



## **Ampco-Pittsburgh Corporation**

### **SUPPLIER CODE OF CONDUCT**

Corporate integrity, fair and ethical business practices, responsible product sourcing, and the safety and well-being of workers across its global supply chain are of paramount importance to Ampco-Pittsburgh Corporation (together with its direct and indirect subsidiaries, “Ampco” or the “Company”). These principles are set forth in a variety of corporate governance documents of the Company, including its Code of Business Conduct and Ethics, Corporate Governance Guidelines and Conflict Minerals Policy, and they apply to all aspects of Ampco’s business. Accordingly, we expect that all manufacturers, distributors, vendors and other suppliers (each a “Supplier” and, collectively, “Suppliers”) that source and supply products, components or services to Ampco to adhere to the same principles set forth in these policies and as summarized in this Supplier Code of Conduct (this “Code”).

#### **Ethics Generally**

The Company expects all Suppliers to compete fairly, honestly and in a manner that does not engage in unethical or illegal business practices. Suppliers should comply with all applicable laws relating to the operation of their businesses; the treatment, health and safety of workers; the impact on the local and broader environment, including through the operation of facilities and in sourcing of components and inputs; and in their broader interactions with other constituencies or stakeholders.

#### **Safeguarding Proprietary and Confidential Information**

Ampco expects Suppliers to protect and use only as appropriate or permitted confidential information that belongs to the Company or other persons or parties. Ampco expects Suppliers to comply with all laws and regulations regarding managing, handling, and disseminating proprietary and confidential information.

Ampco also expects Suppliers to protect the Company’s information against unauthorized access, loss, damage, theft, and misuse, and to only use it in a manner that is permitted under our contract. This information includes trade secrets, copyrights, and trademarks, and any other company data accessible to the supplier.

#### **Supplier Obligations**

- Suppliers must not use, share, or discuss another company’s proprietary or competitively sensitive information unless they have proper authorization. If a Supplier receives any Company information relating to competitors, customers, or former employers, they must promptly report it to [supplierscode@ampcopgh.com](mailto:supplierscode@ampcopgh.com).
- Suppliers must properly handle sensitive information, including confidential, proprietary, and personal information, and use such information only for the business purpose for which it was provided unless authorized by Ampco.
- Suppliers must comply with all applicable data privacy and data protection laws and regulations.

- Suppliers must respect and comply with all laws governing intellectual property rights, including patents, copyrights, trademarks, and protections against unauthorized disclosure.
- Suppliers must never use material, non-public information obtained in the course of business on behalf of the Company as the basis for trading securities or enabling others to trade securities.
- Suppliers must maintain information security programs designed to mitigate cybersecurity risks and protect information systems from unauthorized access, destruction, use, modification, or disclosure.
- **Reporting:** Suppliers are expected to report to [supplierscode@ampcopgh.com](mailto:supplierscode@ampcopgh.com) in the event of the following circumstances in the course of conducting business on behalf of the Company:
  - When a Supplier inadvertently or otherwise obtains access to another company's proprietary information, competitively sensitive information, or customer source selection data;
  - If a Supplier receives proprietary information belonging to another company without clear authorization, the employees of the company must not read, use, share, copy, or distribute the information. The employee with such information must secure the information and promptly report it; and
  - If a Supplier knows suspected unauthorized use of information assets, unauthorized access to systems, or compromise of data or information systems.

### **Accurate Records**

Suppliers are expected to be honest and transparent and to create and maintain complete and accurate records for all business processes, including timekeeping, accounting, trade, compliance documentation, and invoicing. All records must fully and accurately represent the transaction or event being documented. Suppliers must not alter any record to conceal or misrepresent the underlying event or action. The Suppliers must comply with the record retention policies outlined in the governing terms and conditions document.

### **Antitrust**

Suppliers are expected to conduct competition fairly and ensure that their services and products are selected based on merit. Competition among Suppliers or potential Suppliers must be based on legal and ethical business practices.

