

A blurred photograph of a crowd of people walking through a modern, brightly lit interior space, possibly a lobby or hallway. The people are out of focus, creating a sense of motion and activity. The background features large glass panels and a polished floor that reflects the light.

THE Morgan Code

WORKING **SAFELY** & **ETHICALLY**

Introduction

Central to the Morgan leadership behaviours is **always working safely & ethically**, and everything we do in Morgan must have this ethos at the core.

The safety of our employees, visitors, customers and communities is vital, as are our ethical standards on how we conduct business. We are measured against the highest standards of ethical practice: we must comply with the letter and spirit of the Morgan Code across our global business and work in a way that makes us proud to be part of Morgan.

The Morgan Code is a set of principles supported by policies and guidelines that lay out how we should conduct ourselves. Our code and accompanying policies do not address every situation or law that may be relevant; instead we must act in the spirit of the Morgan Code and ask ourselves:

- Is this the right thing to do?
- Should I consult others before making a decision?
- How would this look to someone outside of Morgan?

The principles of the Morgan Code fall under four areas:

- Working safely
- Working ethically
- Treating our people fairly
- Protecting our business

Always working safely

Health and safety is fundamental

We believe all fatalities, injuries and occupational illnesses are preventable. Morgan is committed to the goal of all employees, contractors and visitors to our sites going home safe and healthy every day.

We have an objective of zero harm within our organisation and we use our thinkSAFE programme to drive improvements in our safety practices and performance to meet this objective.

We will comply with all relevant health & safety legislation, regulations and other applicable legal requirements as a minimum standard and seek to bring global best practice to each site.

We protect the environment we live in

We are committed to protecting the environment. Morgan includes environmental impact in its business decisions, promotes efficiency programmes and seeks to minimise the environmental impact of its operations and protect the environment of the sites and communities where we operate.

We comply with all relevant environmental legislation, regulations and other applicable legal requirements as a minimum, setting higher standards where appropriate and look to play a positive role where possible.

Always working ethically

We obey the law

Morgan and its employees are subject to the laws, regulations and tax regimes in the multitude of countries around the world in which we operate. Our position is clear: we obey the law everywhere. Four areas of law are specifically noted:

- **Competition law**

We compete in compliance with all applicable competition and anti-trust laws. These laws prohibit business arrangements that restrict free and fair competition.

- **Trade controls**

We comply with trade sanctions and restrictions issued by recognised authorities. Wherever we send Morgan products, services or technical knowledge across a national border, we ensure the export is in compliance with the relevant laws.

- **Tax evasion**

We do not facilitate criminal tax evasion from any party associated with Morgan, including individuals, suppliers and customers.

- **Anti-fraud**

We take reasonable steps to prevent all types of fraud. Our anti-fraud policy applies to all Morgan businesses and employees.

We do not commit bribery or corruption

We do not bribe officials or become involved in corruption. A bribe is giving or receiving anything of value that is intended to confer an improper advantage in the conduct of our business. It includes using an intermediary and includes anything of value, such as cash, gifts, facilitation payments, kickbacks, favours, a job offer, entertainment or other benefits. Corruption includes bribery and extends to fraud, deception, money laundering, cartels and similar acts. Morgan has specific rules relating to gifts & hospitality, donations, sponsorships and dealing with government officials.

We avoid conflicts of interest

We do not put ourselves in positions where competing loyalties may cause us to favour our personal, family or friends interests over those of Morgan. Where a conflict may exist, we ask ourselves who may benefit and how could this be viewed by someone external to our company. If in any doubt, we refer the matter to a manager and remove ourselves from the decision making process.

We trade and compete ethically

We behave ethically in our interactions with suppliers, customers and competitors. With customers and suppliers, we seek to build long term relationships with trust at the centre: this includes being truthful in our communications, and sticking to agreed payment terms. In the marketplace, we advertise, market and sell fairly, not making false statements. We do not read, use or obtain competitive intelligence that we should not have. We seek to ensure our suppliers operate in a responsible way, that their workers are safe and treated fairly and that environmental and social impacts are taken into consideration during the sourcing process. We do not condone any form of slavery, forced or compulsory labour, or human trafficking in our operations.

Treating our people fairly

We believe in equal opportunity employment

We believe that everyone should be employed and promoted solely on the basis of personal merit and contribution. We will not permit discrimination against any person and expect all who work for us and with us to act in a way that is consistent with our sense of fairness and equal opportunity.

We do not tolerate harassment, discrimination or bullying

We are committed to a workplace which is free of harassment, discrimination or bullying in any form and enables our people, and those who work with us or for us, to operate at their maximum potential. We will not tolerate violence or threats of violence at work.

Protecting our business

We protect company property and personal data

We are all responsible for safeguarding and protecting Morgan's property and assets that includes our sites, machinery, computers, intellectual property, information, business opportunities and funds. We are also responsible for the personal data we collect and follow the guiding principles of data protection laws. We safeguard Morgan's future by protecting our confidential information; both information that belongs to Morgan and information we have been entrusted with by others. Special care must be taken in relation to our research & development and manufacturing know-how.

We keep proper business records

The accuracy of our financial records is critical to understanding Morgan's performance and driving improvement. We maintain proper and complete business records and accounts of all of our transactions and ensure that these honestly and fairly reflect our business. We do not alter, destroy, conceal or falsify documents, accounts or records.

We contract responsibly

We conclude contracts in a responsible way, ensuring that we can meet the commitments we sign up to whilst balancing risk and reward. We manage our liability exposure in accordance with Morgan's legal policy.



“Doing business the right way,
safely and ethically,
is fundamental to the way
we do business.

It is the top priority
for Morgan”.

Pete Raby

Chief Executive Officer



Application and questions

The **Morgan Code** applies to all employees of Morgan Advanced Materials plc and its majority-owned subsidiaries as well as consultants, agents and contractors who perform work for us. We expect all employees of joint ventures, sub-contractors and suppliers to uphold similar standards to those set out in the Morgan Code.

If you have questions or a concern of a breach of the Morgan Code, contact your manager, your human resources department, or ethics & compliance - group.compliance@morganplc.com

Retaliation against any employee who in good faith reports a suspected violation will not be tolerated.

If you are concerned about confidentiality, please address the issue through the **Morgan ethics & compliance hotline** - <https://morgan.integrityline.app> or via locally available phone numbers.

www.morganadvancedmaterials.com/themorgancode

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