

## CODE OF CONDUCT

### **I. Compliance with Laws**

When conducting business and making business decisions VSMPO TiRus GmbH strictly follows the applicable laws and regulations of the countries in which operations are managed or services provided.

### **II. Human Rights**

We treat people with respect and dignity and we value them for sincerity and honesty.

### **III. Fair competition**

Transparent and fair behavior on the international market ensures the interests of VSMPO TiRus GmbH in the long term and is the basis of the company's policy. A restriction of fair competition and violations of antitrust regulations are not compatible with our corporate philosophy.

### **IV. Anti-Corruption**

We comply with the anti-corruption laws and regulations of the countries we do business with. We promote integrity and ethics in all aspects of our activities. We comply with all applicable laws and regulations on corruption, bribery, prohibited business practices, and extortion.

### **V. Money laundering**

All employees of VSMP TiRus GmbH are prohibited from taking measures, either alone or in cooperation with third parties, that violate money laundering regulations. Money laundering is understood to mean, in particular, the smuggling (e.g. by exchange or transfer) of funds or other assets originating from criminal offences into the legal financial and economic cycle.

### **VI. Conflict of interest.**

In the course of activities, the employees may find themselves in the situation, when their personal or economic interests' conflict with the company's interests. In case this situation occurs, the company resolves the issue openly and transparently.

### **VII. Integrity & Respect**

Based on the UN Charter and the European Convention on Human Rights, human rights are considered fundamental values to be respected and observed by all employees.

The corporate culture of VSMPO TiRus GmbH appreciates and welcomes the fact that every human being is unique and valuable and is to be respected for his or her individual abilities.

Our company does not tolerate any form of discrimination.

These principles also apply to conduct towards external partners.

### **VIII. Confidentiality**

Confidential information, may not be used for personal gain and may not be accessed by a third parties. Company information should always be kept secure (documents, programs, files etc.). In case such information has to be passed outside the company for official reasons, it must be protected. The confidentiality obligation continues even after the employment has been terminated by either of the parties.

Matthias Obermayer (Managing Director)

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