∫ ,√ª ‘√⊢‘∂ƒ±∫

∫ ,√ª ‘√Õ-‘√ª£: KMF-US-OCC-0004

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KENNAMETAL INC. ∫ ,√ª ‘√¢‘ƒ∂æœ∂ç∫ ¢‘ƒ∏∕©ƒ∂
· Δ‘¢‘ƒ∂æœ∂ç∫ ¢‘ƒ∂¦tÃ∓ª ∫ ∏∑Δ¢

Õ»¦ƒÑ® Ñ¢ƒÑ®

º ƒ‘¢‘. : £ç«Ñ∏Ë«∫ ∏Ë¢Ñ∏ª√ª √∏ª£‘£ç®Kennametal Inc. · Δ‘∕Õƒœ ƒÀ∏Ã‘£‘£ç®Kennametal Inc. · Δ‘œ©£ç«Ñ∏Ë¢Ñ¢ƒƒ ÃÑ∏Ë©ƒœ»‘¬Δ”∏®¢‘ƒ•ç ƒ»∑Ã¢Ñ∏Ë ,∫ ∏ª√ª Ã∓∫ ∏®∕ÆÆ ¬∅‘ƒÃ¢œ«Ñ ÃÑ¢∑Ã¥ œ«ª®Ñ•»‘¬Δ”¦ƒœ,¢‘√∫ Kennametal ¦ƒœ∂∑ƒ‘Ã®¢™º‘“· Δ‘œ©,′ ¦ƒœ∂∑ƒ‘Ã®¢Ê¦∫ Ê Ç¬;Ç¦ Ê· ¢©¢√ · Δ‘,′ç ƒ‘,√∫ ©¢∫ ,√ª ‘√ ∏Ë¢Ã®µÕƒœª ‘®Ã¢∫ ∂Δœ¢∫ ¢‘ƒÃÑÃ‘ƒ¦ ÑÕ,µÊ£œ∫ ,√ª ‘√ ∏Ë¢º√®•• Δ∏Ë¢º¢ª¢‘œ∫∕Æ∂,µÊ Ã®∫ Δ£Ã∓∏Ë¢Ã®µ	
Ç ç ƒœ∫’∏Ë¢‘ƒ· ¢%‰∏Ã®µ£œ∫ ,√ª ‘√	¦ƒœ»‘¬Ã‘µ»¢ ©¬∅‘ƒª ª∅‘Δ¢À¥ £œ®¢‘ƒ· ¢%‰º¢Ã Ê ,∂Ã®‘√¦Ã®∂ ,º ƒµ∂ƒ»©Ãª∫ ,√ª ‘√∏Ë¢ª ¬‘¦ƒœ,Ã®ç∫ å©»£¦ç,©¢‘ƒ¦ª Δ¦∫ · º Δ® Ã®∫ ¦ƒÊ¢÷ Ã®ƒœ¢‘ƒΔª ∏Ë¢Ã®»£œ®∏Ë¢Ã®µœ«®Ã ª ƒ¥ê¦ç∫ · ∂å ©‘ƒª º%¢∫ Ãœ«®œƒ•»ƒµ¦∫ ∫ ¬¢‘ƒ· ¢%‰∫ ¦ƒœ¢º	

¢‘ƒ· ¢%‰	,µ√	Ç ç	Ã‘√¦Ã∂
00	DWG	1-10	¢‘ƒ∂÷øœ∂ç™
01	PJW	1-11	¢‘ƒ· ¢%‰
02	SAR	1-11	∂ƒ»Ãœª · Δ‘œ®¦µ∂; · ¢%‰¢ƒª »∫ ¢‘ƒ∂ƒ»Ãœª »¦ƒ“Ã∑∫ “£œ®•• Δ¡ ‘√ œ¢ ¢‘ƒ· ¢%‰© · ∏∫ ∏Ë™ ¢‰∫ Ç ç
03	MB	1-12	¢‘ƒ· ¢%‰ ƒ»∑Ã®‘ À‘∂æœ∂ç∫ ¢‘ƒ¿œ¢¦∫: ∏Ë¢Ñƒ∕À∏Ë¢ ¦µ∂%¢ œƒ∕Æ®œ¢‘ƒ· ¢%‰© · ∏∫ ∏Ë™ ¢‰∫ Ç ç

