



**CODE OF CONDUCT**

**REVISION:** 00      **PAGE:** 1 of 8

**SUBJECT / TITLE:** Kennametal India Limited (KIL) Code of Conduct

This page is a record of all revisions.			For convenience, the nature of the revision is / shall be briefly noted, under the remarks column here below. Unless otherwise stated, any revision/s should be implemented effective the date the Board of Directors of KIL approve this policy.
REV.	BY	PAGES	REMARKS
00	Mr. Naveen C	1 - 8	Original Release
REV.	ISSUED BY	APPROVED BY	APPROVAL DATE
00	Mr. Naveen Chandra	Board of Directors of KIL	May 31, 2023



## KENNAMETAL INDIA LIMITED

### CODE OF CONDUCT

#### **Objective:**

At Kennametal India Limited (“KIL” or the “Company”), winning with ethics and integrity is at the core of everything we do. The actions and decisions of each KIL team member and business partner directly support this shared objective. Our core values and commitment to excellence define who we are and guide us into the future.

We all understand that making the right decisions and taking the right actions are essential to KIL’s success, but there are times when the best approach to a situation is not as clear:

- There may be ethical dilemmas or complicating factors that require us to seek additional guidance;
- There may be risks we don’t fully understand; and
- There may be laws or practices in the locations where we work that conflict with KIL’s core values.

Our Code of Conduct (“Code”) is a reference guide a place to go to seek clarity on the shared values and fundamental principles that define how KIL operates globally.

While the Code cannot possibly explain every law we must follow or answer every ethical question we may encounter, it does reflect KIL’s expectations of ethical conduct globally and provides a framework for making good decisions, so we can have confidence that following the Code will enable us to win with integrity.

#### **Applicability:**

The Code applies to all employees, officers, and directors of KIL. We also expect our business partners, including suppliers, vendors, agents, distributors, and contractors to conduct themselves in accordance with the requirements of our Code. KIL suppliers are expected to know and follow the guidelines in our Principles of Supplier Conduct and hold their suppliers and sub-contractors to the same high standards.

#### **Uses of Code:**

Treat the Code as a trusted resource when you have questions or need guidance. The Code provides a framework for making good decisions and includes examples of how to handle potential ethical dilemmas. When in doubt, contact the resources referenced in the Code to determine the best course of action. We want every team member to make the right choices to support Kennametal’s success and reputation.

## **Violation of Code:**

At KIL, we win when we work together. This applies not only to how we make and sell our products, but just as importantly how we conduct ourselves in the workplace and the marketplace. We take violations of our Code very seriously and individuals who fail to comply with this Code will be held accountable and can face disciplinary action, up to and including termination of employment.

## **Speaking UP**

Winning in the workplace and the marketplace depends in large part on our reputation as a strong partner and an ethical company. We need all Kennametal team members and business partners to work together to sustain a reputation for integrity in our words and actions. We do this not only by making good decisions about our own conduct, but by having the courage to speak up if we have questions about the right choice or to raise concerns about potential misconduct.

## **How do one make a report?**

Kennametal depends on and empowers you to make a report if you become aware of a violation of the law, Company policy, or this Code. We understand that asking questions or reporting concerns is necessary, but is not always comfortable, so we've provided a variety of resources for you to contact.

## **What happens when one make a report?**

We have a professional, objective and confidential process in place to evaluate and respond to all Helpline reports and ethics questions. If you raise a concern, Kennametal will take it seriously and will investigate it promptly and in accordance with local law.

All information associated with a report is maintained confidentially and limited to those persons who are necessary to the investigation and any actions to resolve identified problems. When possible, we will share the results of the investigation with the reporter. If you choose to make an anonymous report through the Helpline you will be provided with a reference number to check back on the status of your report or respond to requests for additional information.

## **Prohibits Retaliation**

We recognize there may be times when you may be reluctant to seek guidance or raise concerns. However, we are firmly committed to not tolerate acts of retaliation against anyone who makes a good faith report of known or suspected ethical or legal misconduct. Making a "good faith" report simply means that you have provided all of the information you have and you believe it to be true. You should feel comfortable knowing that you will not get in trouble if you report a suspected violation of this Code in good faith - even if your concerns turn out to be unfounded.

Kennametal has a global policy prohibiting all forms of direct and indirect retaliation against those who report a good faith concern.

The Company will not retaliate against you for making a report, for asking questions about this Code, or for cooperating in an investigation. This means that no one can take disciplinary action against you or mistreat you for seeking guidance or raising a concern. Any person found to have retaliated in this way will be themselves subject to disciplinary action, up to and including termination of employment.

