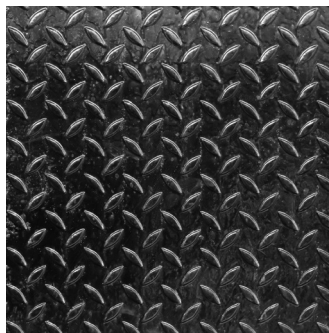




CODE OF CONDUCT.



Issued May 2025



ABOUT BODYCOTE.

Bodycote is a leading global provider of essential materials science solutions. We enable customers to produce better, stronger and more sustainable components through our deep engineering expertise, world class range of metallurgy services and cutting-edge specialist technologies. With over 150 facilities in 22 countries, Bodycote's engineers and metallurgists leverage our global network of expertise, skills and experience to support customers, whatever their market or location.

Our solutions power sustainable global progress through two leading divisional platforms: Specialist Technologies and Precision Heat Treatment. We service a wide range of end markets enabling improved, longer lasting and more efficient products. These include aerospace, defence, automotive, energy, industrial, consumer and medical.



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FOREWORD FROM OUR CEO.



The success of our Group is undoubtedly built on the strength of our people. Together, we are dedicated to conducting business responsibly with integrity and high ethical standards, ensuring positive outcomes for ourselves, our customers, suppliers, shareholders, and the communities in which we live and work."

Jim Fairbairn
Chief Executive Officer

Our Code of Conduct outlines our expectations for how business should be conducted at Bodycote in order to achieve these goals. It defines Bodycote's role as a sustainable business, a respectful employer, and a reliable business partner, while also setting out the core values that direct us. The Code offers clear guidelines to follow when working for, or with, Bodycote; designed to help you navigate situations you may encounter in the course of doing business.

Our Code forms the basis of our compliance policies and procedures, which are all accessible on our intranet. Please read it carefully, make sure you understand it by asking questions where necessary, and refer to it regularly.

Bodycote's Board of Directors and executives have all endorsed the Code and lead its implementation by example.

Thank you for your commitment in striving to meet the high expectations placed on you as a representative of Bodycote.

OUR PURPOSE.

We deliver performance metallurgy that powers sustainable global progress.

THE POWER OF PURPOSE

Our purpose statement is our guiding philosophy, a succinct way of encapsulating the significant contribution we make to the world. It has been designed as an aspirational statement, based on where we are in our development, and intended to create decades of stretch for our people and our company.

Purpose is powerful, particularly when it's shared. It helps to define the Bodycote brand, underpins our quality standards, provides our customers and stakeholders with valuable reassurance of our continuing progressiveness and relevance, and makes us relatable beyond the day-to-day work we do. Our purpose is the foundation for long lasting, trusted relationships with our stakeholders and we can be very proud of it.

OUR VALUES.



SAFETY FIRST

For us, safety is not only a priority, it's a way of life. Our belief in the value of recognising and reducing unnecessary risks, far exceeds the demands of regulation or compliance.

It ensures our people, property, partners and customers always feel protected, able to flourish and operate with confidence.



PERFORMANCE

Products destined for extreme operating environments not only require precision engineering and expertise, but performance thinking and action.

For us, there can be no shortcuts or compromises. The result is unequalled service quality and performance value, because our customers' reputations depend on us, and we depend on them.



CUSTOMER EXPERIENCE

As ingenious solvers of engineering challenges, we focus on building strong customer relationships and close collaborations that unleash remarkable outcomes.

These actions reinforce our market relevance and strengthen our financial resilience but, more importantly, they create exceptional customer experiences and the basis for lifelong trust. Our customers see and feel our openness, transparency and our sense of shared ambition.



SUSTAINABILITY

Visionary engineering is changing the world, and we have a leading role to play in shaping its future. This comes with considerable responsibility that, in meeting our business needs, we do not compromise the ability of future generations to meet theirs.

To do this, we will pursue technologies and methodologies that reduce our environmental impact and help us to deliver positive, measurable, environmental, societal and economic effects in the global geographies we operate in.

INTRODUCTION TO OUR CODE.

Our Code and you

Our Code applies to every person within the Bodycote Group and every part of the Bodycote Group.

- We are all expected to take personal responsibility for ensuring that our behaviour is consistent with our Code.
- We must all read and understand the principles set out in our Code together with our Values, the Group policies referred to throughout our Code and other policies, procedures and standards that apply to our roles (including applicable Employee Handbooks) and ensure that we comply with them at all times. We expect our business partners to act with similarly high ethical standards.