- Suppliers must comply with competition and antitrust laws.
- Suppliers must never make agreements with competitors to fix prices, rig bids, allocate customers or markets, or exchange any pricing information.
- Suppliers must never use the exchange of business gifts and hospitality to gain an unfair competitive advantage.

## **Anti-Corruption**

Ampco expects Suppliers to comply with applicable anti-corruption laws to prevent, detect, and report bribery, extortion, and undue influence on individuals in public and private sectors. Applicable anti-corruption statutes include the United States Foreign Corrupt Practices Act, and the U.K. Bribery Act of 2010, 18 U.S.C. § 201 (US domestic bribery) and all other anti-corruption or anti-bribery laws applicable to their business. These laws address bribes and facilitation payments. A bribe is anything of value, such as money, lavish meals, gifts, travel expenses, entertainment, offers of employment (including paid or unpaid internships), political donations, or charitable contributions that may be seen as an attempt to obtain improper advantage for our company. Facilitation payments, sometimes referred to as “grease” payments, are generally small payments, usually made in cash, that are provided to a government official to speed up the performance of a routine action that the official is already obligated to perform, like processing permits.

### **Supplier Obligations**

Suppliers are expected to abide by the anti-corruption rules set out in this Code, and any violations are subject to disciplinary action. See “Remedy Rights and Termination” below. Suppliers are expected to adhere to the following guidelines:

1. Never offer, accept, promise, give, or authorize any sort of bribe or kickback or provide other improper favors or things of value, directly or indirectly, in connection with our or foreign government or commercial business;
2. Never offer facilitation payments;
3. Never request, direct, or knowingly allow a trading partner to do something for the Company that the Company ethically or legally cannot itself;
4. Take appropriate measures to confirm that contracts, business and expense records with which you are involved accurately reflect the true nature and value of the transaction and the relationship of the parties involved and that accurate books and records are maintained; and
5. Promptly report potential or suspected policy or procedural violations of this Code, as well as unethical or illegal activity, to Daniel Litwin, Corporate Counsel and Corporate Secretary, email: [dlitwin@ampcopgh.com](mailto:dlitwin@ampcopgh.com) or phone: 412-429-2487.

## **Human Rights**

Ampco is committed to upholding fundamental human rights and believes that all people should be treated with dignity, fairness and respect. As discussed in greater detail below, the Company expects all Suppliers to comply with all applicable laws related to the prohibition and prevention of slavery, human trafficking and unlawful child labor; freedom of association and collective bargaining; promotion of workplace safety and security; rights of workers with respect to hours, compensation, and benefits.

## Supplier Obligations

Supplier must share Ampco's commitment to upholding the human rights of all workers and to conducting their operations in a lawful, ethical, and responsible manner. As such, the suppliers are expected to uphold human rights commitments through the following actions:

- Suppliers should implement and maintain reliable systems to verify and record the eligibility of all workers, including age and legal status of foreign workers;
- Ensure all employment is freely chosen and prohibiting all forms of modern slavery, forced labor, and human trafficking;
- Prohibit the use of child labor and comply with applicable minimum-age laws and regulations;
- Comply with all applicable labor and employment laws, including those relating to wages, benefits, and working hours;
- Respect workers' rights to freedom of association, collective bargaining, and peaceful assembly, and to refrain from such activities consistent with applicable law; and
- Respect and protect the human rights of workers and others affected by their business activities.

Additionally, suppliers are expected to follow the below-outlined conduct prohibiting modern slavery and human trafficking the following ways:

- Suppliers must never destroy, conceal, confiscate, or otherwise deny access to employee identity or immigration documents;
- Suppliers must never use recruiters that fail to comply with applicable labor laws;
- Suppliers must never engage in misleading or fraudulent recruitment practices;
- Suppliers must never charge prohibited recruitment fees or provide housing that fails to meet applicable legal requirements or local standards;
- Suppliers must never fail to provide employees with employment documentation in a language they understand;
- Suppliers must to provide required return transportation for covered employees; and
- Suppliers must investigate and protect employees reasonably believed to be victims of human trafficking.

