

This document contains various policies and statements that are part of the Materion Corporation's commitment to global sustainability.

- [Responsible Business Alliance \(RBA\) Compliance](#)
- [Responsible Minerals Sourcing](#)
- [Human Rights Policy](#)
- [Anti-Money Laundering Statement](#)
- [Slavery and Human Trafficking Statement](#)

RESPONSIBLE BUSINESS ALLIANCE (RBA) COMPLIANCE

The RBA Code of Conduct (Version 8.0 – 2024) is a set of standards on social, environmental and ethical issues in the electronics industry supply chain. The standards set out in the RBA Code of Conduct (RBA Code) reference international norms and standards including the Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises, ISO and SA standards, and many more.

Materion supports these standards and is committed to complying with the principles outlined in the RBA Code. This commitment has been flowed to Materion suppliers through our Supplier Quality Manual and our Materion Supplier Code of Conduct. The sections below provide an overview of our company's commitment to the RBA Code.

SECTION A – LABOR

Materion is committed to respecting and upholding all applicable labor and employment regulations and guidelines in each location in which it operates and the human rights and dignity of our workforce worldwide. Materion meets or exceeds all labor and human rights guidelines outlined in the RBA Code.

SECTION B – HEALTH AND SAFETY

At Materion, the occupational health and safety of our employees is an important aspect of our business. Implementing appropriate practices and procedures is essential to keeping our workforce on the job and safe. To support our commitment to the occupational health and safety of our employees, Materion has developed and implemented a Health and Safety Management System (HSMS) to address occupational health and safety at our facilities; as well as developed long range plans to adopt the OSHAS 18001 occupational health and safety management system standard. In addition, critical health and safety metrics have been incorporated into Materion's performance measurements for all layers of the organization to demonstrate commitment to these standards.

SECTION C – ENVIRONMENTAL

Materion understands the importance of our environmental responsibility to our employees and the community. Incorporating practices and procedures that protect the environment into our manufacturing processes, not only protects the environment that we work and live in but also the entire organization and community. To support our commitment to environmental protection, Materion maintains certification with the ISO 14001 environmental management system standard. In addition, critical environmental metrics have been incorporated into Materion's performance measurements for all layers of the organization to demonstrate commitment to these standards.

SECTION D – ETHICS

Materion, its subsidiaries, employees, directors and executive officers are committed to observing the highest standards of ethics and integrity in all of our business operations and interactions. Materion also expects its suppliers, agents, contractors, business partners and consultants to maintain similar standards of ethics and integrity.

SECTION E – MANAGEMENT SYSTEMS

Materion has established a management system that aligns with the standards contained in the RBA Code. Our management system is designed to ensure compliance with all applicable laws, regulations and customer requirements related to our operations, products and services, to identify and mitigate operational risks associated with the RBA Code standards and to facilitate continuous improvement.

If you have any questions or would like more information about Materion's commitment to the RBA Code, please contact your Materion representative.

RESPONSIBLE MINERALS SOURCING

Materion is committed to responsible sourcing of minerals and ensuring that our products do not incorporate conflict minerals, which are minerals smelted into tin, tantalum, tungsten and gold sourced from entities that directly or indirectly finance or support conflict and other rights violations.

In support of this commitment, Materion has developed a Responsible Minerals Management System that includes specific roles and responsibilities, with executive-level oversight to ensure



effective implementation. More details on our management system and related activities can be found in the links below.

Materion is a member of the [Responsible Minerals Initiative](#) (RMI) and has also successfully undergone due diligence audits by RMI following the Responsible Minerals Assurance Process (RMAP) at both of Materion's operated smelter/refiner facilities in Buffalo (NY) for gold and Newton (MA) for tantalum. The RMAP due diligence audit program is a multi-stakeholder process led and supported by a cross section of industries,

including Electronics, Aerospace, Automotive, as well as governments, and other stakeholders. Downstream companies rely on the conformance of smelters and resultant Conformant products to comply with regulatory requirements under US Dodd-Frank 1502, EU 2017/821, and other regulations and requirements.

- Read more on Materion's [Conformant Gold Products](#)
- Read more on Materion's [Conformant Tantalum Products](#)
- [Click here](#) to view the 2022-2023 Materion Due Diligence Report
- [Click here](#) to view the 2022 Materion Form SD and Conflict Minerals Report
- [Click here](#) to view the 2022 Materion Responsible Minerals Sourcing Report for Ireland
- [Click here](#) to view the 2022 Materion Responsible Minerals Sourcing Report for Germany



MATERION HUMAN RIGHTS POLICY

PURPOSE

We believe that supporting and protecting the well-being of our employees, customers and communities is essential. Materion's Human Rights Policy ("Policy") refers to our responsibility and commitment to comply with all applicable laws and standards, related to labor practices and human rights, wherever we operate.

SCOPE

This Policy applies to all employees, officers and executives of Materion Corporation and its operations, subsidiaries and affiliates worldwide. Likewise, agents, consultants, suppliers, vendors, business partners and any other individuals or entities doing business on behalf of Materion must also comply with this Policy.

