



CARPENTER TECHNOLOGY CORPORATION

SUPPLIER CODE OF CONDUCT

Carpenter Technology Corporation is committed to conducting its business in an ethical, legal, and socially responsible manner. Carpenter Technology expects its suppliers, vendors, contractors, and subcontractors (collectively, "suppliers") to share this commitment and, therefore, has established this Supplier Code of Conduct guided by the core International Labor Organization (ILO) Conventions. We ask that Suppliers also review our [Core Values](#), [Carpenter Technology Code of Business Conduct and Ethics](#) and our [Human Rights Policy](#) and act in accordance with these principles.

COMPLIANCE WITH LAWS, REGULATIONS AND PUBLISHED STANDARDS

Carpenter Technology Suppliers must comply with all applicable laws, codes or regulations of the countries, states and localities in which they operate. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, and labor practices. In addition, Carpenter Technology Suppliers should also require their Suppliers, employees and contractors to adhere to these standards.

ETHICAL BUSINESS PRACTICES AND GLOBAL TRADE COMPLIANCE

Suppliers shall conduct their businesses in accordance with the highest standards of ethical behavior and in accordance with applicable laws, codes and regulations. Accordingly, Suppliers are expected to comply with applicable requirements in each of the following areas:

- **Anti-Corruption:** No funds or assets of the Supplier shall be paid, loaned or otherwise disbursed as bribes, "kickbacks", or other payments designed to influence or compromise the conduct of Carpenter Technology, its employees or representatives.
- **Foreign Corrupt Practices Act (FCPA):** While laws and customs vary throughout the world, Suppliers must comply with foreign legal requirements and United States laws that apply to foreign operations, including the FCPA. The FCPA generally makes it unlawful to give anything of value to government officials, foreign political parties, party officials, or candidates for office for the purposes of obtaining or retaining business
- **Antitrust:** We expect that our Suppliers uphold applicable standards for antitrust in their dealings with us and their partners. Antitrust laws protect the free enterprise system and promote open and fair competition. Such laws exist throughout the United States and prevent companies from engaging in business that is "in restraint of trade," such as price fixing and boycotting Suppliers or customers. The laws also prohibit pricing intended to run a competitor out of business; disparaging, misrepresenting, or harassing a competitor; stealing trade secrets, bribery, and kickbacks.

- **Export Trade Compliance:** Carpenter Technology expects our Suppliers to ensure that their business practices are in accordance with all applicable laws, directions, and regulations regarding the import and/or export of parts, components, and technical data.
- **Counterfeit Parts:** Carpenter Technology expects our Suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products.

CARPENTER TECHNOLOGY POLICIES AND PROCEDURES

Suppliers must comply with the Carpenter Technology 's published policies and procedures, including but not limited to:

- **Confidential and Proprietary Information:** Carpenter Technology expects its Suppliers to protect the confidential and proprietary information of others from unauthorized access, destruction, use, modification and disclosure. Suppliers will use appropriate means to safeguard Carpenter Technology and customer information, in accordance with the most stringent confidential information-protection requirements.
- **Data Privacy:** Suppliers must also comply with all applicable data privacy laws and assure extension of this requirement to all sub-tier sources they employ.
- **Conflicts of Interest:** We expect our employees, Suppliers and vendors to avoid personal or organizational conflicts of interest. Furthermore, we expect that situations that may present the appearance of a potential conflict be avoided. In the event that an actual or potential conflict of interest arises, notification must be given to all affected parties.
- **Maintain Accurate Records:** We expect that our Suppliers and others with whom Carpenter Technology conducts business to create accurate records and to not alter any record entry to conceal or misrepresent the underlying transaction it reflects. Suppliers performing work under government contracts must comply with the requirements set forth in FAR Part 4.703.
- **Intellectual Property:** Supplier will respect intellectual property rights. Supplier will transfer technology and know-how in a manner that protects intellectual property rights and conforms to the most stringent information protection requirements under the applicable agreements between Carpenter Technology and Suppliers.

ENVIRONMENTAL PRACTICES

Carpenter Technology is committed to be a good corporate citizen that benefits the communities in which we live and work. We require our Suppliers to comply with all environmental laws and regulations applicable to their operations worldwide. Please refer to our most recent [Sustainability Report](#) to become familiar with Carpenter Technology's environmental and sustainability efforts.