In this Code, we do not attempt to set out all the legal and company requirements that apply across our markets. So, in addition to this Code, you should make sure you understand the legal standards and restrictions applicable to your role in particular and conduct yourself accordingly. To help us understand the important subjects included in our Code, we also provide detailed training. If you are unclear on anything contained in the Code or how you should apply it in a specific situation, please ask for help. Remember that compliance with the letter of the law is not always enough and we must strive to act in accordance with its spirit and intended outcomes.

If you would like to report any matter anonymously and confidentially, please use our Open Door Line.

You can access it by calling the free-phone lines detailed at the end of this Code or by sending an e-mail to bodycote@getintouch.com.

Our Code does not form part of any contract of employment or contract to provide services, and Bodycote may amend it at any time.



Living our Code

In every matter we come across that is covered by our Code, we should ask ourselves the following:

Is this action consistent with the principles of our Values and our Code?

Am I setting a good example?

Would I or Bodycote be comfortable if the action were written about in the media?

Would I be happy explaining what I did to my co-workers, family and friends without embarrassment?

Have I consulted others who have knowledge of the matter and sought advice to help me make an informed decision?

If you would like advice or support about any matters related to the Code, or if you witness any actions or behaviours you believe are not consistent with the Code, please raise the issue with one of the following:

Immediate manager

Someone else in the management structure, including a member of the Executive Committee

Local Human Resources Business Partner

By calling or emailing the Open Door Line. See page 19 for details

All reports will be confidential and taken seriously. Bodycote is committed to protecting those who raise concerns in good faith and will not condone any form of retaliation as a result of raising a concern.



HOW WE DO BUSINESS.

Anti-bribery and anti-corruption

Bodycote has a zero-tolerance approach to bribery and corruption. Simply put, our Anti-Bribery and Anti-Corruption Policy prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or any other form of incentive.)

We do not accept bribery or corrupt business activity of any kind, regardless of whether it is undertaken directly or through a third party. This means we must not offer, provide or accept, directly or indirectly, any financial or other advantages, including facilitation payments and kickbacks. It applies to any person or body including any public official, political party, customer, employee or agent of a customer, lending agency or bank. It also applies to any employee or agent of a lending agency or bank with a view to obtaining or retaining or providing business or securing any financing facility or favour that infringes regulations.

We only appoint intermediaries to represent us in the sales process if they can demonstrate they fully comply with the principles of our Code and Anti-Bribery and Anti-Corruption Policy.

We provide an interactive training course and have appointed Anti-Bribery and Anti-Corruption Officers to assist us remaining compliant with the Anti-Bribery and Anti-Corruption Policy.

More information: Our Anti-Bribery and Anti-Corruption Policy explains what to look out for and how to avoid it, and gives the details of our Anti-Bribery and Anti-Corruption Officers. You should also read our Fraud and Theft Policy and our Share Dealing Policy. If you would like to report any concern please refer to our Open Door Policy (see page 19).

Gifts and hospitality

We discourage employees from accepting or giving gifts or hospitality. We recognise that the occasional modest giving and acceptance of gifts and hospitality may be a legitimate contribution to good business relationships. However, it is essential that they do not influence, nor could be perceived as influencing, business decision making. We must all consider whether the giving or receiving of a gift or hospitality is appropriate and ensure that they are given and received openly and without any attempt to mislead or hide their nature, value, purpose, or identity of the giver and recipient. We do not seek to influence government officials, departments or agencies through the provision of gifts or entertainment or other inappropriate means. We must follow the guidance contained in our Gifts and Hospitality Policy when accepting or giving gifts and hospitality.

More information: Our Gifts and Hospitality Policy provides further details and guidance as to what we must do when accepting or giving gifts or hospitality. Our Anti-Bribery and Anti-Corruption Policy explains what to look out for to identify bribery and corruption and sets out how to avoid it as well as providing details of our Anti-Bribery and Anti-Corruption Officers. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.



Charitable and political contributions

Political contributions are often subject to national laws and vary from country to country. Even when legally permitted, contributions can be a source of manipulation or seen as questionable. On that basis, we do not make contributions—either financial or in-kind—to political parties or organisations, or to individual politicians.

