

Code of Conduct Statement

At Superior Graphite (SG), we are united by a shared commitment to our values – Balance, Customer Focus, Innovation, Integrity, Performance, and Respect. Our Code of Conduct guides the way we do our work every day. Our commitment drives our conduct via our policies, procedures, and systems.

Superior Graphite and its employees are committed to:

- Stewardship of a safe and respectful work environment for all employees:
 - Comply to all labor laws including:
 - Forced labor
 - Child labor and young workers
 - Wages and benefits
 - Working hours
 - Harassment and non-discrimination
 - Ensure the safety of our employees with attention to:
 - Personal protective equipment
 - Machine safety
 - Emergency preparedness
 - Incident and accident management
 - Handling of chemicals
 - Fire protection
 - Hazard assessment and mitigation
 - Ensure minimal impact to the environment:
 - By avoiding materials and methods posing environmental impact to air, water, land, flora, fauna.
 - By designing products and processes in such a way that energy, natural resources and raw material waste and residual products are minimized.
- Integrity in all business relationships:
 - Zero tolerance for corruption, extortion & bribery.
 - Deploy export controls.
 - Compete in a fair manner and with integrity.
 - Conduct activities in an ethical manner that does not conflict or appear to conflict with the interest of Superior Graphite and other stakeholders.
 - Support and respect the protection of internationally proclaimed human rights.
- Operational execution with a focus towards quality, environmental sustainability, information security and continual improvement:
 - Comply to all customer, legal and statutory requirements.
 - Ensure protection of personal information and intellectual property.
 - Aspire to improve effectiveness and efficiencies in all areas of our business.

All employees and business partners are encouraged to report any violations of this Code of Conduct to Management or the hotline without risk of retaliation.

Ethics and Compliance hotline: +1-800-603-2869 / www.lighthouse-services.com/superiorgraphite