



Supplier Code of Conduct

Purpose

CMC has built a successful, sustainable company over more than a century by conducting business in an ethical and responsible manner, not only with our customers but also with our suppliers, vendors, contractors, consultants, agents and others who provide goods and services to CMC (collectively “Suppliers” and individually a “Supplier”).

CMC firmly believes that all people should be treated fairly and with respect, and that human rights are inherent to all, regardless of race, color, religion, sex, age, physical or mental disability, national origin, citizenship, military or veteran status, sexual orientation, gender identity and/or expression, genetic information or any other status.

This Policy is guided by the core principles of the UN Guiding Principles on Business and Human Rights and reinforces our commitment to honoring all internationally recognized human rights consistent with the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work.

We are committed to ensuring our Suppliers’ business practices are also conducted following these principles and have developed the following Supplier Code of Conduct to outline our expectations. CMC may conduct periodic audits and/or make sourcing decisions based on a Supplier’s willingness to acknowledge and agree to our Supplier Code of Conduct.

Business Ethics

Suppliers are required to conduct all activities with the highest ethical standards and in accordance with United States and international laws, as well as all laws in the applicable countries of business, including but not limited to all applicable anti-bribery laws, including the United States Foreign Corrupt Practices Act, which prohibits companies from bribing public officials when conducting business, including the supply of goods or services to CMC in the United States and abroad.

Labor

Children and Young Workers

Suppliers must not employ children or support the use of child labor. Suppliers must not use prison labor, forcibly indentured labor, bonded labor, slavery or servitude. Suppliers are expected to recognize the rights of their employees to join organizations of their own choosing.

No Discrimination, Harsh or Inhumane Treatment

Suppliers are expected to maintain a professional, safe, and discrimination-free work environment and to ensuring that each employee is treated with fairness and dignity. Suppliers must not tolerate discrimination or harassment of any kind. Suppliers must not subject their employees to any physical, sexual, psychological, or verbal harassment, or abuse or intimidation in any form. Suppliers must prohibit retaliation against anyone who has made a harassment complaint in good faith.

Compensation and Minimum Wage

Suppliers must ensure that compensation meets or exceeds the legal minimums. Suppliers are expected to clearly communicate compensation philosophies to employees and ensure such philosophies are in full compliance with all applicable laws.

Suppliers must comply with all applicable labor and employment laws and regulations, including those regarding work time, work conditions, and appropriate compensation.

Environment, Health & Safety

Suppliers must conduct business in a manner that prevents harm to people and includes strong practices to control the impact of Supplier's product and operations on the environment in areas including, but not limited to, energy use, greenhouse gas emission, water use and waste generation. Suppliers are expected to be committed to continuous improvement towards zero incidents and to be in compliance with all applicable safety, health, and environmental laws and regulations.

Suppliers must follow CMC site specific environmental, health and safety requirements when operating on CMC sites, including CMC's Health & Safety Policy, which can be found here ([link to site](#)).

Conflict Minerals

Consistent with the public policy underlying the Conflict Minerals provision (Section 1502) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act") as well as European Parliament and the Council Regulation (EU) 2017/821 (the "Regulation") (together with the Act, the "Governing Law"), Suppliers must recognize the significant legal and non-legal risks associated with sourcing tin, tantalum, tungsten, and gold (the "Conflict Minerals") from the Democratic Republic of the Congo and adjoining countries. Accordingly, Suppliers must assist CMC in its compliance with the Governing Law by conducting reasonable country of origin inquiries and following internationally accepted due diligence guidelines.

Suppliers must respond in a timely manner to information requests from CMC regarding the uses and sources of Conflict Minerals in its products including information about Conflict Minerals that are recycled or scrap. Suppliers shall take all other measures as are necessary to comply with the Governing Law.

Confidential Information

Suppliers are required to protect CMC's confidential information. "Confidential information" is any type of information that is maintained as confidential by CMC and provides CMC with a business advantage over our competitors that do not know or use this information. This includes inventions, trade secrets, business information, technical information, computer programs, product designs, and manufacturing expertise. Any information about the Company that is readily available to the public is not Confidential Information.

Business and Financial Integrity

CMC's management, shareholders, investors, the general public, and governments rely on the accuracy of our accounting records. It is imperative that Suppliers maintain accounting records and reports in accordance with the laws and regulations in each applicable country. Those records must accurately and fairly reflect all aspects of the Supplier's business dealings with CMC.

"Inside Information" is material non-public information about CMC's financial or business situation. Supplier and Supplier's employees may gain knowledge of such information because of work Supplier is doing for CMC. Information is "material" if a reasonable investor would consider it important in making a decision to buy, hold or sell securities. Supplier and Supplier's employees must adhere to U.S. securities laws and regulations regarding Inside Information, including prohibitions against insider trading.

CMC assets include, but are not limited to, the following: e-mail, computer systems, documents, equipment, facilities, information, logos and business names, materials, and supplies. Suppliers shall not any use of CMC's assets for purposes other than the fulfillment of CMC business and Supplier's responsibilities to CMC. The use of CMC assets for personal financial gain is strictly prohibited.

Photos, Videos and Media

Suppliers and their employees must obtain written permission from CMC prior to taking any photos, videos or other media representation of any CMC facility or operation processes of any CMC facility. Suppliers must obtain written permission from CMC prior to issuing any public statement, press release or marketing materials utilizing CMC's name, logos, trademarks or service marks. Permission may be granted at CMC's sole discretion.