

## WE ARE BUILT ON INTEGRITY

Since 1931, we have stood on a strong moral foundation of acting ethically as people and as a company. How do we do it? Through our commitment and passion to observe the highest standards of ethics and integrity. At Materion, we believe that doing the right thing today leads to doing good business tomorrow.

Materion's Ethics and Compliance Program is integrated into our business operations and daily activities to ensure that all employees world-wide continuously observe our high standards of ethics and integrity and comply with all applicable laws and regulations. Our goal is to make certain that every business decision is guided by our core ethic of "doing the right thing." To demonstrate our commitment to these principles, the Ethics and Compliance program provides:



- A global [Code of Conduct](#) available in 6 languages and accessible to 100% of our employees.
- Ethics and compliance training for employees, senior management and our business partners.
- A "Speaking Up" feedback program focused on encouraging others to speak up and report concerns or suspected violations.
- Ongoing employee assistance, education and best practices for addressing specified areas of risk and handling difficult situations.
- Frequent promotion of an organizational culture that encourages ethical conduct and legal compliance.

The Ethics & Compliance Program is managed under the leadership of the Chief Compliance Officer (CCO). In addition to the Ethics & Compliance Program, the CCO also has direct oversight for other compliance related programs, such as: anti-bribery, antitrust, data privacy, export compliance, conflict minerals and Environmental, Social & Governance (ESG). The CCO oversees a dedicated compliance organization who facilitate the day-to-day ethics and compliance program activities to ensure compliance with all applicable laws and regulations. The CCO provides regular compliance updates to the Audit Committee of the Board of Directors.

### EDUCATION AND TRAINING

Annually, the Materion Code of Conduct, which is available in multiple languages, is distributed to employees including management and senior executives. The principles set forth in this policy and training emphasize the importance of our relevant policies such as, but not limited to, anti-bribery, anti-corruption, accurate and honest reporting, diversity, and inclusion, protecting confidential information, and the importance of reporting concerns. Training is required for all employees and upon completion employees affirm that they will comply with the Code of Conduct and report any known or suspected violations.

In addition to the annual Code of Conduct training, we provide supplementary compliance training courses to targeted employees and managers. In 2022 and 2023, employees averaged three hours of ethics and compliance training on various Code of Conduct topics, such as Export Controls, Global Data Privacy, Financial Integrity, Protecting Confidential Information and Intellectual Property, Conflicts of Interest, Reporting & Retaliation, Ethical Leadership and Ethical Role Modeling.

In 2023, we implemented onboarding and supplementary training for our suppliers to raise awareness on areas such as anti-corruption, bribery, and the importance of ethics. We will continue to work with our suppliers to ensure Materion's anti-corruption policies and standards are being met.

### THE IMPORTANCE OF SPEAKING UP

Our compliance feedback program, Speaking Up, provides all employees, suppliers and business partners with the opportunity to report concerns or suspected violations. Feedback and concerns can be reported internally to company compliance personnel or via the Ethics &

## Ethics and Compliance



Integrity Hotline. The Ethics & Integrity Hotline allows for confidential/anonymous reporting. The Hotline is managed by an independent third party and is available 24 hours a day / seven days a week. Reports can be made via phone or web, and reporting is available in multiple languages. Information for reporting via the Ethics & Integrity Hotline can be found at [www.materion.ethicspoint.com](http://www.materion.ethicspoint.com). The Ethics & Integrity Hotline is accessible to all employees, suppliers and business partners world-wide. Materion strictly prohibits any form of retaliation. We promote and enforce a zero-retaliation policy to provide reassurance in using the hotline.