

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 support our leadership position, and our respect within the industry and 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. The Board and the management are committed to leading by example. The Board and the management are committed 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 SinterCast's global leadership in the field of CGI. 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 our Tracking Technologies. These focused activities will provide the foundation for increasing the long-term value of the company for its shareholders. As a technology led company, SinterCast will grow and prosper by earning the respect of its customers.

Global Presence

With successful high volume production in foundries located in Europe, Asia and the Americas, SinterCast has established a global organisation with employees and offices in China, Germany, Korea, Sweden, the United Kingdom and the United States. Our global presence naturally results in interactions with a variety of customers, suppliers and agents, as well as a wide range of national customs, rules and regulations. We shall endeavour to honour these differences. This Code of Conduct establishes a common guideline for how SinterCast shall be represented in these diverse situations.

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. We will not offer improper benefits to others. 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.

Employees must also not give money or anything of value indirectly to a consultant, agent, intermediary, business partner or other third party if it is suspected that all or part of such a gift may be passed on to a government official, business partner or customer in consideration for an unfair advantage in a business transaction. SinterCast will ensure that its consultants and agents understand this Code of Conduct and will apply these ethical requirements in its contracts with such consultants and agents.

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 declined.

Anti-money Laundering: SinterCast will conduct business with reputable customers, consultants 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, consultants 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 involved in the import and export of goods, services, hardware, 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 shall not talk to competitors about 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. We will not seek to obtain competitive intelligence by using industrial espionage, bribery or theft and SinterCast will not communicate knowingly false information about a competitor or its products or services.

January 2021

Jan Åke Jonsson Chairman	Steve Dawson President & CEO
Accepted and signed:	
Name	Date
Signature	