Charitable contributions may be made in the name of a Bodycote company or using its resources as long as they are relevant to the communities in which we operate and in compliance with applicable laws and regulations. In every case, contributions require approval by the CFO. It is prohibited to make charitable donations that may contravene our Anti-Bribery and Anti-Corruption Policy. For example, if the donation could influence, or be seen to influence, the outcome of a transaction or decision relating to our business. Donations should also not be made that are in breach of our Conflicts of Interest Policy.

You are free to make personal charitable or political contributions, but you must ensure that personal funds are not used as a means of avoiding compliance with our policy (regardless of whether you plan to seek reimbursement from the company). Such contributions must not be reclaimed as personal expenses.

More information: Please read our Anti-Bribery and Anti-Corruption Policy and our Conflicts of Interest Policy. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.



Trade compliance

We are committed to complying with all applicable national and international regulations, including embargoes, sanctions, import and export controls, tariffs and customs, and anti-money laundering regulations. Substantial penalties can apply to the Group and to individuals if we do not comply.

All Bodycote companies importing and/or exporting services (including technical information, assistance and training) and/or goods (which belong to Bodycote or another party) must comply with applicable export and import laws and regulations and obtain proper authorisations for the export and import of services and goods. There is further detail in our Import and Export Policy.

We must also all comply with national and international sanctions and embargoes when doing business with companies in other countries. Special attention should be given to dual-use items (services and goods which can have an application to both civil and military fields). There is further information in our Trade Sanctions Policy.

Money laundering is the processing of criminal proceeds in order to disguise their illegal origin. We should pay close attention to the way payments are made. This will help detect any irregularities with business partners and customers who demonstrate suspicious behaviours in their operations. We have issued our Anti-Money Laundering Policy to provide further information and controls in respect of anti-money laundering and to provide details of our Money Laundering Reporting Officer.

More information: We should read and make regular reference to our Import and Export Policy, our Trade Sanctions Policy and our Anti-Money Laundering Policy to ensure that we comply with the requirements of these important subjects. Please refer to our Open Door Policy (see page 19) if you would like to report any concern.

Our customers and suppliers



Customer experience is at the forefront of how we provide our services. We treat all our customers and suppliers with honesty and transparency. We maintain the confidentiality of information given to us by customers and suppliers, using it responsibly and in the way agreed. We must ensure that in all dealings, quotes and contract negotiations, all statements, communications and presentations are accurate and truthful.

We are committed to achieving and exceeding our customers' expectations.

Decisions to purchase from suppliers and to engage with any other third parties as intermediaries, distributors or agents are based on an objective assessment of reliability, transparency and value in achieving objectives. When seeking suppliers and other third party support, we conduct thorough due diligence. We only select suppliers and other third parties who comply with our Supplier Code and whose values and commitment to conducting business match our own.

More information: Our Contracts Policy provides information on the agreements we must arrange with our customers and suppliers. Our suppliers are required to comply with our Supplier Code. Please also refer to our Anti-Slavery and Human Trafficking Policy.

Fair competition

We respect fair and honest competition and business dealings. Competition and anti-trust laws are intended to ensure open and fair competition among companies. We must always comply with these laws and training is available to help us understand what constitutes restricted anti-competitive behaviour. We will not discuss or participate in any agreement with competitors with the intent or effect of fixing prices, distorting a bidding process, dividing a market, limiting supply of service or production of product, or boycotting a customer or supplier. We will not share the details of specific customer and supplier contracts or negotiations with our competitors, other customers or suppliers. We will immediately report our concerns of any discussions or behaviour which is not permitted.

More information: Our Competition and Anti-Trust Policy provides further information. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.

Anti-tax evasion

Conducting our business in accordance with our Values includes considering how we interact with tax authorities.

Tax evasion is the unlawful act of not paying taxes, typically by submitting false information or failing to report taxes owed to the appropriate authorities. Where it is done deliberately and dishonestly, tax evasion and the facilitation of tax evasion are criminal offences. Bodycote has a zero-tolerance policy to tax evasion. We will not knowingly take steps towards the fraudulent evasion of tax in any country by an employee or another person. We will also never help, advise or instruct any business or person to commit that offence. We must always follow our Anti-Tax Evasion Policy and immediately report any concerns we have on the subject. Training is provided to relevant employees to help their understanding.

More information: Our Anti-Tax Evasion Policy helps to ensure we can recognise tax evasion and report our concerns. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.

