

# Human Rights Policy

CMC Materials, Inc. ("CMC") is committed to treating people with dignity, fairness and respect as a fundamental aspect of our Vision and Values, as articulated in our Code of Business Conduct ("CBC"). As part of this, CMC supports recognized standards for social responsibility and the prevention of human rights abuses. Through the CBC and this Human Rights Policy ("HRP"), we are committed to conducting our business activities in a manner that exhibits our commitment to human rights and social responsibility.

All CMC employees are expected to understand, exhibit and promote the principles described in this HRP in their work activities. CMC's leaders are expected to incorporate these principles into decision-making such that organizational processes are used to identify, monitor and manage human rights matters accordingly.

To underscore our commitment to human rights and social responsibility, CMC requires its suppliers, vendors and contractors to certify or contractually agree to abide by laws, rules and regulations in effect in the places in which they do business. We also require suppliers, vendors and contractors to agree to this HRP or demonstrate a comparable commitment to its principles through their own policies. These commitments are reflected in our Supplier Handbook, to which suppliers to CMC must agree.

## **Prohibition on Child Labor, Forced Labor and Human Trafficking**

CMC does not directly or indirectly use or support the use of child labor. We do not hire children under the legal age for employment in any location in which we operate, and we prohibit employees under the age of 18 from engaging in or performing work that involves significant risks to their health or safety. CMC is opposed to forced labor, indentured labor, involuntary prison labor, slavery and any other form of labor that is against a person's free will. We forbid this activity in our own operations and will not tolerate it among our suppliers, vendors, contractors or partners.

## **Conflict Minerals and Supplier Responsibility**

CMC does not use Conflict Minerals (i.e., gold, tantalum, tin, tungsten) in its operations. We are committed to sourcing raw materials from suppliers that share our values around social responsibility and human rights. CMC requires that our suppliers of raw materials maintain documentation that they reject the purchase or use of, or support for, Conflict Minerals.

## **Diversity, Equal Opportunity and Harassment**

As stated in our CBC and expressed through our Diversity, Inclusion and Belonging program, CMC supports, encourages and values a diverse and inclusive workforce and fosters a working environment that reflects such. We support equal opportunity and strive to reflect the diversity of the communities in which we operate. We invest in local talent pools, employ local workers and provide training to improve skill levels where appropriate, in cooperation with our employees, and in relevant places, with worker representatives and governmental authorities. We also strive to create a sense of belonging among our employees, valuing them not only for their professional abilities but also for who they are and their contribution to the CMC community.

CMC strives to maintain a healthy, safe and productive work environment that is free from discrimination or harassment based on race, color, religion, sex, sexual orientation, age, national origin, disability, genetic information or other factors that are unrelated to CMC's legitimate business interests. Harassment and discrimination do not require the "intent to offend." Inappropriate conduct meant as a joke, a prank or even a compliment can lead or contribute to harassment. To that end, CMC will not tolerate sexual advances, actions or comments or racial or religious slurs, jokes or any other comments or conduct in the workplace that creates, encourages or permits an offensive, intimidating or inappropriate work environment. These provisions apply to interactions with employees, customers, contractors, suppliers and applicants for employment and any other interactions.

## **Freedom of Association and Collective Bargaining**

Some of our employees may be represented by officially designated third parties or elected employee representatives, such as trade unions, works councils or other collective bargaining units, as provided by local laws and regulations. CMC respects employees' freedom of association and right to bargain collectively, and we comply with applicable laws and regulations in the countries and communities in which we operate. We also support the rights of workers who choose not to participate in these forms of association, and we expect our employees with differing perspectives to engage each other with a sense of accommodation, dignity and respect as provided in the CBC and related policies.

## **Environmental, Health and Safety**

As expressed in our Environmental, Health and Safety Policy and the CBC, CMC is committed to conducting its operations worldwide in a safe and responsible manner that respects the environment and protects the health and safety of our employees, our contractors, our customers and the communities in which we operate.

## **Working Hours and Wage Standards**

CMC provides compensation and benefits that are market-based and compliant with applicable laws and regulations. We have established competitive pay levels that are based on job descriptions and independent of gender, age, ethnicity or other personal characteristics or beliefs. CMC provides employees with working hours and schedules that encourage a healthy work/life balance and the retention and support of our talent. We also encourage the continued professional development of our employees through multiple educational, training, apprenticeship and internship programs.

## **Policy Administration and Complaint Management**

CMC's Office of the General Counsel and the Corporate Secretary has overall responsibility for the administration of this HRP. Any employee or manager who becomes aware of non-compliance with this HRP should report such through established channels, as provided in the CBC, which include any CMC manager, the CMC Human Resources department or CMC's Chief Compliance Officer or General Counsel. Reporting of concerns and violations may be done anonymously, and no retaliatory actions will be taken against any employee who makes such a report in good faith or cooperates in an investigation of an alleged violation. Managers are required to report and address violations of this HRP.

**People matter to us, and we at CMC are committed to articulating these values and incorporating them into all that we do.**



David Li  
President and Chief Executive Officer