

RESPONSIBLE PURCHASING POLICY

GrafTech, as a market leader in graphite electrode manufacturing, holds its ethical conduct and sustainability as fundamental to its business strategy and culture.

We will work with our suppliers to:

- Operate and increasingly rely on a lean supply chain that has adopted sustainable business practices and supports our sustainability program.
- Develop procurement solutions in line with customers, regulatory authorities', and wider stakeholders needs and expectations.
- Create long-term value and reduce risk for its business, suppliers, and stakeholders.

We plan to achieve these objectives by setting responsible and sustainable procurement standards, by collaborating, innovating, and embedding sustainable sourcing and purchasing into our business processes, assessment methods and performance indicators.

1. Purpose

GrafTech's Responsible Purchasing Policy ("RPP") establishes how we intend to work with our suppliers to ensure that our supply chain meets the health and safety, human rights, ethical, and environmental expectations set out in this RPP. This RPP is an integral part of our procurement process and will drive transparency and continuous improvement in our procurement program. We encourage our suppliers to adopt best practices applicable to their respective industries and to work with us to identify and develop further improvements around sustainability to our procurement program.

2. Scope

This RPP applies to our procurement activities, to our suppliers, and their affiliates, contractors and subcontractors, and applies to all products and services that are integral to our supply chain. We encourage our suppliers to promote the requirements of this RPP within their own supply chain.

GrafTech defines our supply chain as the goods and services purchased for and utilized in or supporting our operations, which includes carbon products, decant oils, chemicals, electricity, natural gas, and various other minor raw materials, which are known as primary input materials.

Responsible Purchasing is a key principle both in our procurement and sustainability approach and will be given systematic consideration alongside factors such as price, on time delivery and quality.

3. Our Commitment to Suppliers

GrafTech intends to:

- Engage with suppliers to identify and acknowledge Sustainability and/or Environmental, Social and Governance ("ESG") programs.
 - This may include joint or third-party assessments, such as surveys, audits, or site visits, to evaluate performance against defined and agreed upon standards such as this RPP, GrafTech's Code of Conduct and Ethics for Suppliers and Contractors, the suppliers' own ethical guidelines and codes of conduct and appropriate sectorial sustainability standards.

- Encourage suppliers to identify activities that fall below expectations listed in this RPP (Section 4) and provide feedback, where appropriate, to help them to develop improvements in their practices in a timely manner.
- Prioritize and focus attention on those parts of the supply chain where the risk of not meeting the expectations listed in this RPP (Section 4) is highest and where the maximum improvement can be made.
- Conduct our business with suppliers in a fair, objective, transparent and professional manner.
- Promote and act as an advocate for sustainable supply chain practices within our industry and increasingly rely on a supply chain which has adopted strong and sustainable business practices.
- Communicate and train our employees responsible for procurement on the guidelines established in this RPP.
- Regularly review and update our policies and practices to ensure they help to reduce risk in our supply chain, contribute to our responsible and sustainable procurement vision and to our sustainability reporting.

4. What we Expect from our Suppliers

We expect suppliers to meet the requirements described in this RPP and GrafTech's Code of Conduct and Ethics for Suppliers and Contractors, and to apply these expectations within their respective supply chains.

Suppliers are encouraged to collaborate both in their respective industries and with us to identify further opportunities to improve sustainable business practices in the areas of health and safety, human rights, ethics, and environmental stewardship along the supply chain.

- **Health and Safety**

We are committed to a culture of "No Harm Done" – striving to achieve zero injuries, and to promote the general wellbeing in the workplace and beyond.

We encourage our suppliers to adopt health and safety management practices which safeguards their employees and contractors, and their overall supply chain. Suppliers are required to comply with our health and safety policies as well as applicable regulatory health and safety laws, rules, regulations, and standards. Protection of all personnel is paramount to every aspect of the services performed by suppliers, whether these services are performed by the supplier on our premises or elsewhere.

- **Human Rights**

We respect all human rights of employees and the communities in which we operate, and we are committed to promoting these principles to our suppliers. We encourage our suppliers to develop and implement policies and procedures to ensure respect of all human rights in their businesses and those of their suppliers.

The supplier must always comply with the most demanding requirements, whether relevant applicable laws, the Code of Conduct and Ethics for Suppliers and Contractors, or this RPP.

- **Ethics**

We are committed to apply fair, ethical, and transparent business practices.

We do not buy materials and services that do not comply with national or international laws and conventions, including anti-corruption, money laundering and sanctions-based export controls. We are committed to using raw materials and industrial products of legal origin.

We maintain a due diligence process to achieve compliance with this commitment and intend to request relevant suppliers to fully support us in this effort.

We expect our suppliers to maintain and enforce a company RPP requiring adherence to ethical business practices, adopting at a minimum, the same principles outlined in GrafTech's Code of Conduct and Ethics for Suppliers and Contractors, and this RPP.

- **Environmental Stewardship**

We are committed to operating in a manner that minimizes the impact on our surrounding communities and local environments. In addition to our goal of reducing the footprint in our own manufacturing operations, we aim to reduce the impact in our value chain, and we encourage our suppliers to identify opportunities to reduce environmental impacts within their supply chain.

We seek to work with suppliers that are committed to the same objectives and follow best practices in environmental management, including compliance with regulatory obligations, energy and resource efficiency, biodiversity management, reduction in greenhouse gas and air emissions and waste reduction and recycling.

We request our suppliers to maintain effective policies, procedures, and processes to manage their environmental impact, maintain compliance with regulatory obligations and to operate their business in a manner that meets the standards of this RPP.

- **Communication on Material Events**

In the event of any significant violations of human rights or ethics and/or environmental hazards (including pollution, floods, etc.), we expect our suppliers to notify us promptly, to work in coordination with local communities to minimize the impacts and provide us with reassurance regarding the possible impact on our ability to comply with our commitments.

5. Documentation and Monitoring

This RPP is an integral part of our supplier relationship management and evaluation process. Monitoring may take the form of surveys, questionnaires, site visits, and follow up on remediation plans. We may request suppliers to:

- Complete the electronic self-assessment questionnaire based on this RPP.
- Provide us or our representatives with copies of all relevant information and cooperation, and to use reasonable endeavors to ensure that their contractors and sub-contractors do the same.
- Demonstrate what efforts they are making to meet the requirements of this RPP.

We intend to support our suppliers in addressing gaps identified. We reserve the right to re-evaluate our relationship with suppliers that do not meet the requirements of this RPP or who are not willing to or cannot provide or commit to an improvement plan.

6. Program Review

This RPP and our implementation of it shall be periodically reviewed to ensure it is current, that the required elements are being met and that it is effective in meeting our operational needs.

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