Fraud and theft

Fraud covers any action that intentionally attempts to gain an advantage or a benefit that: a person or business is not entitled to receive; attempts to cause loss; results in making a false representation or in a failure to disclose information; or that falsifies or obscures records. Theft is any act in which property belonging to another is taken without consent. We all must have a zero-tolerance towards fraud and theft, whether by a front-line employee, a senior manager or a Board member, and must always act to prevent fraud and theft. All offences will be reported to local law enforcement agencies. All of us are required to report all suspected cases of fraud or theft to our line manager, through our Open Door Line, or via another appropriate channel. All allegations and investigations of fraud and theft will be treated with the highest confidentiality. We provide training to help ensure everyone is aware of the importance of preventing fraud and theft.

More information: We must all read our Fraud and Theft Policy to understand what fraud and theft is, what we can do to prevent it and how to address any cases of fraud and theft. We should also consider our Anti-Bribery and Anti-Corruption Policy, remembering to refer to our Open Door Policy (see page 19) to report any concern.

Record keeping

As a global company operating across multiple jurisdictions, it is essential to record all our business dealings—from sales transactions and tax returns to supply agreements and employee files. Record keeping is critical to ensuring compliance with our legal obligations, such as anti-bribery and anti-corruption laws, and helps us to manage our finances and operations. The records we keep must always be accurate and complete, and we must retain them for as long as we are legally required to do so in all countries in which we operate. Records should be completed with integrity and never with false or misleading information. All applicable legal requirements should be followed when disposing of any of our records.

More information: We must all read our Fraud and Theft Policy and refer to our Open Door Policy (see page 19) to report any concern.

Inside information and share dealing

As a listed company on the London Stock Exchange, we must comply with laws relating to inside information and share dealing.

In the course of business, some of us may have access to information that could affect the value of Bodycote's shares or those of another company if it were to become public. This is known as 'inside information'. Examples include the details of our financial results, trading updates, acquisitions or disposals of businesses, or other commercial developments. Generally, it is a criminal offence and constitutes market abuse to deal or trade in shares when in possession of such information. We must never make such transactions.

In addition, we must never give or disclose inside information to anyone else—whether to other employees (unless specifically authorised to do so), family members, friends or business associates—nor encourage them to deal in shares based on such information. If you are in any doubt as to whether you should discuss or disclose information, or whether you are able to trade in shares, you should seek advice from Bodycote's Company Secretary. The Group also operates a Dealing Code, which applies to the Company's directors and to employees who can access restricted information about the Group (e.g. employees engaged in the preparation of the Group's financial reports and those working on other sensitive matters). The Company Secretary will tell you if you are required to comply with the Dealing Code and you will also receive training in respect of the Market Abuse Regulation.

More information: Please read our Share Dealing Policy and refer to our Open Door Policy (see page 19) if you would like to report any concern.



Conflicts of interest

A conflict of interest is any relationship, influence or activity that will impair, or even appear to impair, our ability to make fair and objective decisions when performing our jobs. A conflict of interest can take many forms, including: managing or recruiting a family member or friend; having a second job; holding financial interests in suppliers or competitors; or serving on the board of directors of another company. A conflict of interest could also arise if an employee were in a personal relationship outside of work with a direct report, as this could affect their impartiality in performance evaluations and promotions. When a conflict of interest arises, it can cast doubt on our honesty and have a damaging effect on our reputation for customers, shareholders and employees.

Conflicts of interest must be avoided or carefully managed. In all cases you must act honestly and disclose a conflict to your line manager or Human Resources Business Partner, or by using the Open Door Line as soon as you become aware of it.

More information: Please refer to our Conflicts of Interest Policy and our Anti-Bribery and Anti-Corruption Policy. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.

PROTECTING OUR ASSETS.

Bodycote's assets include physical or tangible items (such as equipment); non-physical or intangible items that employees develop in the course of their work (such as ideas or know-how); and other assets such as customer and supplier lists and other market data. These assets are vital to our business. We should all do our utmost to protect our assets. We should not use any assets illegally or for purposes not related to our business. We should ensure that assets are not lost, damaged or wasted.

Confidentiality and intellectual property

Confidential information, including intellectual property, is information you have access to as part of your role that is not known to the public and is sufficiently sensitive that loss, or unauthorised disclosure or access, could result in harm to the company. Examples of confidential information include trade secrets; details of our inventions, ideas and designs, processes and know-how; technical information; unpublished financial data; customer and supplier records; and information about our business plans.

It is critical for us to protect written and unwritten confidential information. We must protect confidential information through: keeping it securely and only for as long as needed; and by not disclosing information or, where absolutely necessary, only disclosing information subject to an appropriate confidentiality agreement/non-disclosure agreement.

