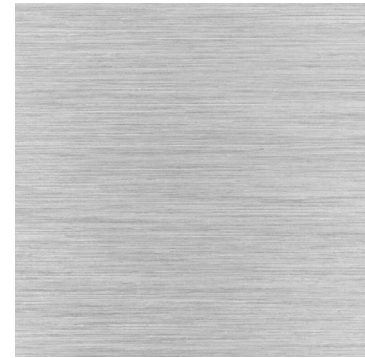
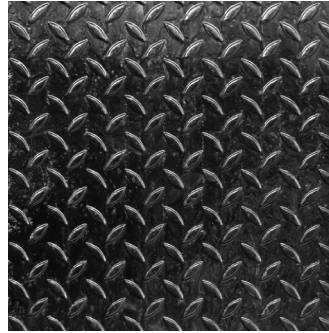
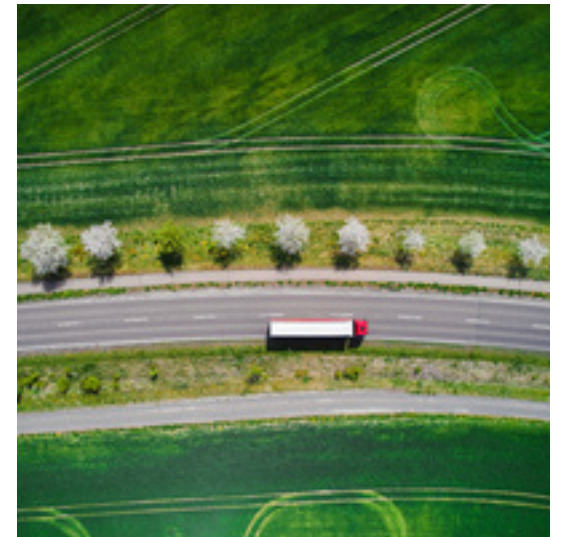


SUPPLIER CODE OF CONDUCT.



INTRODUCTION.

Bodycote has developed this Supplier Code to clarify Bodycote's expectations of our suppliers and their supply chains.

The principles contained within this Supplier Code are consistent with those set out in Bodycote's Code of Conduct (www.bodycote.com/investors/governance/our-policies). Bodycote's employees are each committed to our Code of Conduct, which sets out basic conditions and behaviours that guide relationships and ways of working with suppliers and other third parties.

This Supplier Code applies to all Bodycote's suppliers and subcontractors globally. Bodycote requires all suppliers providing goods or services to the Group to adhere to the principles outlined in this Supplier Code. Suppliers are expected to maintain robust management systems to ensure compliance with the key expectations set out in this Supplier Code, minimise the risk of deviations, and promote continuous improvement.

This Supplier Code outlines a set of 'best practice' expectations. This Supplier Code is not intended to conflict with or modify the terms of supplier contracts with Bodycote. If a contract, legal or regulatory requirement addresses the same areas as covered in this Supplier Code, suppliers must defer to those requirements.

Bodycote is committed to sustainable and responsible business practices and requires similar commitments from its supply chain partners. Bodycote's sustainability agenda promotes progress towards the United Nations Sustainable Development Goals and targets specific action on the following eight key areas.

SUSTAINABLE IMPACT

- Low-carbon thermal processes
- Solutions for improved product safety
- Greater resource efficiency
- Support for sustainable industries

RESPONSIBLE BUSINESS

- Zero harm safety culture
- Environmental leadership
- High employee engagement
- Inclusive and dynamic workplaces

Bodycote has set ambitious goals in each of these areas and expects supply chain partners to play their part by supporting the Group's performance in these areas and driving aligned action within their own businesses and supply chains.

As part of Bodycote's commitment to ensuring sustainable and responsible ways of working in our business as well as throughout our value chain, Bodycote may require suppliers to align to the ISO 26000 guidelines for social responsibility, and may request participation in third party assessments and audits to monitor progress.

Bodycote reserves the right to make reasonable changes to this Supplier Code from time to time to capture changes in the law or Bodycote's internal compliance requirements.

By doing business with Bodycote, suppliers acknowledge that they have read, understood and agree to comply with this Supplier Code. Suppliers must also keep a record of all relevant information and provide Bodycote supporting documentation upon request to demonstrate compliance with this Supplier Code. Bodycote reserves the right to engage, visit, inspect or audit suppliers, with or without support of a third party, to ensure that all parts of this Supplier Code are satisfactorily met. If the results of such an exercise cause us to believe that suppliers do not comply with this Supplier Code, suppliers shall take necessary corrective actions in a timely manner, as directed by us. In case of failure we may act, including suspending or terminating the supplier relationship with Bodycote.