¢‘ƒ· ¢%‰	œ¢,µ√	œ∫∕∂;µ√	»∫’∏Ë¢∕∂÷
00	Roxanne Turner	David W. Greenfield	08/01/2007
01	Paul J. Ward	Kevin G. Nowe	11/01/2013
02	Seth A. Rice	Michelle R. Keating	8/13/2017
03	Magnolia I. Bernhard	Michelle R. Keating	5/9/2023

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Õ»ƒÕ® Ñ¢ƒÕ® · Δ‘¢‘ƒ∂æ∂ç∫ ¢‘ƒ∂¡µÃ∫ª ∫ ∏Ë∑Δ¢£∞®KENNAMETAL INC.

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Õ¬Ÿà√–∫∫‚√ª ‘√: KMI-US-OGC-0004

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Õπÿ¡—µ‘‚¥¬: ·π«∑“ß¥â“π®√‘¬∏√√¡∑“ß∏ÿ√°‘® KENNAMETAL INC.

∫‚√ª ‘√«à“¥â«¬¢ âÕ°”Àπ¥·π«∑“ß¥â“π®√‘¬∏√√¡∑“ß∏ÿ√°‘®

I. ¢Õ∫‡¢µ·≈–«—µ∂ÿª√– ß§å

∫‚√ª ‘√«à“¥â«¬¢ âÕ°”Àπ¥·π«∑“ß¥â“π®√‘¬∏√√¡∑“ß∏ÿ√°‘® (∫‚√ª ‘√) ... Kennametal Inc. ... ("Kennametal") ... Kennametal ...

∫‚√ª ‘√ ... Kennametal ... Kennametal https://www.kennametal.com/en/about-us/ethics-and-compliance.html À√◊Õ https://secure.ethicspoint.com/domain/media/en/gui/48375/index.html

∫‚√ª ‘√ ...

... ∫‚√ª ‘√·π«∑“ß¥â“π®√‘¬∏√√¡ ... The Hub ...

II. §”®”°—¥§«“¡

...

... 2010 ...

·∫∫øÕ√å¡: KMI0002F01 R02 (12/2008)

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[illegible]

[illegible] · [illegible] KENNAMETAL INC.

III. [illegible]

Kennametal [illegible] ,µ [illegible] Kennametal [illegible] · [illegible] Kennametal [illegible] Kennametal [illegible] [illegible] · [illegible] Kennametal [illegible] [illegible]

[illegible]

[illegible] Kennametal [illegible] %[illegible] Kennametal [illegible]

Kennametal [illegible] · [illegible] [illegible] ("[illegible]") [illegible] Kennametal [illegible] %[illegible] [illegible] 1977 ("FCPA") [illegible] Kennametal [illegible] ("[illegible]") [illegible] · [illegible] Kennametal [illegible] [illegible] 2010 ("[illegible]")

[illegible]

IV. [illegible]

[illegible]:

1. [illegible]: [illegible] Kennametal [illegible]

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[illegible]

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[illegible]

[illegible] · [illegible] KENNAMETAL INC.

[illegible]

[illegible] [illegible] Kennametal [illegible] The Hub

2. [illegible]:

[illegible] Kennametal [illegible] Kennametal

[illegible]. [illegible]:

1. [illegible] 525 William Penn Place, Suite 3300, Pittsburgh, PA U.S.A 15219; +1 (412) 248-8309 [illegible] +1 (412) 248-8275; k-corp.ethics@kennametal.com

2. [illegible] Kennametal ([illegible]) https://kennametal.ethicspoint.com [illegible] Kennametal (https://www.kennametal.com/en/about-us/ethics-and-compliance.html)

V. [illegible]

[illegible]. [illegible]

1. [illegible] (Kennametal [illegible])

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· Δ‘¢‘ƒ∂æ∂ç∫ ¢‘ƒ∂µÄ∫ª∫ ∏Ë,Δ¢£o®KENNAMETAL INC.