If you become aware of any actual or potential unauthorised disclosure of our confidential information, or if you have concerns relating to a request to provide company information to a third party, please seek advice from your line manager.

More information: You should read our Share Dealing Policy and our Intellectual Property Policy and refer to our Open Door Policy (see page 19) if you would like to report any concern.

Data protection

Bodycote ensures individual privacy is safeguarded by only handling personal data in accordance with appropriate laws in order to meet legitimate business needs and legal requirements.

To operate effectively, we need to collect and retain certain personal data about our employees, customers, suppliers and other third parties. Personal data is information that can be used to identify an individual. Examples include names, contact details or bank account details. Failure to comply with local data protection laws can result in significant penalties.

You must only collect personal data for legitimate business purposes, and you must keep it secure so that it isn't lost or misused. You must delete personal data when it is no longer required, in line with our retention policies.

If you become aware that any personal data has been lost or someone has disclosed or accessed any personal data without authorisation, you should contact our Group General Counsel or Chief Human Resources Officer immediately for advice.

Bodycote may periodically review messages for security and other business purposes in accordance with applicable laws and regulations.

More information: Our Data Protection Policy and relevant Privacy Notices set out the principles we follow to protect data. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.



Information technology (IT)

The appropriate use of our IT networks and systems, as well as protecting, storing and handling information correctly, is a shared responsibility.

Security

All employees have a role to play in ensuring the security of the Bodycote IT systems and data. We can do this by never sharing passwords and looking out for phishing emails or suspicious requests. Employees should also make sure their devices are securely logged off or locked when not in use. Any security breaches or hardware theft should be reported immediately to the Group IT team in addition to local authorities.

Use of portable computing devices

Users of portable computing devices are accountable for their physical security and must take reasonable steps to protect these devices from loss, damage or theft. Devices must always be powered off when not in use and never be left unattended in vehicles.

Use of the internet

Employees are expected to use the internet in a responsible and acceptable manner that does not harm Bodycote. It is understood that Bodycote may monitor internet usage to ensure compliance with applicable policies.

Use of instant messaging

Instant messaging should be used professionally and responsibly. Users must avoid sharing sensitive or confidential information over these platforms. Personal conversations should be minimal, and any communication that could damage Bodycote's reputation must be avoided.

Use of social media

When engaging with social media, we must not represent Bodycote unless explicitly authorised and should not share content on personal accounts that could negatively impact Bodycote's reputation. It is important that we all make sure that posts do not compromise Bodycote's confidentiality and refrain from sharing proprietary information or participating in behaviour that contradicts Bodycote's values.

Use of artificial intelligence

Generative artificial intelligence (AI) refers to AI that can create new content, such as text, images, music and code, based on patterns from existing data. Employees must use generative AI responsibly and safely, ensuring it does not harm individuals or Bodycote. Confidential business information or personal data must never be entered into generative AI tools. Any task involving generative AI must prioritise data privacy, intellectual property protection, and fairness, while avoiding bias.

More information: Please read our Information Technology policies.

Communications

It is essential for our reputation that our communications, both internally and externally, are accurate, clear and consistent. Media and other external communications must be managed in a coordinated way, by authorised spokespersons, and messaging must be deliberate and aligned with our policies. Company information that is confidential and proprietary should never be shared with anyone outside Bodycote.

All corporate press releases and other types of formal publicity must be approved by the Chief Marketing Officer before being added to the Company website, distributed to the press or appearing on social media platforms. Any press release containing financial information must also be approved by the Chief Financial Officer.

If you are ever contacted directly by media for corporate information or a statement, you should direct the enquiry to the Chief Marketing Officer. You should never communicate on behalf of Bodycote without prior written approval.

More information: Please refer to our Open Door Policy (see page 19) if you would like to report any concern.

Our brand

Our company's image is vital to our business. The Bodycote brand is used globally to leverage its strong reputation, across our businesses and international network of facilities. Our brand promises customers world-class metallurgy, including knowledge, experience, specialist expertise and quality service when and where it is needed.

Our brand is a critical asset, encompassing more than just a logo or colour palette. Understanding its significance and integrating it into the company is crucial to enhancing its value. When representing our brand visually, follow the identity guidelines and style guides and use the provided templates to ensure accurate and consistent branding.

More information: Please contact a member of our marketing team.

OUR WORKPLACE.