If suppliers become aware that provisions of this Supplier Code have been violated in its own business area or in its value chain, suppliers must immediately take appropriate remedial action. In addition, suppliers are expected to inform Bodycote immediately of any confirmed violation of obligations arising from this Supplier Code that occurred in their own business area or their value chain or of any other official investigation. Suppliers are expected to include an equivalent reporting obligation in contracts with subcontractors, with subcontractors being required to submit the corresponding whistleblowing reports to the supplier.

Suppliers can raise questions or concerns by speaking to their Bodycote contacts or via the Bodycote Open Door Line (see page 08).

Contents



Legal compliance and governance	02
Business practices	03
Management of risk	03
Anti-bribery and anti-corruption	03
Gifts and hospitality	03
Trade compliance	03
Fair competition	03
Business records and financial crime	04
Conflicts of interest	04
Confidential information and intellectual property	04
Information security	04
Workplace environment	05
Health and safety	05
Harassment and bullying	05
Equality, diversity and inclusion	05
Terms of employment	05
Sustainability and social responsibility	06
Sustainability	06
Conflict minerals	06
Environmental standards	06
Human rights and modern slavery	07
Supplier concerns	08



LEGAL COMPLIANCE AND GOVERNANCE.

All suppliers must comply with any and all applicable laws, rules and legal regulations in the countries in which we and they operate.

Bodycote's Code of Conduct (www.bodycote.com/investors/governance/our-policies) is central to our conducting business responsibly and to high standards of governance. We expect our suppliers to implement and adhere to their own similar written code of conduct.

Further, suppliers are expected to have in place and maintain the following appropriately worded policies and standards, and adhere to them at all times:

- A Sustainability Policy, which includes demonstrating efforts to support sustainable practices throughout the value chain
- An Environmental Policy, including:
 - Waste Management
 - Water Consumption
- ISO 14001 certification or an equivalent environmental management standard
- An Equality, Diversity and Inclusion Policy
- A Human Rights Policy
- An Anti-Bribery and Anti-Corruption Policy
- A Fraud and Theft Policy
- A Gifts and Hospitality Policy
- A Supplier Code of Conduct, as a minimum addressing subjects as contained in this Supplier Code

These requirements form the basis of our commitment to responsible sourcing and ethical business practices.



BUSINESS PRACTICES.

Management of risk

Suppliers are encouraged to proactively manage and mitigate risk in their own supply chain and, where appropriate, to report risk to Bodycote to ensure that those risks are appropriately mitigated. Suppliers shall engage in procurement in a responsible manner. Bodycote expects its suppliers to conduct due diligence on their own direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct appropriate to their size and circumstances to promote transparency and traceability.

Bodycote expects active participation and support from its suppliers. Upon request, suppliers shall provide Bodycote with complete and accurate materials and information on its due diligence process and required management systems.

Anti-bribery and anti-corruption

Bodycote has a zero-tolerance approach to bribery and corruption, and we require all associated persons, including our suppliers, to act in line with this principle. Bodycote will not offer, give or receive, either directly or through any third party, including by way of facilitation payments, any financial or other advantage to obtain new business, retain existing business or secure any other improper advantage and we will not permit others to do so. Bodycote expects our suppliers to also act in this way. In addition, suppliers are expected to undertake reasonable due diligence to prevent and detect bribery and corruption in all of their business arrangements. Bodycote expects our suppliers to have appropriate and adequate procedures to prevent such activity from taking place.

Gifts and hospitality

Bodycote prohibits the offering or receipt of gifts, hospitality or expenses whenever they could affect or be perceived to affect the outcome of a business transaction. Promotional expenditures of this type are only considered legitimate where they are open and transparent, proportionate, reasonable, accord with general business practice and are made in good faith for a legitimate business purpose and not where they place the recipient under any obligation or create any expectation in the giver. Cash or cash equivalent gifts, regardless of value, will never be accepted. Suppliers shall have in place and adhere to a suitable gifts and hospitality policy.

Trade compliance

Bodycote expects our suppliers to ensure that their business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign parts and components and related technical data. We expect our suppliers to screen third parties with whom they do business and to be fully compliant with all relevant financial sanctions, trade embargoes and other restrictive measures imposed by any applicable government authority.

Fair competition

Bodycote expects all our suppliers to promote vigorous, open, honest and fair competition and to conduct business in accordance with all applicable anti-competition and anti-trust law and regulations. We expect our suppliers to prohibit any actions that falsify or distort free competition or market access and not be involved in any anti-competitive understandings or agreements including improper exchange of competitive information, price fixing, bid rigging or improper market allocation.