## **Integrity**

### ***We Attract and Retain the Best People:***

We work hard to attract, engage, develop, and retain the best people and provide a great place to work that is inclusive and affords opportunities for continuous learning and development.

### ***We maintain a diverse and inclusive workforce:***

We value the varying backgrounds and perspectives of our people and believe that diversity empowers us to win for our customers and stakeholders. We treat all team members and business partners equitably and fairly whenever making employment related decisions and provide opportunities to individuals based on merit alone. Kennametal prohibits harassment or discrimination based on any protected characteristic.

### ***We treat one another with mutual respect:***

At Kennametal, we value a strong culture of mutual respect and prohibit all types of discrimination, harassment, and bullying. Wherever we operate or conduct business, we treat others with respect and dignity.

### ***We respect the privacy of personal information:***

Our people trust us to protect the personal and private information that they share with us. We comply with all privacy and data protection laws that apply to the information we collect and are extremely careful when collecting, using or storing the personal information of employees and business partners.

### ***We Work Safely, Protect Health, and Safeguard the Environment:***

We know that outstanding environmental, health, and safety (EHS) performance directly contributes to Kennametal's success and is necessary to achieve our fullest growth potential. We make EHS a core part of our business by incorporating safety practices, social responsibility, and environmental excellence into our daily operations and decision-making processes.

### ***We foster a safe and substance abuse free workplace:***

We all share the responsibility to maintain a safe, healthy and substance abuse free workplace and to prevent all workplace injuries and environmental incidents worldwide. This starts with complying with all global laws and regulations that apply to us. But it also means always being smart about safety - from how we take care of ourselves, to how we look out for the well-being of others - safety is a team effort.

### ***We take care of our environment and support our communities***

Together, we strive to conduct our business and create and sell our products in ways that do not harm the environment, consistent with Kennametal's Environmental, Health and Safety Policy Statement. We comply with all applicable environmental laws. We provide our employees and the public with information on how to handle and use our products safely as well as information on appropriate end-of-life management, including recycling. We ensure all environmental controls and permits are in place and working properly. We support our surrounding communities not only through smart and sound EHS practices, but also through volunteer projects and charitable giving.

### ***We Win with Integrity and Innovation***

We always win business with integrity, solely on the basis of the merits of our work, quality of our products, and commitment to commercial excellence. We act ethically, follow the rules that govern our business, and never compromise our reputation by seeking unfair advantages.

### ***We compete fairly***

At Kennametal, we aggressively distinguish ourselves from our competition honestly and fairly, based on the strength of our products and services. Around the world, there are many laws that promote free and fair competition and regulate the way we interact with our competitors. These laws are complex, and vary from country to country, and the consequences of violating these laws are severe. We comply with Kennametal's **Competition Law Compliance Procedure** and all global competition laws and avoid even the appearance of wrongdoing.

### ***We don't bribe***

At Kennametal, we don't bribe or engage in corrupt activities. This means we never offer or accept anything of value in order to influence a business decision or gain an unfair advantage. This is true whether we are working in a private commercial business setting or with government officials—and it applies anywhere we do business worldwide.

There are many laws that prohibit bribery and corruption in business transactions around the world. These laws and Company policy strictly prohibit any Kennametal employee or third-party working on our behalf, including agents, distributors, or vendors from offering or accepting bribes or kick-backs in any form. The penalties for bribery can be severe for our Company and the individuals involved, including prison terms and significant fines and penalties. In all of our business dealings at Kennametal, we will comply with all applicable anti-bribery and anti-corruption laws and work diligently to ensure that we compete and make decisions ethically and in accordance with the law.

### ***We use good judgment when exchanging gifts and entertainment***

Gifts, hospitality, and entertainment can be useful tools for building goodwill and recognizing joint accomplishments. At Kennametal, we only exchange gifts and entertainment when we are sure that doing so will not compromise our ability to make impartial business decisions and we comply with law and Company policy. It is important to always consider the circumstances, value, and appearance of any planned gift and entertainment. Refer to Kennametal's Global Business Gifts and Entertainment Policy for more information.

### ***We recognize and disclose conflicts of interest***

We are all responsible for making decisions and taking actions that promote the Company's best interests. A conflict of interest occurs when your personal, financial, or family interests or relationships interfere, or appear to interfere, with your ability to be objective and act in the best interest of Kennametal. Conflicts of interest can significantly harm yours and the Company's reputation and in some situations may be against the law.