Õç¬,Õ¢£o®»ÆΔ‘¢‘ƒ¡Ë®ª ƒo®∏®Õ µ∏Ë®»£o®ª ¡Ò,Õ¢ç∏Ë®±Õƒ®ÑÕ∫ å√®∫ £o®±%æ©‘ ◊Æ•å¡∏µ¢Ä¬ ¡∫¢∫ · ∂æ‘%µª ¢∫∕∂¡ÄΔ‘√¢À¥¢¡À∕∆®Ò∫ç©¢Ä∫ ª®∫ ∏Ë∕ÿÀ‘∏Ë%

¢©¢ƒƒ∂¢®Õ¢¬ ¡ ‘√,∂∫ç,√ª ‘√ È∆®æ%∫ È

(i) ¢‘ƒ∂∏∏Δ∂æ¢‘ƒ¢ƒ∏ÌÕƒ®‘ƒ∂µÄ∫,,©¡µ Ê
£o®••ΔÕƒ®¢Δª••Δ¡®¢Δ»¢æ®%æÕ¬‘“Ä¬,∫ •»‘¬Ä‘¬‘ƒ∑¢æ®¡Ä∏®¢‘ƒ£o®∫ ;

(ii) ¢‘ƒ©®©,,Õ¢••ΔÕƒ®¢Δª••Δ¡®¢Δ»∏ÌÕƒ®¢Δ‘»∫¢‘ƒ¢ƒ∏Ì¡µ Ê
o∫’‡Ä¢‘ƒæ∂æÿÕ∫ ∏Ë®´ ª µ¢√¢ÕÕ¬‘√£o®••ΔÕƒ®¢Δª••Δ∫ È,µ√÷ª Õƒ®¢

(iii) ¢‘ƒ ”©®••ΔÕƒ®¢Δ¡µ®¢Δ»,,Õ¢´ o∏∆æ∆ª ƒª ‘ΔÕƒ®¢•¢ƒo¢æ®%æÕ¬‘“Ä¬‡ÑÑÑÕΩ¢ƒ∏Õƒ®¢o∏∆æ∆¢
‘ƒ¢ƒ∏ÌÕƒ®¢‘ƒ∂µÄ∫,,©£o®±ª ‘ΔÕƒ®¢•¢ƒ¡®¢Δ»

2. ƒ‘µª•»‘¬ƒ®Ë∏Ë∏Ä¡µ¢∫ ¢‘ƒΔ‘“‡µ¢ÕÕ¬‘√
%æ¢‘ƒ¢ÌÕ∫ µ•»‘¬ƒ®Ë∏Ë∏©®®¢»ª ¢‘ƒΔ‘“‡µ∂æ¢‘ƒΔ‘“‡µ¢ÕÕ¬‘√∂æ∂ç∫ ¢‘ƒ∏∕∂∏Ë,Δ¢
Õ¢ª••Δ∏∏ª Õƒ®¢∏Ò∆Ω∏Ë®∏∏ª »æ¢‘ƒ¢ƒ∏ÌÕ®¢µ¢ÕÕ¬‘√◊∫ »,∫ ¢∏Ë®‡µ¢ÕÕƒ®¢ƒ∫ ∑∑»‘¬ª‡Ä%%µ¢®Ë®◊¢‘ƒ∏∕∂,µ√ª••
Δ¡ ‘√ ¢ª ¢©◊¢‘ƒΔ‘“‡µ¢ÕÕ¬‘√¢‘ƒ∂æ∂ç∫ ¢‘ƒ∏∕∂∏Ë,Δ¢Õ∫ ®®¢£Ë%‰ ¢‘ƒÕ∆¢‡ÑÑ®¢‘ƒ®Ë∫Ä,µ√ª◊∂ƒ®¢‘ƒ®,©µ∂
Õƒ®¢‘ƒ¡¢¢‡™∂æ»‘¬ƒ®Ë®Δ»,µ√‡∂∫ ‘¢©ÄÑ®Δ,Ë®ƒÀ∏Δª••Δ∫ È∑∑»»ª ª ƒ®Ë∫Ä,∫ ¢‘ƒ¢ƒ∏ÌÕ®¢µ¢ÕÕ¬‘√