Business records and financial crime

Bodycote expects our suppliers to properly record and maintain accurate records including in respect of all financial aspects of their work, to represent themselves accurately to all relevant authorities, including tax authorities. Bodycote expects suppliers to ensure appropriate processes are in place to prevent, deter and respond to all forms of financial crime including tax evasion, money laundering, fraud and theft and the financing of terrorism by employees and other persons acting on behalf of our suppliers.

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. Bodycote expects our suppliers to identify and avoid actual, potential, or perceived conflicts of interest in their dealings with Bodycote. Bodycote is aware that such actual or potential conflicts of interest can arise in the course of business and Bodycote expects our suppliers to disclose without delay such matters to Bodycote and all affected parties.

Confidential information and intellectual property

A respect for confidentiality builds and develops trust. It allows for the free flow of information and enables a successful collaborative partnership. Bodycote expects all our suppliers to ensure that confidential business information and intellectual property including know-how gained by virtue of the business activities with us are held in strict confidence and not improperly used or disclosed to third parties. In addition, we expect our suppliers to comply with all contractual obligations, applicable laws and regulations governing confidential information and intellectual property.

Information security

Bodycote expects our suppliers to develop, implement and maintain appropriate security measures to protect the information that they create, collect, handle, store or are responsible for, in accordance with applicable laws, regulations and contractual requirements, regardless of whether such information belongs to the supplier, Bodycote and/or its customers. We expect our suppliers to address any security issues proactively and to notify and support Bodycote in responding to and remedying any security breaches.

Bodycote encourages the innovative use of artificial intelligence (AI) by its suppliers to enhance competitiveness and drive future growth. Suppliers who develop or use AI are expected to do so responsibly, in line with this Supplier Code and all relevant legal, ethical and regulatory standards.



WORKPLACE ENVIRONMENT.

Health and safety

Bodycote takes the health and safety of its employees, visitors, contractors, customers and suppliers very seriously. This is something we expect everyone to play a part in. It is our legal and moral responsibility to take care of ourselves and others. Suppliers shall provide and maintain a safe work environment and integrate sound health and safety management practices into their business. This must include occupational health and safety risk assessment; implementation of adequate hierarchy of controls; and communication to and training of workers. Workers must have knowledge of any inherent risk involved in the process (e.g. chemical exposure, physical risk etc.) and access to protection. Workers must have a recognised right to refuse unsafe work and to report unhealthy working conditions. Suppliers shall provide workers with appropriate personal protective equipment and properly maintain physical guards, interlocks and barriers where machinery presents an injury hazard to workers. Suppliers shall commit to have no deviation to health and safety regulations, including a periodic health check-up of workers. Physically demanding work is to be identified, evaluated and controlled. Onsite training on workplace health and safety must be done. Ready access to potable water, sanitary food preparation and clean toilets must be made available. When provided by suppliers, housing facilities and food must be maintained in hygienic conditions in accordance with local laws. Recognised management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health can be used as a reference.

Harassment and bullying

Bodycote does not tolerate harassment or bullying. Suppliers' workers must not be exposed to corporal punishment, or disciplinary measures and/or behaviour that violate dignity, liberty and basic human rights. Any behaviours, including gestures, language and physical contact, which is sexual, coercive, threatening, abusive or exploitative is prohibited.

Equality, diversity and inclusion

Bodycote has a zero-tolerance approach to discrimination based on age, disability, gender, marital or civil partner status, parental status, race, nationality, ethnic or national origin, colour, creed, religion or belief, political affiliation, union membership, sexual orientation, or any other personal characteristic. Bodycote expects our suppliers to foster a diverse and inclusive work environment where every employee, customer, supplier and partner is treated with dignity, respect and fairness in all aspects of employment (e.g. recruitment, promotion and remuneration). Our suppliers are expected to provide equal employment opportunities without discrimination on the basis of race, colour, creed, age, gender, sexual orientation, ethnicity, religion, political affiliation, union membership, marital status etc. and to comply with all applicable non-discrimination laws and regulations. Through inclusive sourcing processes, suppliers are expected to give equal opportunities to socially and economically different categories of suppliers.

Terms of employment

Our suppliers shall commit to implementing a fair policy of employment and remuneration in compliance with applicable laws, regulations and rules.

Compensation extended to the workers shall be at least the legal minimum standards. In countries where there is no national minimum wage, compensation should meet the threshold allowing for a worker's basic needs to be met and for a decent standard of living to be maintained, based on the geography in question. This must include the legally mandated benefits for workers such as social security, paid leave etc. In case of overtime work, the wage shall be paid at premium rate. All wage calculations, including payment and standard deductions must be done in a clear and transparent manner and communicated in written form, e.g. wage slip, in a language that is understandable to the worker. No disciplinary deduction of wages shall be made.

