



Supplier Code of Conduct

DOC-221837, Revision # 2 (May 2, 2025)

PURPOSE

The purpose of this Supplier Code of Conduct is to clearly communicate Materion's expectations regarding ethical, legal, and socially responsible business practices to all suppliers, contractors, and business partners. This Code serves as a framework to ensure that all parties conducting business with our organization uphold the highest standards of integrity, comply with applicable laws and regulations, and support our commitment to sustainability, human rights, and fair labor practices. By aligning with these principles, we ensure a collaborative effort towards ethical and sustainable business practices.

SCOPE

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

POLICY

Legal Compliance

Suppliers must comply with all laws and regulations in their country of operation, and with all other applicable laws and regulations.

Business Integrity

Bribes, kickbacks, illegal political contributions or other improper payments to customers, government officials or third parties are strictly prohibited. Suppliers must not directly, nor indirectly, give or receive improper business advantage by giving or receiving anything of value in exchange for preferential treatment. [Materion's Code of Conduct](#) prohibits Materion employees from soliciting personal gifts, money, loans or personal discounts from Materion suppliers and from engaging in any business entertainment that is not customary or reasonable in value.

Anti-Corruption

Suppliers must comply with the U.S. Foreign Corrupt Practices Act (FCPA), as well as other applicable anti-corruption laws and regulations within their country of operation. Materion has a strict, zero tolerance policy for corruption. Ensuring compliance with anti-corruption laws is vital to the business interests of Materion. This principle applies to all Materion transactions worldwide-without exception.

Human Rights

Materion is committed to complying with all applicable laws and standards, related to labor practices and human rights, where we operate. Suppliers are expected to share our respect for, and commitment to, human rights and to conduct business activities in compliance with the [Materion's Human Rights Policy](#).

Child Labor

Suppliers must comply with local laws regarding the minimum age of employees. In addition, Suppliers must comply with all legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, working conditions, and the handling of certain materials.

Forced Labor and Human Trafficking

Suppliers shall not use any form of involuntary or forced labor or indentures, bonded or prison labor. Suppliers shall not use, condone nor participate in any form of slavery or human trafficking.

Harassment

Suppliers must treat all employees with respect and dignity. No employees shall be subject to corporal punishment, physical sexual, psychological or verbal harassment or abuse.

Non-Discrimination

All terms of employment-including hiring, payment, benefits, training, promotion, termination, and retirement should be based on an individual's ability to do the job and performance. Suppliers shall not discriminate against employees based on age, disability, ethnicity, marital or family status, national origin, race, color, religion, sex, sexual orientation, or any other characteristic protected by law.

Wages, Benefits and Working Hours

Suppliers must provide wages at least equal to the applicable legal minimum wage and any associated benefits. If there is no legal minimum wage, suppliers must ensure that wages are at least comparable to those at similar companies in the local area or to prevailing industry norms. Suppliers must not exceed prevailing local work hours and must appropriately compensate overtime. In addition, except in extraordinary business circumstances, all workers are entitled to at least one day off every seven-day period.

Health and Safety

Suppliers must provide employees with a safe and healthy working environment that includes appropriate controls, safety procedures, preventative maintenance, and protective equipment. Practices must comply with all relevant local and national laws. Suppliers must implement management systems to meet these requirements.

Freedom of Association

Suppliers must respect the legal rights of employees to join or refrain from joining worker associations. Suppliers must also respect any legal right employees to bargain collectively.

Protection of the Environment

Suppliers are expected to operate in a manner that is protective of the environment. At a minimum, suppliers must fully comply with all applicable environmental laws applicable to the workplace, the

products produced and the methods of manufacture. Suppliers should further strive to conduct their operations in a way that minimizes exposure to potentially hazardous materials, conserves natural resources, and encourages development of environmentally friendly technologies.

Counterfeit Materials

Suppliers shall establish systems that will stop any counterfeit products or material from being introduced into the supply chain.