OUR COMMITMENT

We respect the human rights of every individual. We ensure that our working conditions are in compliance with all applicable laws and internationally recognized labor standards. Materion complies with all applicable laws relating to working hours, wages, other workplace standards, child labor, involuntary servitude and human trafficking. We also respect international human rights principles aimed at promoting and protecting human rights, including those outlined in frameworks such as the United Nations Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, OECD Guidelines for Multinational Enterprises, UN Declaration on the Rights of Indigenous Peoples, and ILO International Labor Standards such as ILO Convention 169 on Indigenous Peoples as well as our commitment to principles of free, prior and informed consent. Further, Materion is committed to complying with the standards set out in the Responsible Business Alliance (RBA) Code of Conduct.

Our [Materion Code of Conduct](#) provides additional detail regarding our principles, commitments and responsibilities to each other, our customers, our shareholders and the communities in which we operate.

We also expect our suppliers, vendors and other business partners to share our respect for, and commitment to, human rights and to conduct their business activities in compliance with our [Supplier Code of Conduct](#).

Child and Forced Labor

We strictly prohibit the use of child or forced labor, including modern forms of slavery and human trafficking in all of our global operations or facilities, and our sites and operations verify the age of employees at the time of hire. Materion also prohibits any form of child or forced labor in our supply chain. Materion suppliers are required to comply with all applicable laws and regulations regarding child and forced labor and slavery and human trafficking.

Fair Labor Practices

We are committed to providing competitive, fair and equitable wages aligned with local market practices and living wage principles. We compensate our employees competitively relative to the industry and our local labor markets. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws and to the terms of applicable collective bargaining agreements. We also offer our employees the opportunity to improve their capabilities through training and other skills development initiatives.

Freedom of Association

We respect our employee's rights to freedom of association and assembly. We comply with rules regulating the employer-employee relationship, including laws relating to codetermination and works councils.

Diversity, Equity and Inclusion

We value diversity and inclusion in the workplace and prohibit all forms of harassment and discrimination. As one of our core values, we are committed to fostering diversity and inclusion throughout our organization. We support women's and minority groups' rights and we are dedicated to promoting and maintaining a culture of equal treatment and opportunity, regardless of ethnic or racial status, color, nationality, ancestral origin, religion, class, gender, age, disability or veteran status, physical characteristics or appearance, sexual orientation, gender identity, union membership, or political affiliation.

Environmental, Health & Safety

Ensuring the health and safety of our employees, contractors, customers, and the public is one of our core values. We conduct our business in a safe manner and comply with all applicable health and safety laws and regulations. We recognize the right to water as a fundamental human right. We respect the human need for sustainable water supplies, safe drinking water, and we work to ensure protection of both ecosystems and communities in which we operate. Our commitment to working in a safe and healthy environment is further described in our [Environmental Health and Safety Policy and Principles](#).

COMPLIANCE WITH THIS POLICY

Compliance with this Policy is mandatory and is vital to the business interests of Materion. Annual training is provided to employees on the Materion Code of Conduct and addresses respect for, and compliance with, the human rights concerns contained within this Policy.

Employees, suppliers, business partners and other stakeholders are responsible for reporting suspected violations of this Policy. Employees, suppliers, business partners and other stakeholders have a number of resources available to make a report, including anonymous reporting through our [Materion Ethics & Integrity Hotline](#). Our anonymous reporting systems are available 24 hours, 7 days a week and are managed by an independent third party. Materion has a zero-tolerance policy for retaliation. Any employee found to have engaged in retaliatory acts will be subject to disciplinary action, which may include termination of employment.

ANTI-MONEY LAUNDERING STATEMENT

It is the policy of Materion Advanced Materials Technologies and Services Inc. and its subsidiaries (Company) to prohibit and actively prevent money laundering and the funding of terrorist or criminal activities. We define money laundering as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets.

Our policy has been developed in conformance with the requirements of rules promulgated by the U.S. Department of Treasury, Financial Crimes Enforcement Network, 31 CFR Part 103, Section 120.140c, under the Bank Secrecy Act. Our policy is based on four principles which are embodied in our Anti-Money Laundering (AML) Program (the program):

- Establish policies, procedures and internal controls based on our assessment of the risks associated with our business activities
- Appoint an AML Committee, led by an AML Compliance Officer who is responsible for ensuring that (i) the program is effectively implemented; (2) the program is updated as necessary to reflect changes in risk to the business unit, current requirements of applicable regulations and further guidance provided by the U.S. Department of Treasury; and (iii) appropriate staff are trained in the program and related procedures.
- Conduct independent testing to ensure the program is functioning as designed.
- Encourage all employees to report suspicious activity to the AML Compliance Officer

For more information regarding Materion's AML Program and related procedures, email the AML Compliance Officer at KYC-Compliance@materion.com.