CONFLICT MINERALS

Carpenter Technology complies with the provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank) and corresponding enabling regulations regarding conflict minerals, including



regulations promulgated by the Securities and Exchange Commission. We require our Suppliers to comply with any reporting requirements associated with conflict minerals. Suppliers are required to comply with our Conflict Mineral Policy. Occupational Health and Safety Practices 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 our employees, products, materials, equipment, systems and information. We expect our Suppliers to comply with applicable health and safety standards and regulatory requirements. Suppliers should adopt policies establishing health & safety training requirements 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.

LABOR PRACTICES AND HUMAN RIGHTS

Carpenter Technology expects its Suppliers to adopt sound labor practices and adhere to the highest level of ethics when it comes to their own workforce. We expect our Suppliers to adhere to the principals in our Human Rights Policy, including:

- **Prevention of Human Trafficking and Forced Labor:** Carpenter Technology opposes any use of slavery or human trafficking in the manufacture and distribution of our 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. Carpenter Technology also opposes any practices that would restrict the ability for employees to move freely such as retention of passports, immigration documents, or valuable possessions in an unlawful manner and without consent. Our Suppliers must adhere to these same standards.
- **Child Labor:** Carpenter Technology does not tolerate any form of child labor. Suppliers 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 expects all Suppliers to ensure compliance with all labor practices and laws at the applicable state, local, federal, and international levels.
- **Minimum Wages:** Suppliers shall provide wages for regular and overtime work and benefits that meet or exceed legal requirements. ensuring all labor practices are fully compliant with applicable state, local, federal and international laws and expects those with whom we do business to do the same.
- **Working Hours:** Suppliers shall ensure compliance with all applicable wage laws, including those related to minimum wage, working hours, rest periods and overtime work. Suppliers are required to comply with employee compensation laws and regulations, including applicable wage laws related to minimum wages, overtime hours, and legally mandated benefits.
- **No Discrimination:** We expect Suppliers to prohibit 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.

- **Harassment Prohibition:** Carpenter Technology does not tolerate any form of harassment or abuse of employees, management representatives, or business invitees and strives to treat everyone with respect and dignity. This includes the prohibition of physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying or harassment of any kind. All Suppliers are expected to do the same.
- **Freedom of Association:** Suppliers shall recognize and respect the rights of its workers to join or to refrain from joining associations of their own choosing and the right to collective bargaining in accordance with local, state and federal labor laws and established practices.

EXPORT SANCTIONS/TERRORISM ACTIVITIES

Carpenter Technology's Suppliers must abide by all economic sanctions or trade embargoes that United States has adopted, whether they apply to foreign countries, political or to particular foreign individuals and entities. Suppliers must not directly or indirectly engage in or support any terrorist activity.

Neither Suppliers nor any of their affiliates, nor any officer or director of the Supplier or any of their affiliates, should be included on any lists of terrorists or terrorist organizations compiled by the United States government or any other national or international body, including but not limited to: (i) the U.S. Treasury Department's Specially Designated Nationals List, (ii) U.S. State Department's Terrorist Exclusion List, (iii) the United Nations List Pursuant to Security Council Resolution 1390 (2002) and Paragraphs 4(B) or Resolution 1267(1999) and 8(C) of Resolution 1333 (2000), and (iv) the European Union List Article (2)(3) of Regulation (EC) No. 2580/2001 on Specific Restrictive Measures Directed Against Certain Persons and Entities with a View to Combating Terrorism.

REPORTING VIOLATIONS

Carpenter Technology maintains an anonymous third-party administrator hotline for employees, customers or Suppliers to report any potential ethical violations which can be reached at 888-331-6523 (toll free). 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.

ASSESSMENTS

Supplier will periodically evaluate its operations and those of its subsidiaries, affiliates, and subcontractors to ensure compliance with this Code.

REVISIONS

This Supplier Code of Conduct may be revised or updated from time to time by Carpenter Technology. The latest version will be available on our website at Carpentertechnology.com.

APRIL 2023