Responsible Minerals Sourcing

Suppliers shall ensure that their products containing minerals such as tin, tantalum, tungsten, gold, or cobalt are obtained from sources that are not involved in, or contributing to, illegal armed groups, human rights violations or financial wrongdoings in Conflict Affected and High Risk Area (CAHRAs), including the direct or indirect financing of armed groups in the Democratic Republic of the Congo (DRC) or an adjoining country. Suppliers are expected to exercise due diligence on the source and chain of custody of such minerals in accordance with generally accepted international standards, and in accordance with the [Materion's Responsible Minerals Sourcing Policy](#). Suppliers shall provide information on their due diligence activities upon request.

Protecting Intellectual Property

Suppliers must respect intellectual property rights and safeguard all Materion's confidential and proprietary information.

Conflict of Interest

Suppliers shall act fairly, objectively and avoid all conflicts of interests when doing business with Materion. This includes even the appearance of any potential conflict of interest. Suppliers are expected to report any potential, perceived, or actual conflict of interest that may arise in the course of business with Materion.

Fair Competition and Antitrust Compliance

Suppliers must comply with all applicable competition and antitrust laws and regulations when conducting business. Materion is committed to providing only honest and truthful information and Materion will not engage in any illegal activity or behave in an unethical manner when conducting business. The same level of commitment is expected of our suppliers.

Trade Compliance

Suppliers involved with the sale and distribution of Materion's products and services are expected to know and follow all applicable export and import control laws and Materion's policies regarding trade compliance.

Accurate Accounting/Records Management

Suppliers are expected to maintain accurate and complete business records. Records such as company reports, accounts, financial statements, regulatory reports and publicly files documents should comply with all applicable and acceptable accounting principles and statutory requirements.

Suppliers and Subcontractors Assurance of Compliance

Suppliers should adopt or establish a management system designed to ensure compliance with this Code and applicable laws and regulation, identify and mitigate related operational risks, and facilitate continuous improvement in these matters.

In addition, suppliers are expected to have adequate monitoring and record keeping systems to verify compliance. Suppliers are also responsible for ensuring that their subcontractors and agents comply with this Code. Materion reserves the right to monitor, review and verify compliance with this Code.

Anonymous Reporting and Whistleblower Protection

Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances and illegal or unethical conduct. Suppliers shall protect whistleblower confidentiality and prohibit retaliation.

RBA Compliance

Materion supports the Responsible Business Alliance (RBA) Code of Conduct and is committed to complying with the principles outlined. We also expect our suppliers to fully comply with the RBA Code, implement and maintain robust management systems to ensure adherence to its principles, and to continuously monitor and improve their practices. Suppliers must demonstrate their commitment to these standards through transparent reporting and providing evidence of compliance upon request. For more detailed information, please refer to our [RBA Compliance Statement](#).

COMPLIANCE WITH THIS POLICY

Suppliers must report known violations of this Code to Materion. To report violations of this Code by suppliers, subcontractors, employees or any representative doing business on behalf of Materion, please contact Materion's Director of Ethics & Compliance at suppliercompliance@materion.com. You may also report via the Materion Ethics & Integrity Hotline at (888) 588-5468 or online at www.materion.ethicspoint.com. Supplier shall be responsible to Materion for all costs and damages arising from any violation of this Code. Materion reserves the right to discontinue doing business with suppliers found to be in violation of this Code.

Additional supplier requirements can be found in [Materion's Supplier Quality Manual](#).

COMMUNICATIONS AND TRAINING

Materion makes this Policy and all other Policies accessible to all employees, officers and executives of Materion. Materion promotes internal understanding and awareness of this Policy through training and knowledge sharing.

POLICY REVIEW

This Policy will be reviewed, implemented, and enforced by Materion as appropriate. Executive management ensures the review of this Policy will occur as necessary as a part of its business planning and review processes, and the line of organization has functional ownership in order to drive employee involvement at all levels toward the achievement of documented, clearly defined and measurable goals and objectives.