3. π®µ®£o®∂©ƒƒ¢‘ƒ∂∏∏Ë®©‹ ∂æ%∫ È‡Ä∆»æ¢®£o®∂©ƒƒ∏Ë®ª ÄÒ® "•»‘¬‡Ä%%µ®®
∏Ë®◊¢‘ƒΔ‘“‡µ¢ÕÕ¬‘√∂æ∂ç∫ ¢‘ƒ∏∕∂∏Ë,Δ¢ · Δ‘∂æ®Ì‡ç∆ÄÑ∫ ª®∫ ∏Ë∕ÿÀ‘∏Ë%∏∏Ë®æ¢Ì· ∫ “∫ Ì¡¢Ë¢÷:

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- '£æ∂¢Δ®‘ƒ,Õç¡º ƒÀ' £o®••Δ¡ ‘√ ¢∏Ë®™ª ‘“•Ìæª ‘√ ƒ¢‘ƒ∏Ë∆‡ƒ®¢
- ∏Ë∕ÿÀª••Δ¡ ‘√ ¢æ®%æ Ä ‘√®∫ πƒ¢∏Ë®¢∂æ®¢Ä ‘√®∫ ∏Ë®µª ¢‘ƒ»æ∆®
- ª••Δ¡ ‘√ ¢‡Ä»£o®ª Õƒ®¢Ä”ø∫’πê¢Δ¡‡ª ‡Ò∆Ò ç∏Ë®±

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[illegible] KENNAMETAL INC.

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£. [illegible]

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Kennametal [illegible] Kennametal ([illegible] The Hub) [illegible] Kennametal [illegible]

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[illegible] Kennametal [illegible]

VI. [illegible]

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[illegible] KENNAMETAL INC.

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VII. [illegible]

Kennametal [illegible] Kennametal [illegible]

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[illegible] Kennametal [illegible] ("OEC") [illegible]

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[illegible] · [illegible] KENNAMETAL INC.

©[illegible] Kennametal [illegible] Ê OEC · [illegible] Kennametal [illegible]

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[illegible] OEC [illegible] Kennametal [illegible]

VIII. [illegible]

[illegible] Kennametal

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Õ¬‘√⁄¥£∫ ,√ª ‘√: KMT-US-OCC-0004

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Õ»⁄ƒÑ® Ñ¢⁄ÑÑ® · Δ“¢‘ƒ∂æ∂ç∫ ¢‘ƒ∂¡µÃ⁄ª∫ ∫ ∏Ë¢Δ¢£œ®KENNAMETAL INC.

ª ∏Δ®∏À∏ÃÑ•ª∆ÃÕƒª∏® ƒÀª∏Δ“ª•Δœ©¢,ÃΩΔ¬‘©¢¢‘ƒΔ“‡¡¢ÕÕ¬‘√∂æ∂ç∫ ¢‘ƒ∏⁄∂∂∏Ë¢Δ¢ ∂»œ∂æ®œ®∏Δ®∏À∏Ë¢Δ%%%¢‘√,∂ø‘ƒ‘ª ª∆Ë®»∂æ¢‘ƒ¢‘ƒ∏œ¢»,∫ ∂æ®ƒ“‡∏.. (FCPA)
· Δ“øƒ“ƒª ª∆Ë®¢‘ƒ∂¡µÃ⁄ª∫ £œ®ÃÕƒª œ¥‘©¢ƒ (UK Bribery Act) ¬µ®∂æ%∫ È