SLAVERY AND HUMAN TRAFFICKING STATEMENT

The California Transparency in Supply Chains Act of 2010 requires companies doing business in California to disclose efforts to eliminate slavery and human trafficking from their supply chains. Likewise, the UK Modern Slavery Act 2015 requires commercial organizations to disclose the steps they have taken to ensure there is no modern slavery or human trafficking in their own business and their supply chains. This statement details the systems and controls that Materion has in place to safeguard against slavery and human trafficking in its business and supply chain.

Materion Corporation, including its subsidiaries and affiliates (“Materion”), is committed to ensuring that its employees and suppliers have processes in place to mitigate the risk of human trafficking and slavery from occurring in its business and supply chain.

MATERION CORPORATION: PRODUCTS AND SUPPLY CHAIN

Headquartered in Cleveland, Ohio, Materion is an Electronic Materials supplier engaged in the design, development and manufacture of state-of-the-art products and services. Materion operates in 35 locations worldwide, employs over 3,000 employees, serves customers in more than 50 countries and manages a global supply chain of suppliers, contractors and business partners. The majority of Materion’s supply chain partners are located within the United States, but many suppliers, contractors and business partners are located outside the United States.

Materion’s product portfolio is organized into three business groups: the Performance Materials and Composites group, which includes specialty metals; the Electronic Materials group, which includes the production of high-purity materials; and the Precision Optics group, which includes optical coatings and products.

For additional information about our business segments, including the wide variety of products manufactured in each segment, visit materion.com.

VERIFICATION OF THE SUPPLY CHAIN

Supplier Code of Conduct: Materion prohibits any form of forced labor, including slavery and human trafficking, in our supply chain, and has issued the [Materion Supplier Code of Conduct](#) (the “Supplier Code”). The Supplier Code specifically forbids the use of involuntary or forced labor, including unlawful child labor, and requires that suppliers comply with all applicable laws and regulations regarding slavery and human trafficking. The Supplier Code also requires

suppliers to ensure that their subcontractors and agents comply with the Supplier Code and have adequate monitoring and record keeping systems in place to ensure compliance. In addition, Materion requires that suppliers annually acknowledge their understanding of, and compliance with, the Supplier Code. Under the Supplier Code, Materion reserves the right to monitor, review and verify compliance with the Supplier Code. Any concerns relating to potential noncompliance with the Supplier Code are investigated promptly. .

Responsible Minerals Sourcing: Materion is committed to conducting business so as to protect people and has issued a [Responsible Minerals Sourcing Policy](#) which addresses our commitment to respect human rights and not contribute to conflict or other forms of corruption, which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (CAHRAs) This is in accordance with U.N. resolutions and Section 1502 of the Dodd Frank Act. Materion will only purchase materials such as tin, tantalum, tungsten, cobalt and gold from sources that are not involved in or contributing to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of the Organization of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas. Materion successfully completed an audit conducted under the Responsible Business Alliance (RBA) Responsible Minerals Initiative (RMI) and is included on the RMI list of Responsible Minerals Assurance Process (RMAP) Conformant Smelters and Refiners for Gold. The RMI program is a global initiative developed to provide a credible system for companies to substantiate responsible minerals sourcing.

INTERNAL ACCOUNTABILITY STANDARDS

Materion will never use forced, indentured or involuntary labor in any of our operations, nor will it tolerate any instances of slavery or human trafficking. Materion will also never conduct business with any third parties who engage in human trafficking or other forced labor. This commitment is set forth in Materion's [Human Rights Policy](#), which refers to our responsibility and commitment to comply with all applicable laws and standards, related to labor practices and human rights, wherever we operate.

Materion's pledge and responsibility towards human rights is also encompassed in Materion's [Code of Conduct](#) (the "Code"). The purpose of the Code is to ensure that Materion conducts business with the highest standards of ethics and integrity and that all Materion employees, officers and directors comply with all company policies, applicable laws and regulations. Any employee, officer, director or supplier who violates these policies is subject to discipline, up to and including termination.

Employees are obligated to report suspected violations of the Code. Employees have a number of resources available to report misconduct, including anonymous reporting through our Ethics & Integrity Hotline and Ethics Website. Our anonymous reporting systems are available 24 hours, 7 days a week and are managed by an independent third party. Any concerns relating to potential noncompliance with Materion's Code are investigated promptly. Materion has a zero-tolerance policy for retaliation. Any employee found to have engaged in retaliatory acts will be subject to disciplinary action, which may include termination of employment.

TRAINING

Annual training is provided to employees on the Materion Code of Conduct. This training addresses the mitigation of the risk of slavery and human trafficking within the supply chain. The employees and management who have direct responsibility for the supply chain are aware of their obligation to mitigate these risks and are empowered to immediately address and resolve any event of potential noncompliance.

Jugal Vijayvargiya
President and Chief Executive Officer

*The Board of Directors of Materion Corporation approved this statement at its board meeting held on May 6, 2021.
This is Materion Corporation's statement for the financial year ended December 31, 2020.*