Bodycote is a service business, reliant on its people at all levels. We have exceptional teams who understand the needs of our customers and are committed to delivering outstanding performance for them and for our shareholders.



Health & safety



For us, safety is not just our first value, it is a prerequisite in all we do. Our belief in ensuring all our people return home from work safe and well far exceeds the demands of regulation and compliance. It ensures our people, partners and customers always feel protected, able to flourish and operate with confidence.

We have a strong health and safety culture that encourages awareness, individual responsibility, the maintenance of high standards and promotes open and constructive criticism so that we can continually improve our practices.

We believe that all occupational health and safety incidents are avoidable. We strive to protect people's health, and aim for zero injuries and safety incidents.

Safety is everyone's responsibility and all employees must accept accountability for working safely. We expect four simple rules to be upheld at all times:

- **We report any health and safety issue or opportunity**
If we see something, we do something. We immediately report any unsafe conditions, actions, observations, injuries or incidents. We make constructive challenges; we do not criticise.
- **We are not afraid to stop**
If we are not sure how to do something, we stop and we ask; we do not proceed. If we spot any imminent danger, we ALL have the right and responsibility to stop any process or activity.
- **We always look after ourselves and others**
We take responsibility for the health & safety of ourselves and others. We always follow the rules and ensure safe systems of work and procedures are in place for a task or process. We never bypass or interfere with any safety device.
- **We only carry out activities for which we are trained, competent and authorised**
We never undertake any activity for which we are not trained, competent and authorised.

More information: All employees are expected to read and follow the Health and Safety Policy. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.



Conduct in our workplaces

We are committed to ensuring Bodycote continues to be a great company to work for, with a culture that allows every one of us to thrive. Central to this culture is treating each other with respect and kindness. We expect everyone to conduct themselves in a professional manner at all times and to behave with courtesy, thoughtfulness, dignity and respect.

We expect all colleagues working for the Company or on its behalf to uphold our Values and not to engage in any behaviour that could be considered discriminatory, bullying, harassing, offensive, disrespectful or inappropriate. Bullying or harassment against our people, including via social media, will not be tolerated. When we observe inappropriate or unacceptable behaviour, including but not limited to sexual harassment, we have an obligation to do something about it. This may involve discussing the behaviour with the person involved, reporting the behaviour to a manager, or using the Open Door Line (see page 19) if appropriate.

To ensure a safe and professional work environment, you must not be under the influence of alcohol or drugs whilst at work. The use, possession, distribution or sale of illegal drugs or alcohol on company property or whilst performing employment duties is strictly prohibited.

More information: We all must comply with our Equality, Diversity & Inclusion Policy and be committed to providing a working environment free from harassment by acting in accordance with this Policy and our Sexual Harassment Policy. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.

Our conduct during business travel

You may on occasion travel nationally or internationally as part of your job. You are expected to maintain professional conduct at all times and refrain from behaviours that do not meet our standards, even if they are legal or acceptable locally in the country you are visiting. If you have any concerns about workplace conduct, you should promptly report them to your line manager or HR team.

More information: You should read our Sexual Harassment Policy and our Travel and Expenses Policy. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.