To protect our Company and promote transparency with our customers, business partners, and shareholders, we must always avoid conflicts of interest, and disclose anything that could be or appear to be a conflict. Conflicts of interest must be disclosed and managed in accordance with Kennametal's **Global Conflicts of Interest Policy**.

### ***We comply with all export, import and trade control laws***

As an international business, our transactions often involve moving products, technology, and services across national borders. Our global trade activity is heavily regulated, and many governments set laws and regulations to control importing, exporting, and related activities. We must be familiar with these laws and regulations that apply to our business activities and remember that they can be complex and are constantly changing. All activities must be conducted in compliance with **Kennametal's Export and Trade Compliance Policy**. Violations of global trade laws and regulations can result in severe civil and criminal penalties for employees and the Company, including losing our ability to export goods to our customers and to Kennametal locations around the world.

### ***We participate in the political process fairly and in compliance with all laws and regulations***

At Kennametal, we comply with all laws that regulate corporate political activity. We also value individual participation in the political process and encourage this as a matter of personal choice. In order to comply with the complex laws that regulate corporate political activity, contact the Office of the General Counsel or Corporate Relations for guidance prior to making or promising any contributions on-behalf of Kennametal.

### ***We don't trade or tip on Inside Information***

While working at Kennametal, you may learn information about the Company, a supplier, customer, or business partner, which has the potential to affect its stock price. If this information is unknown to the public, it is considered inside information. Buying or selling stock while you have this information, and before it is available to the public, is illegal and against Company policy. At Kennametal, we comply with all laws prohibiting insider trading.

It is also illegal, and against Kennametal's Insider Trading Policy, to share information or provide a "tip" to another person who may trade on that information in any way.

### ***We demonstrate transparency in our financial reporting***

At Kennametal, we always maintain accurate and complete financial statements and have policies and controls in place to ensure that our financial reporting and disclosures are timely, accurate, and complete.

### ***We protect our Company's assets and information***

All of Kennametal's assets, including financial assets, physical property, and our confidential information, are critical to our success. We must use these assets responsibly and work together to protect them from theft, carelessness, and waste, whether that means protecting access to company building sites, equipment and tools or safeguarding confidential information. We must also protect any customer resources and assets provided to us for use and safekeeping.

### ***We safeguard our Intellectual Property***

Our intellectual property, including our patents, copyrights, trademarks and trade secrets, enables us to provide the products and services that our customers rely on . We must safeguard our intellectual property and show this same level of care and respect to the intellectual property of third parties.

### ***We use our Company's information systems responsibly***

Our Company's information systems are critical to our ability to conduct business effectively and securely. We are all responsible for demonstrating good judgment and following Company policies when using our information systems.

### ***We practice responsible records management***

We maintain our records responsibly, in accordance with the law and Company policy. We also take care to ensure all records are clear, accurate and complete. When in doubt, review Kennametal's **Global Records Management Procedure** or contact the Office of the General Counsel for guidance regarding your records management responsibilities.

### ***We communicate carefully***

Our customers, shareholders and business partners rely on the accuracy, clarity, and truthfulness of the information we share. We take responsibility for creating communications that meet these expectations, including when we use social media. To ensure the consistency of our external communications and to comply with applicable laws and regulations, only certain individuals are authorized to speak publicly on Kennametal's behalf.

### ***We pride ourselves on the quality and safety of our Products***

Our reputation for integrity and the trust of our customers depends on our commitment to strictly comply with customer and contractual specifications. We must ensure that our products always meet required specifications and that we never make unauthorized substitutions or shortcut quality control or product safety review processes. We comply with all product safety and quality laws and regulations.

### ***We follow special rules when the Government is our customer***

As a global company that periodically does business with governments around the world, we are subject to a variety of laws and regulations, including those related to fraud, bribery, conflicts of interest, waste, and unfair treatment. We perform our government work in an honest and ethical manner and expect the same of everyone who works on our behalf, including but not limited to

agents, distributors and subcontractors of Kennametal. The rules on providing products and services directly to the government or through a government contractor are complex and constantly changing, and violations can lead to substantial fines and penalties, as well as the possible suspension or debarment from government contracting. Many governments require our Company to monitor our actions to insure conformity with their laws and regulations and to report where certain violations may have occurred.

### ***Conclusion***

Making the right decisions is how we win at Kennametal. Using this Code as a roadmap will help you every step of the way. Whether you are unsure of how to handle a difficult situation or simply need to know who to contact for more information on a Company policy, our Code is here to guide you.

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