, bonded labor, illegal child labor, domestic servitude, sex trafficking, and workplace abuse, or any use of force, fraud, coercion, abuse of power, or other means to exploit people. The Company will not tolerate or condone any form or practice that constitutes human trafficking or slavery in any part of its global organization. The ability of employees to move freely shall not be restricted through abuse, threats, or practices such as retention of passports, immigration documents, or valuable possessions in an unlawful manner and without their consent. Employees will not be required to pay any fees and costs associated with their recruitment. Employees will be made aware of the terms and conditions of their work in advance and be paid regularly as agreed.

**Child Labor:** Carpenter Technology will not employ anyone under the age of 16 in any position. Workers under the age of 18 should not perform hazardous work. Carpenter Technology is

committed to ensuring all labor practices are fully compliant with applicable state, local, federal and international laws and expects those with whom it does business to do the same.

**Environment, Health, and Safety:** Carpenter Technology strives to have a zero-injury workplace. The Company is committed to providing a safe, healthful, and secure work environment free from violence for the protection of its employees, products, materials, equipment, systems and information. Each employee of Carpenter is responsible for assuring compliance with applicable health and safety standards and regulatory requirements. Corporate policy establishes health & safety training requirements for all new employees in our manufacturing facilities and ongoing training to ensure compliance with relevant regulatory agencies, including U.S. Occupational Safety and Health Administration (OSHA), U.S. Environmental Protection Agency (EPA), and U.S. State Environmental Agencies, as well as Consensus Standards, and Carpenter Corporate Policies and Procedures, including, but not limited to, the Company policy prohibiting workplace violence.

The Company also recognizes water as a fundamental human right. Carpenter Technology respects the need for safe drinking water and need to ensure the protection of communities and ecosystems through pollution prevention strategies.

**Harassment Prohibition and Disciplinary Practices:** Carpenter Technology is dedicated to treating all employees with dignity and respect. The Company strives to maintain a work environment that is free from any type of harassment. Company policy prohibits harassment of any person by another employee, management representative, or business invitee from occurring in the workplace. All employees are expected to treat their coworkers, and employees of the Company's customers and suppliers, with dignity and respect. All employees, including all levels of management, will be subject to corrective action for violations of Company policy up to and including discharge, for engaging in harassment of employees, management, or business invitees.

**Diversity and Nondiscrimination:** Carpenter Technology is an equal opportunity employer and prohibits unlawful discrimination against applicants for employment and employees on the basis of age, race, color, ethnicity, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national or social origin, political affiliation, physical or mental disability, medical condition, genetic information, military or veteran status, or any other classification protected by applicable state, local, federal and international laws. To that end, we are dedicated to supporting women's and minority groups' rights. The Company seeks to ensure support of equal opportunities through training opportunities and the establishment of a Diversity, Inclusion and Belonging Committee overseen by Senior Management.

**Working Hours:** Carpenter Technology requires compliance with all applicable wage laws, including those related to minimum wage, working hours, rest periods and overtime work. The Company requires employee compensation to comply with applicable wage laws, including those related to minimum wages, overtime hours, and legally mandated benefits.



**Freedom of Association/Collective Bargaining:** Carpenter Technology recognizes that in many of the locations in which the Company operates, employees have the right to freely associate, or not to associate, with third party organizations such as labor organizations, as well as the right to bargain collectively in accordance with local laws without fear of reprisal or harassment. The Company respects these rights. Where employees are represented by a legally recognized union, the Company is committed to establishing constructive communications with their freely chosen representatives and bargaining in good faith. Further, the Company is committed to creating a culture in which employees can speak with their managers about their ideas, concerns or problems, and work together to address workplace issues. Carpenter Technology encourages our employees to communicate and share through a culture of collaboration, dignity, and respect.

**Training, Communication and Oversight:** Carpenter employees are trained on Carpenter's Code of Business Conduct and Ethics upon hire and undergo periodic training thereafter. The Company's Code of Business Conduct and Ethics reiterates the principles found in this policy and clearly defines standards of ethical behavior, policies, procedures, and legal requirements that apply to its business and employees. These standards are monitored and enhanced by senior management to further these principles and the Company's commitment to human rights and to conduct business ethically, honestly, and in compliance with applicable laws and regulations. Carpenter Technology's Board of Directors maintains overall responsibility for this policy and ethical business conduct.

**Reporting Violations:** Carpenter Technology encourages employees to embody these principles in the workplace and expects all employees to report any actual or potential illegal or unethical conduct or violation of Company policies, laws, or regulations at the Company. Carpenter Technology provides an anonymous, confidential third-party hotline for employees, customers, or suppliers to report any potential ethical violations. This confidential hotline gives all stakeholders an opportunity to voice concerns about an incident(s) they may have observed at Carpenter Technology. The incident could be of a legal, criminal, or personal nature. Employees can use the site to report concerns, or use the provided toll-free numbers, available 24/7 in multiple languages. Allegations are promptly investigated to mitigate or take appropriate corrective action, if necessary, in response to any adverse human rights violations. Carpenter does not tolerate any form of retaliation for reporting potential human rights violations.

**Remediation:** Remedy is an integral part of the corporate responsibility to respect human rights. Carpenter Technology seeks to identify and prevent human rights risks to employees in its business and is committed to providing effective reporting and grievance mechanisms and access to fair and equitable remediation. This Human Rights Policy is aligned with the Company's Code of Business Conduct and Ethics and Core Values.

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