ø.ƒª.»∂æ¢‘ƒ¢‘ƒ∏œ¢»,∫ ∂æ®ƒ“‡∏.(FCPA)

ª ƒÀª∏

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- ¢‘ƒ∂¡µÃ⁄ª∏©¢¢‘ƒ£¢ƒ»¬,∫ ÃªÈ£œ¥±‘Δ
- ¢‘ƒ‡ÃÃ⁄ª∏¢‘ƒÃ®œ¢
- ¢‘ƒ·∂æ®Ë¢ƒ»©Ãœª¢‘ƒº ª∂æ¬œÃƒ‘
- £œ¢ÌÕ∫µµ∫¢‘ƒª ª∆Ë◊º ª ÃÊ®µ$2.5Δ¢∫ ∂æ¢‘ƒΔ“‡¡¢Õ∫ÿ®ƒ®

ª⁄••Δπƒƒ¬µ‘

- º ƒª ÃÊ®µ US$100,000 ∂æ¢‘ƒΔ“‡¡¢Õ∫ÿ®ƒ®
- Ù•¢ÃÊ®µ 5º∂æ¢‘ƒΔ“‡¡¢Õ∫ÿ®ƒ®
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ø.ƒª.¢‘ƒ∂¡µÃ⁄ª∫ £œ®ÃÕƒª œ¥‘©¢ƒ (UK Bribery Act)

ª ƒÀª∏

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IX. ¢‘ƒœ¢®œ⁄∫ ,√ª ‘√£œ® ƒÀª∏

¡¢ÃΔ‘ƒ∂æ%∫ È,ÕÕÃÕƒª ø∫ ¢®∫ ∏⁄¢•∫ ,∫ Ã⁄∫ ∫ ,√ª ‘√Δ“¢‘ƒª »∫ ¢‘ƒ∏®¢ÕÕ¬‘√Δ“©⁄√πƒƒ£œ®Ã®¢ÊÕÃÊ®œÃÕ∏®¢ƒ¢©£œ®The Hub:

- ©ƒƒ√ª ƒ¥
- ∫ ,√ª ‘√£œ®»ª ª∆Δ“¢‘ƒ‡⁄ª ª ƒÀª∏ƒª ƒ¢©∏Ë¢Δ¢
- ∫ ,√ª ‘√¢‘ƒ©¢‘ƒ¢‘ƒª ª∫ ∏Ë¢Δ¢
- ∫ ,√ª ‘√£œ®¢¡µ∫¢‘ƒ%∂æ∂ç∂œª Δ“¢‘ƒƒ‘√®∫
- ∫ ,√ª ‘√µ∫ ΩΔº ƒ‘,√∫ ∏ª¨ œ∫

∫ ,√ª ‘√™ª¢‘ƒ∏œ¢‘ƒ¢ª ª∆Ë®¢‘ƒ•»ª •⁄
Ã⁄‘¡¢Ã‘ƒ™ª¬œ∫ª ª∆Ë®ÃÕƒª¢‘ƒœ¢®∫ È

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[illegible] KENNAMETAL INC.

[illegible] Hub

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[illegible]

[illegible] Kennametal [illegible]

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[illegible]: KMT0002F01 R02 (12/2008)

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[illegible]: KMI-US-OGC-0004

[illegible] 03 [illegible]: 13 [illegible] 11

[illegible]

[illegible] KENNAMETAL INC.

(OEC) [illegible] OEC [illegible]

[illegible]:

- [illegible]
- [illegible]
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- [illegible] Kennametal

[illegible] OEC [illegible] Kennametal [illegible]

- [illegible]
  [illegible] (PEP)
- [illegible]
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