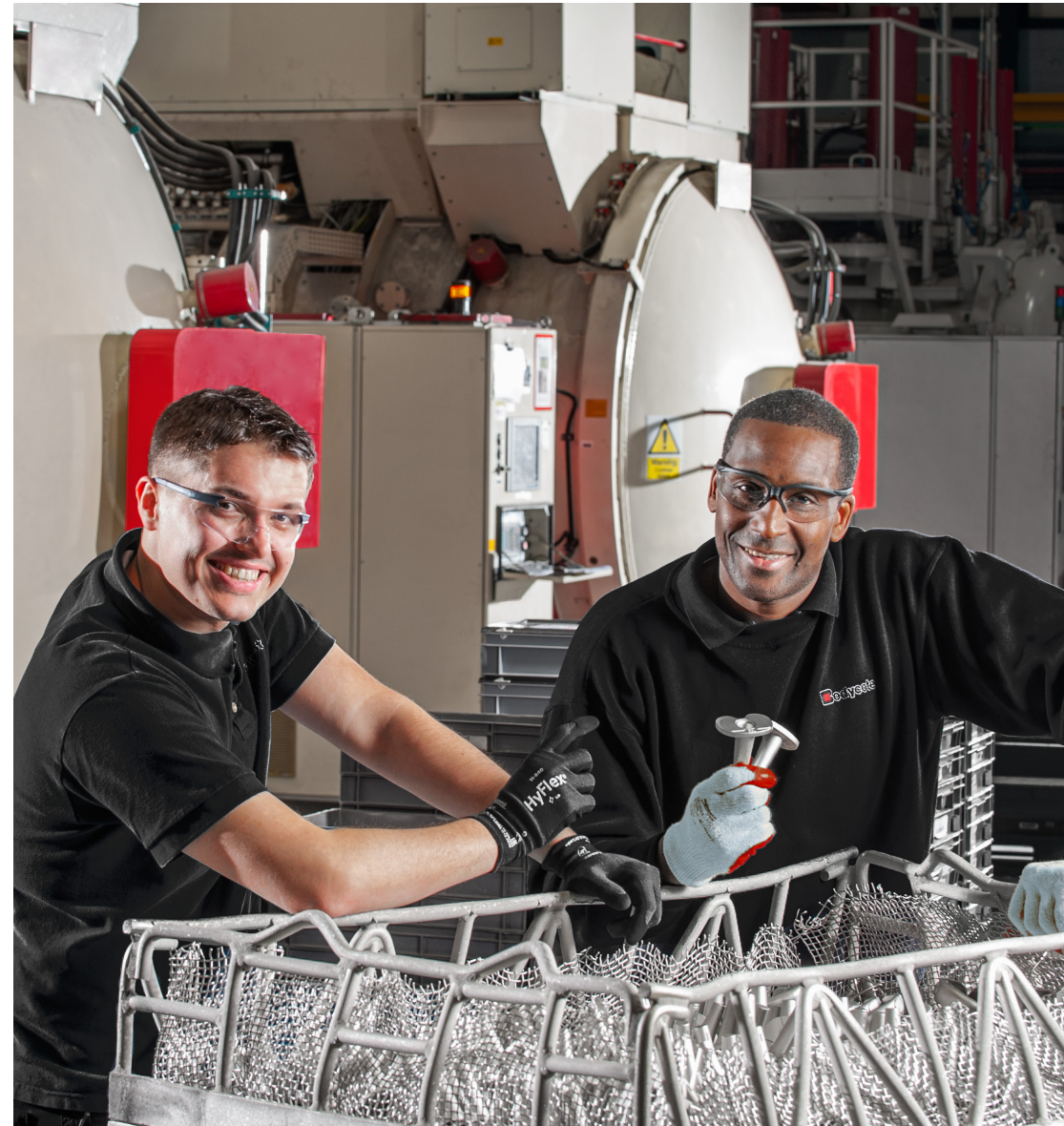
Equality, diversity and inclusion

Bodycote recognises the value of a diverse and skilled workforce and is committed to creating and maintaining an inclusive and collaborative workplace culture. We understand that not everyone is starting from the same place, has the same challenges, or requires the same level of support, and so our approach is to make sure everyone has the support they need to succeed.

Our overarching Equality, Diversity & Inclusion Policy outlines our stance on maintaining equal opportunities and giving full, fair and impartial consideration to all applicants in a recruitment process. Our employment policies are designed to maintain equal opportunity irrespective of age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual orientation, political or philosophical opinions or trade union membership, as well as military and veteran status in North America.

We embrace a culture of acceptance and inclusion, accommodating part-time, agile and flexible working requests where appropriate, and we take a zero-tolerance position on harassment of any kind.

More information: We must all comply with our Equality, Diversity & Inclusion Policy and be committed to providing a working environment free from harassment by acting in accordance with this Policy, Employee Handbooks and local HR policies and our Sexual Harassment Policy. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.



SUSTAINABILITY AND SOCIAL RESPONSIBILITY.



Bodycote is committed to making a positive contribution to society by effectively managing social, environmental and ethical matters. As well as being the right thing to do, we believe this is key to strengthening long-term relationships with all stakeholders.

As a global leader in the thermal processing industry, we take responsibility for being at the forefront of decarbonisation and setting the standard for sustainability. We recognise our opportunity to influence emissions and environmental performance across many end-markets. As well as impacting the Group's own productivity, our sustainability record influences customers' performance by extension. We process components for a wide range of industries and have an extensive sphere of influence. We view robust sustainability practices as crucial to the successful execution of our strategy, as we continue to leverage our scale and technical expertise to assist our customers in their sustainability efforts.

Bodycote is also committed to transparent communication of our sustainability policies, actions and performance. Our strategy and goals are outlined in our Sustainability Report, accessible on the Group website.