Suppliers shall ensure that working hours, including overtime, will not exceed applicable legal requirements, and where such requirements do not exist, the working hours will not exceed sixty hours per week including overtime (48 regular hours of work per week and a maximum of 12 hours of voluntary overtime). Workers must get at least one day off after six consecutive days of work.

SUSTAINABILITY AND SOCIAL RESPONSIBILITY.

Sustainability

As global leader in the thermal processing industry, Bodycote takes responsibility for being at the forefront of decarbonisation and setting the standard for sustainability more broadly. Bodycote's sustainability strategy is rooted in our business strategy, which focuses on providing a world class range of metallurgy solutions and cutting-edge specialist technologies that enable customers to produce better, stronger and more sustainable components. Our sustainability strategy is designed to advance our customers' priorities (service, quality, expertise and sustainability), and our own business priorities (leadership, technology, culture and responsibility). In so doing, Bodycote advances progress towards five key United Nations Sustainable Development Goals (UN SDGs): (5) Gender Equality; (8) Decent Work and Economic Growth; (9) Industry, Innovation and Infrastructure; (12) Responsible Consumption and Production; and (13) Climate Action. We expect our Suppliers to align to our sustainability goals and support our work to advance progress towards these UN SDGs, by reviewing their own operations, setting ambitious time-bound targets, and initiating bold actions in the areas referenced in this Supplier Code, to contribute to improved standards of environmental protection and sustainable business practices throughout our global supply chain.

Conflict minerals

Bodycote expects our suppliers to source materials, including constituent minerals, responsibly, and by undertaking appropriate due diligence, to support efforts to eradicate the use of any minerals that directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses.

Environmental standards

Bodycote is committed to environmental leadership, with sustainability and environmental responsibility embedded in everything we do. We expect our suppliers to implement effective management systems and procedures to assess and mitigate environmental risks. Suppliers shall maintain environmentally responsible practices, establish controls to minimise impact, and designate a competent person to oversee and manage these efforts. In particular, Bodycote expects suppliers to undertake the following:

- Measure their greenhouse gas emissions and set ambitious reduction targets. Actions to reduce emissions should incorporate energy efficiency measures, electrification, the use of renewable and low-carbon energy, as well as innovation in technology and materials used. Suppliers are also expected to challenge their own supply chains to adopt a similar approach.
- Identify and comply with all relevant environmental laws, including obtaining and maintaining valid permits, licenses, or registrations; meeting prescribed performance standards; monitoring discharges; and submitting required reports and filings on time.
- Implement management systems to identify, manage, and reduce environmental risks from operations to prevent environmental hazards and pollution, including air emissions, effluent discharge, waste disposal and hazardous substances.
- Conserve and use natural resources responsibly, including raw materials, minerals and fossil fuels. This can be achieved by reassessing production processes, increasing recycled content in products and materials, exploring alternatives, controlling waste, and adopting circular business models.
- Comply with all regulatory and customer requirements regarding the prohibition or restriction of specific substances, including critical raw materials and those prone to being sourced from conflict zones, as well as other relevant regulations.

