

SinterCast Code of Conduct

Leadership

SinterCast enjoys global brand recognition and respect as the CGI technology leader and is welcomed by the industry as a reliable and trustworthy partner. To secure and enhance this respect in the industry and in society, the Board of Directors and the management have established this Code of Conduct to guide the way that we represent our company. SinterCast is committed to high and consistent standards of integrity and ethics. We expect our suppliers to act in the same way. The Board and the management are committed to leading by example and to ensuring that these guidelines are honoured throughout our business activities.

Strategy

SinterCast will focus primarily on providing process control technology and know-how for the reliable high volume production of Compacted Graphite Iron. SinterCast will promote CGI within the foundry and end-user communities to increase the overall market opportunity for CGI and to define the forefront of CGI development, production and application. This focus and these efforts will secure the SinterCast global leadership in the field of CGI, while reducing waste in the foundry and reducing carbon emissions on the road. SinterCast will also build upon its technical expertise in thermal analysis and cast iron process control to develop and launch new technologies beyond the core CGI market, such as the Tracking Technologies. These focused activities will provide the foundation for increasing the long-term value of the company for its stakeholders. As a technology lead company, SinterCast will grow and prosper by earning the respect of its customers, its suppliers, its neighbours and its shareholders.

Global Presence

With successful production at foundries located in Europe, Asia and the Americas, SinterCast has established a global organisation with employees and offices in Sweden, the United Kingdom, the United States, China, Korea and Mexico. This global presence naturally results in interactions with a variety of customers, suppliers and other collaborators, as well as a wide range of national customs, rules and regulations. We shall respect these differences while at all times honouring national and international law. The SinterCast Code of Conduct establishes a common guideline for how SinterCast and its partners shall interact in these diverse situations.

Integrity and Ethics

Integrity begins with leadership. SinterCast is committed to integrity and high standards of transparency, confidentiality and ethics. SinterCast is prepared to walk away from non-compliant business opportunities and activities. SinterCast is committed to growing its business while respecting the rules. Integrity and ethics encompass every aspect of our business and we therefore ask all Board members, employees and suppliers to accept and sign this Code of Conduct. Management commits to upholding the Code of Conduct throughout the SinterCast business activities and to openly discussing and monitoring integrity and ethics. Any concerns can be addressed to: ethics@sintercast.com

Personal Integrity, Diversity and Respect

With 32 full time colleagues representing 14 nationalities, SinterCast is an inclusive employer. We welcome the contribution of every employee and every business partner regardless of race, colour, gender, sexual orientation, religion, origin or age. We reject all forms of harassment. We reject abusive practices and we reject discrimination. The core of every successful team is respect. At SinterCast, we respect, encourage and support each other.

Corruption – Zero Tolerance

Offering and granting advantages: SinterCast will compete fairly for business based on the quality and the price of its products and services. Likewise, SinterCast will award business based on the quality, price and service. We will not offer or accept improper benefits. Accordingly, no employee may directly or indirectly offer, promise, grant or authorise the giving of money or anything else of value to a government official, business partner or customer to influence a decision. Any offer, promise, grant or gift must comply with applicable laws and must not raise an appearance of bad faith or deceit. This means that no such offer, promise, grant or gift may be made if it could reasonably be construed as a bribe or an attempt to improperly influence a government official, business partner or customer to grant SinterCast a business advantage.

Demanding or Accepting Advantages: Employees are not permitted to use their jobs to solicit, demand, accept, obtain or be promised advantages. This does not apply to occasional gifts of symbolic value, or meals or entertainment of reasonable value that are consistent with local customs and practices and those of the parent company. Any gifts or entertainment that could be regarded as excessive, or that the employee feels could be leveraged in exchange for future preferential treatment, must be refused.

Anti-money Laundering: SinterCast will conduct business with reputable customers, suppliers and business partners who are involved in lawful business activities and whose funds are derived from legitimate sources. SinterCast will not facilitate money laundering. Employees should highlight suspicious forms of payment or other transactions that could involve money laundering by customers, suppliers or business partners.

Trade Controls: SinterCast will comply with applicable export controls and customs laws and regulations in the countries where it does business. Export controls apply to the transfer of goods, services, hardware, software or technology across national borders. Violations of these laws and regulations may lead to serious penalties, including fines and governmental withdrawal of import and export privileges. Employees and suppliers involved in the import and export of goods, services, software or technology must follow applicable economic sanctions, export controls, import regulations and any related policies and procedures.

Avoiding Conflicts of Interest: It is the duty of every SinterCast employee to make business decisions solely in the best interest of SinterCast, with no regard for their own personal interests. Employees must inform their supervisor of any personal interest that could possibly interfere with the execution of their professional duties.

Anti-Trust: Employees and business partners shall not talk to competitors about the SinterCast technology, prices, quotes, profits, profit margins, costs, methods of distribution or any other parameter that is related to the competitive position of SinterCast. SinterCast will also not enter into any agreement with potential competitors to not compete for an order or to submit uncompetitive offers or to divide up customers or production programmes. SinterCast and its business partners shall not endeavour to obtain competitive intelligence by using industrial espionage, bribery or theft. SinterCast will not knowingly communicate false information about a competitor or its products or services.

May 2023

..... Robert Dover Chairman Steve Dawson President & CEO
Accepted and signed:	
..... Name Date
..... Signature	