

GRAFTECH INTERNATIONAL LTD.

# HUMAN RIGHTS POLICY

GrafTech International Ltd. (collectively with its subsidiaries, “GrafTech”) is committed to conducting business in a responsible manner by respecting and protecting human rights. GrafTech expects all of its customers, suppliers, contractors, and other vendors (“business partners”) to abide by the same principles. This policy outlines GrafTech’s expectations regarding adherence to applicable laws and fundamental principles that promote and protect the rights and freedoms of all people.

## PURPOSE

GrafTech considers the respect of human rights to be a fundamental corporate responsibility. This policy articulates GrafTech’s commitment to the promotion and integration of human rights considerations in all aspects of its business, including its procurement, decision-making, management, and operations. GrafTech expects that all employees and business partners comply with the requirements of this policy. No violation of human rights will be tolerated by or within GrafTech.

GrafTech shares this policy and outlines our expectations on adhering to these principles with external stakeholders. Human rights expectations are also reflected in other GrafTech policies, including the:

- [Code of Conduct and Ethics](#)
- [Code of Conduct and Ethics for Suppliers and Contractors](#)
- [Responsible Purchasing Policy](#)
- [Worldwide Health, Safety and Environmental Protection Policy](#)

## COMMITMENTS AND PRINCIPLES

### Health & Safety

Health and safety in the workplace are paramount at GrafTech. GrafTech is committed to providing a safe and secure work environment for its employees and contractors who perform services on our sites. GrafTech works to protect its employees from occupational injuries and illness, and to promote their overall health and well-being.

### Child Labor

At GrafTech, child labor is strictly prohibited. GrafTech will strictly observe the local labor laws of each country where it operates, including the legal employment age. As reflected in GrafTech’s Code of Conduct and Ethics for Suppliers and Contractors, we expect the hiring practices of our suppliers and contractors to be in compliance with applicable child labor laws.

### Forced or Compulsory Labor

GrafTech does not support and will not use forced or compulsory labor at any of its operations. GrafTech’s business partners shall not use forced or compulsory labor.

### Freedom of Association

GrafTech recognizes, and expects its business partners to recognize, the principle of freedom of association and the right to collective bargaining as they exist under relevant laws in the applicable jurisdictions. Employees will not be subject to harassment, intimidation, or retaliation in their efforts to freely associate or collectively bargain.

### Respect and Dignity

GrafTech is committed to treating its employees ethically, respectfully, and with dignity. GrafTech strives to provide a work environment that is not hostile or offensive and that is free from illegal discrimination or intimidation or harassment of any person for any reason. GrafTech sets working hours, wages, and overtime pay in compliance with all applicable laws. GrafTech employees and contractors shall be paid at least the minimum legal wage or a wage that meets local industry standards.

### **Equal Employment Opportunity and Diversity**

GrafTech believes that the diversity of its employees is a tremendous asset, and it will endeavor to provide challenging, meaningful, and rewarding opportunities for personal and professional growth to all employees without regard to race, religion, color, gender, national origin, age, sexual orientation, physical or mental disability, veteran status, or other legally-protected status.

### **Interaction with Our Local Communities**

GrafTech is committed to acting as responsible stewards in its local communities. GrafTech strives to respect the human rights of all members of our local communities, particularly historically under-represented groups, such as women and children, as well as racial, national, or ethnic minorities. GrafTech endeavors to have discussions and dialogues with its community stakeholders to maintain open, transparent relationships.

### **DUE DILIGENCE**

GrafTech strives to identify and mitigate negative impacts on human rights. GrafTech's due diligence activities include the following:

- Encouraging GrafTech's strategic suppliers to complete an environmental, social, and governance self-assessment, which provides an overview of their sustainable business practices, benchmarked against their sector and region.
- Embedding GrafTech's values and expectations into GrafTech's policies and business processes.
- Identifying and assessing potential adverse impacts in operations, supply chains, and business relationships through monitoring of GrafTech's strategic business partners.
- Training GrafTech's employees and raising their awareness about human rights.

### **REPORTING A HUMAN RIGHTS VIOLATION**

All of GrafTech's employees, directors, officers, and business partners play an important role in maintaining its culture of ethics and integrity, and GrafTech encourages them to raise concerns or report violations. Employees have the ability to raise concerns or report a violation through several means, including reporting to supervisors or managers, the human resources department, the legal department, or through the Ethics Line, which can be accessed by phone or through an online platform.

The Ethics Line is operated by an independent third party, is available 24/7, and provides the option to report complaints anonymously to the extent permitted by local law. It is GrafTech's policy that no employee or representative shall be retaliated against for submitting or reporting a complaint and/or cooperating in any investigation relating to an actual or potential violation of GrafTech policy or procedure, provided such individual is acting in good faith. GrafTech takes all reports and concerns seriously and investigates reported ethics violations to determine appropriate follow-up corrective actions, as needed.

The GrafTech Code of Conduct and Ethics may be consulted for more information.

### **PROGRAM REVIEW**

GrafTech is continuing to evaluate opportunities to improve its policies and programs related to respecting and protecting human rights. This policy and its implementation shall be periodically reviewed to ensure it is current, that the required elements are being met, and that it is effective in meeting our goals and commitments.