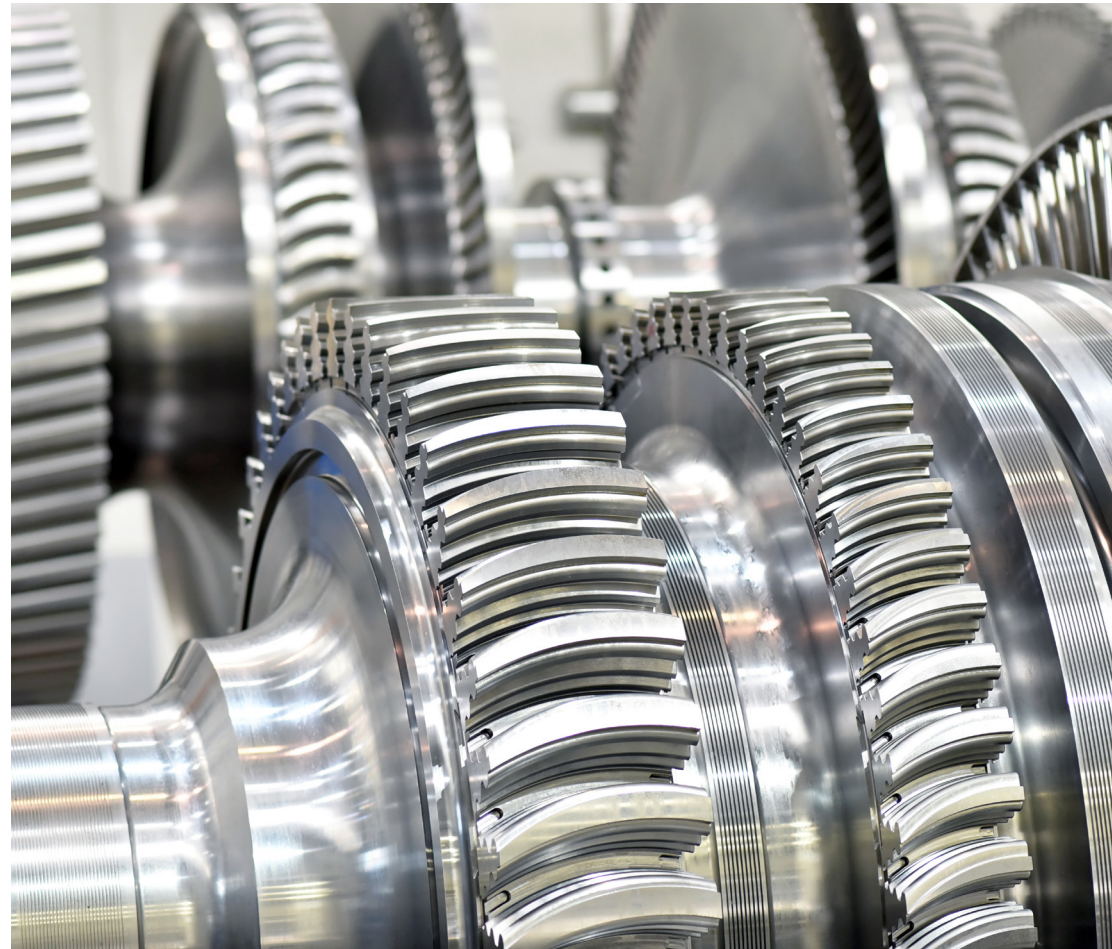
Human rights and modern slavery

Bodycote expects our suppliers to uphold and protect human rights. Our suppliers are expected to undertake appropriate due diligence to identify human rights risks, supported by systems and processes to minimize the risk of abuses occurring.

Bodycote is committed to maintaining an ethical and transparent supply chain free of all types of modern slavery and human trafficking. It is the right of all people to receive fair, equal and non-discriminatory consideration in access to, and in the processes of, employment. Suppliers are expected to operate in close compliance with the UN International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the ten principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the International Labour Organization (ILO) Forced Labour Convention (No. 29) and the Abolition of Forced Labour Convention (No. 105). Suppliers must not engage in any form of modern slavery, including human trafficking. All work must be voluntary on the part of the employee. No forced, bonded (including debt bondage), involuntary prison labour or victims of slavery, human trafficking or coercion shall be used in employment. All employees shall have basic liberty, dignity, freedom of movement and clearly written contracts in language that is understandable to them. Workers must have freedom to leave the employment at reasonable notice without any penalty or obstruction. Suppliers shall not withhold original documents or wages of the workers, migrant or otherwise.

In conformance with local laws, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Suppliers must also facilitate freedom of association and collective bargaining in situations where they may be restricted under law (e.g. works councils).

Employment of child labour is strictly prohibited in any form. The term child refers to any individual under the age of 15 or under legal minimum age, as defined by local law—whichever is higher. In case of employing young workers (15–18 years), appropriate safeguards must be implemented to prevent exposure to hazardous work and hazardous working conditions. In case of employing students or interns as part of educational trainings, legal minimum age criteria must be respected. All appropriate measures required for young workers or interns, especially related to nature of work, duration of work, compensation and maintenance of necessary records shall be strictly adhered to.



SUPPLIER CONCERNS.

Bodycote actively encourages the reporting of anything that is concerning or that is not in line with this Supplier Code without fear of retaliation and we expect our suppliers to do the same. Whistleblowing processes must ensure the confidentiality, anonymity and protection of the whistleblowers are maintained.

Suppliers can raise questions or concerns by speaking to their Bodycote contacts or via the Bodycote Open Door Line, anonymously if required, by calling the free-phone lines detailed below or by sending an email to the service email address 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.

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



Bodycote plc
Springwood Court
Springwood Close
Tytherington Business Park
Macclesfield
Cheshire
United Kingdom
SK10 2XF

Tel: +44 (0)1625 505300
Email: info@bodycote.com