

# PRINCIPLES OF SUPPLIER CONDUCT

#### **OVERVIEW**

Kennametal's commitment to integrity extends to its diverse and worldwide supply base. To ensure that suppliers conduct business with a high degree of integrity and in a responsible manner, all of Kennametal's suppliers must conduct their business in a manner consistent with these Principles. Suppliers should also become familiar with the business practices of their suppliers and sub-contractors and ensure they operate within the Principles outlined herein. Failure to abide by these Principles may result in discontinuance of business relationships with Kennametal. Particular supplier contracts may contain more specific provisions addressing some or all of these issues.

## **KEY EXPECTATIONS**

#### **Conflicts of Interest**

Employees of Kennametal should act in the best interest of the Company, and therefore should have no relationship, financial or otherwise, with any supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of Kennametal. Friendships outside of the course of business are inevitable and acceptable, but suppliers should ensure that any personal relationship does not influence Kennametal employee's business judgment. If a supplier employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law, or same or opposite sex domestic partner) to an employee of Kennametal, or if a supplier has any other relationship with an employee of Kennametal that might represent a conflict of interest, the supplier must disclose this fact to Kennametal or ensure that the supplier employee does so.

#### Gifts, Meals, and Entertainment

Employees of Kennametal are prohibited from accepting anything more than modest or nominal gifts, meals and entertainment from suppliers. Ordinary business meals and small tokens of appreciation such as gift baskets at holiday time generally are fine, but suppliers should avoid offering Kennametal employees travel, frequent meals, or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed.

#### **Business and Financial Records**

Both the supplier and Kennametal must keep accurate records of all matters related to the supplier's business with Kennametal. This includes the proper and accurate recording of all expenses, payments, and timekeeping records, and is particularly critical when a supplier is performing services or supplying goods to Kennametal under a



government contract. Errors or omissions should be promptly brought to the attention of Kennametal for reconciliation.

## **Improper Payments**

Bribery and kickbacks are illegal and subject to criminal penalties in many countries, including the United States. Bribes, kickbacks and similar payments to government officials, Kennametal employees or agents acting on Kennametal's behalf are strictly prohibited. This prohibition also applies in areas where such activity may not violate local law, and suppliers should work against corruption in all its forms, including but not limited to extortion, bribery, and money laundering.

## **Child and Forced Labor**

Kennametal will not engage in or support the use of child labor. Suppliers must comply with applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirement for their location. In the absence of local law, suppliers shall not employ children under the age of 14. Kennametal also does not engage in or support the use of forced or involuntary labor and will not purchase material or services from a supplier utilizing forced or involuntary labor. All suppliers should ensure their practices do not encourage the use of forced, compulsory, or child labor.

## **Complying with Global Trade Requirements**

Kennametal is committed to complying with all applicable global trade laws and regulations, including the proper handling of export-controlled information and products. Suppliers are expected to know, understand, and comply with applicable U.S. and other trade laws and regulations in providing products and services to Kennametal. This includes the proper handling of export-controlled information and materials that are supplied to or on behalf of Kennametal.

## **Customs Trade Partnership Against Terrorism (CTPAT)**

As a Customs Trade Partnership Against Terrorism (CTPAT) partner, Kennametal works closely with Customs and Border Protection (CBP) to protect the supply chain, identify security gaps, and implement specific security measures and best practices. All employees, contractors, service providers and visitors of Kennametal are expected to comply with the CTPAT's Security Criteria, as well as any policies, procedures, and instructions issued by Kennametal. We strongly encourage all our business partners to participate in the CTPAT program and collectively we can provide our customers the safest and most expeditious cross-border supply chain and assist in the worldwide campaign to stop terrorism.

#### Work Conditions, Compensation

Kennametal pays employees a competitive wage. Suppliers must comply with all applicable wage and hour labor laws and regulations governing employee compensation and working hours. Kennametal supports diversity and equal opportunity in employment. Unlawful discrimination in the workplace is not tolerated. Suppliers must comply with all applicable local laws concerning discrimination in hiring and employment practices, and to provide a safe work environment for their employees, while



encouraging the elimination of discrimination in respect of employment and occupation throughout the supply chain. Suppliers should also support and respect the protection of international human rights within their sphere of influence and make sure they are not complicit in human rights abuses.

## **Environment, Health & Safety**

Kennametal respects the environment and the health and safety of its employees and conducts its operations in compliance with applicable laws and regulations. Suppliers are expected to conduct their operations in a way that protects the environment and supports accident prevention and minimizes exposure to health risks, and to comply with all applicable environmental, health and safety laws and regulations in the countries in which they operate. Suppliers should support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and use of environmentally friendly technologies.

## **Confidential Information**

Kennametal is dedicated to complying with applicable laws concerning proprietary, confidential, and personal information. Suppliers must comply with all applicable laws and regulations governing the protection, use and disclosure of Kennametal's proprietary, confidential and personal information; and to respect the proprietary, confidential and personal information of its customers, where such information is provided to the supplier.

## **Responsibly Sourced Materials**

Pursuant to its Conflict Mineral Supply Chain Policy, Kennametal is committed to the responsible sourcing of materials and expects the same commitment from its suppliers. Kennametal requires all suppliers to comply with Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) and the Regulation (EU) 2017/821 of the European Parliament. Suppliers are required to source and supply "conflict free" material originating from the Democratic Republic of Congo and the adjoining countries, and any conflict-affected and high-risk areas ("CAHRAs") in accordance and support of applicable regulations. Suppliers shall flow down the substance of these requirements to their suppliers and sub-contactors, which perform work or provide goods or services. Kennametal explicitly reserves the right to audit such flow down. Furthermore, Kennametal requires all suppliers to certify that no material delivered to Kennametal contains any substance originating from the Democratic Republic of Congo or any adjoining country that would require disclosure by Kennametal under the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, or any rule promulgated thereunder.

Kennametal requires suppliers to provide material that conforms with the internationally recognized OECD Due Diligence Guidance to address risks outlined in Annex II of such Guidance in the Regulation (EU) 2017/821, namely:



- Serious abuses associated with the extraction, transport, or trade of minerals;
- Any forms of torture, cruel, inhuman, and degrading treatment of humans, including, but not limited to:
  - Any form of forced or compulsory labor;
  - Any form of child labor;
  - Other human rights violations and abuses such as widespread sexual violence;
  - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Direct or indirect support to non-state armed groups;
- Direct or indirect support to public or private security forces;
- Bribery, fraudulent misrepresentation of the origin of minerals and money laundering.

Kennametal is committed to sourcing materials and components responsibly and requires its suppliers to adhere to the same values related to human rights, ethical behavior, and environmental responsibility. Kennametal suppliers should work cooperatively to ensure materials supplied support this commitment.

# CONTACT INFORMATION, REPORTING CONCERNS

For questions or comments on these Principles of Supplier Conduct, please contact your Global Sourcing representative or the Vice President of Global Sourcing:

Tom Hudak Vice President, Global Sourcing tom.hudak@kennametal.com

Questions or Concerns can be raised using one of the following confidential options: Telephone: 1-877-781-7319 (Global toll-free, using AT&T Direct Access)

1-724-539-4031 (Caller Paid) 1-724-539-3839 (By Fax) <u>k-corp.ethics@kennametal.com</u>

By Mail: Office of Ethics and Compliance Kennametal Inc. 525 William Penn Place Suite 3300 Pittsburgh, PA 1521