Our commitment to sustainability and compliance with relevant laws and regulations must be matched by our supply chain. We expect our Suppliers and Subcontractors to outline their sustainability efforts, have a sustainability policy and demonstrate their efforts to support sustainable procurement practices along the value chain.

More information: Please read our Supplier Code.

Human rights and modern slavery

Bodycote acts in accordance with the UN Guiding Principles on Business and Human Rights in everything we do. In particular, we will not discriminate; we will not abuse or harass employees; we will meet or exceed applicable minimum pay, and compensation will meet or exceed the threshold allowing basic needs to be met and for a decent standard of living to be maintained; we will meet benefit and working time requirements; we will not use forced or underage labour; and we will exercise and promote good health and safety practices.

Our Modern Slavery Statement can be found on the Group website.

Bodycote has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships. We will implement and enforce effective systems and controls to make all reasonable efforts to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains. Training is available to help us recognise where there may be risks of modern slavery and human trafficking within the business and our supply chain. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes modern slavery, raise it with your line manager or through the Open Door Line. We will support anyone who raises concerns in good faith, regardless of the outcome.

More information: Our Human Rights Policy provides the framework for our approach to human rights. Our Anti-Slavery and Human Trafficking Policy provides details as to our zero-tolerance approach to modern slavery. Our suppliers are required to comply with our Supplier Code. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.

Environment

Bodycote is dedicated to upholding the highest standards of environmental responsibility. We aim to reduce our environmental impact through the efficient use of resources, waste minimisation, and the implementation of sustainable practices across all areas of the operation. Our Environment Policy reflects our commitment to reducing our carbon footprint and promoting long-term environmental sustainability. We expect all employees to adhere to these principles and to integrate environmentally mindful practices into their daily work. By doing so, we can collectively contribute to a more sustainable future for our organisation and across the wider community.

More information: You should also refer to our Environmental Policy.

Conflict minerals

In politically unstable areas, the trade of tin (extracted from cassiterite), tantalum (extracted from columbite-tantalite, also known as coltan), tungsten (extracted from wolframite) and gold can be used to finance armed groups, fuel forced labour and other human rights abuses, and support corruption and money laundering. These minerals, also known as 3TG, are defined as 'conflict minerals'.

We are committed to sourcing our supplies responsibly and to supporting global efforts to eliminate the use of conflict minerals. We will ensure that we do not knowingly procure conflict minerals, and that our procurement practices do not fuel or exacerbate conflict. These efforts avoid harm to people, reputational damage and potential legal liability. We will execute this commitment through due diligence, including prudent procedures and assessments, and we expect our suppliers to do the same.

More information: Please use the Conflict Minerals Procedure and related documents. Please also refer to the Supplier Code and the Anti-Slavery and Human Trafficking Policy. You can also refer to our Open Door Policy (see page 19) if you would like to report any concern.



BREACH OF OUR CODE.

We take any non-compliance of our Code very seriously. Failure to comply with our Code can result in criminal or civil action against Bodycote. An employee who breaches our Code may face disciplinary action, up to and including termination. Breaching our Code may also lead to the end of a relationship with a customer or supplier.





OPEN DOOR LINE.

If you would like to report any matter anonymously, Bodycote has established and promotes the use of its Open Door Line, where serious and/or sensitive matters can be reported confidentially.

Employees and third parties can access the Open Door Line by calling the free-phone lines detailed below or by sending an e-mail to bodycote@getintouch.com.

Austria	0800-292296	Lichtenstein	41-435016741
Belgium	32-28080361	Mexico	800-681-6732
China	4001-200577	Netherlands	31-850644044
Canada	1-855-257-1164	Poland	48-123953249
Czech Republic	420-228880025	Romania	40-215398269
Denmark	8070-5302	Slovakia	0-800-606-674
Finland	358 9 42725042	Sweden	46-313011803
France	0805-080025	Switzerland	41-435016741
Germany	0800-189-9316	Turkey	0800 621 2184
Hungary	06-800-16264	United Kingdom	0808 271 1360
Italy	39-0240708049	USA	1-855-257-1100

The service is available 24 hours, seven days a week. Our Open Door Policy and further details of the Open Door Line are available to all employees via the Bodycote group intranet and on employee notice boards around the Group's sites. It can also be accessed on our Group website.

Do not let any concerns go unaddressed or unresolved. We will support anyone who raises concerns in good faith.

This image shows a single sheet of white paper with horizontal dashed lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Notes

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