Suppliers should educate their employees on prohibited trafficking activities, take appropriate disciplinary action when violations occur, and promptly report violations and corrective actions as required by applicable law or contract requirements.

### **Working Conditions**

The Company expects all Suppliers to provide fair working conditions, including fair wages and reasonable working hours compliant with applicable legal requirements. Suppliers should provide a safe, healthy, and sanitary working environment, including adequate and appropriate personal protective equipment to shield workers against hazards typically encountered in the scope of work; education or training related to minimizing and responding to workplace accidents, injuries, fires, natural disasters, and other emergencies; and facilities meeting all applicable building codes and legal construction requirements.

#### **Supplier Obligations**

- Suppliers should ensure that workers have the right to freedom of movement and to terminate employment, in each case without delay or hindrance and otherwise without the threat or imposition of any discipline, penalty, retaliation, fine or other monetary obligation.
- Suppliers must maintain safe, healthy, and humane working conditions at all locations.
- Suppliers must comply with all applicable environmental, health, and safety laws, regulations, and directives.
- Suppliers must maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances.

### **Discrimination**

The Company expects Suppliers to treat all people in the workforce equally regardless of race, color, religion, age, sex, national origin, disability, sexual orientation, gender identity, gender expression, military status, marital or pregnancy status or any other characteristic other than the worker's ability to perform the applicable job.

#### **Supplier Obligations**

Suppliers should not engage in illegal discrimination in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice on such bases. Ampco expects Suppliers to prohibit unlawful discrimination, harassment and retaliation in the workplace.

### **Conflicts of Interest**

The Company expects all Suppliers to conduct business with integrity and to avoid situations in which personal interests, relationships, or outside activities could improperly influence, or appear to influence, business decisions. Suppliers must promptly disclose actual,

potential, or perceived conflicts of interest so that they can be appropriately reviewed and addressed.

#### Supplier Obligations

- Suppliers must avoid all situations that create, or appear to create, a conflict of interest and make decisions free from improper personal, financial, or other outside influences.
- Suppliers must avoid offering Company personnel gifts, entertainment, hospitality, favors, or other benefits that are excessive, inappropriate, or otherwise inconsistent with applicable laws.
- Suppliers must ensure that personal relationships, financial interests, or outside business activities do not improperly influence business decisions involving the Company.
- Suppliers must promptly disclose any actual, potential, or perceived conflict of interest to all affected parties so that appropriate measures can be taken to evaluate and resolve the conflict at [supplierscode@ampcopgh.com](mailto:supplierscode@ampcopgh.com).

#### Global Trade

The Company expects all Suppliers to comply with applicable international trade, security, and financial integrity laws and regulations. Suppliers must conduct business in a manner that supports lawful trade practices, protects supply chain security, and prevents involvement in prohibited transactions, boycotts, or money laundering activities.

#### Supplier Obligations

- Imports and Exports. Suppliers must comply with the laws, directives and regulations that govern international trade, including those that govern the import and export of parts, components, and technical data such as the International Traffic in Arms Regulation and the Export Administration Regulations. Suppliers shall provide truthful and accurate information and obtain export licenses and/or consents where necessary.
- Anti-Boycott. Suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott or restrictive trade practice, in accordance with the Export Control Reform Act of 2018 and the 1976 Tax Reform Act.
- Anti-Money Laundering. Suppliers must comply with anti-money laundering laws and regulations. Suppliers must not engage with any entity or in any activity that would involve Ampco in money-laundering schemes.
- Security. When applicable, Suppliers should implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism Initiative of the United States.

## **Responsible Sourcing**

Ampco expects Suppliers to engage in responsible sourcing practices, including applicable rules and regulations related to the sourcing of conflict minerals and similar substances.

### **Supplier Obligation**

Suppliers are expected to support responsible sourcing of conflict minerals in the following ways:

- Suppliers must conduct due diligence on the source and chain of custody of any conflict minerals contained in their products; and
- Suppliers must support efforts to eradicate the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries.

## **Environmental Protection**

The Company expects all Suppliers to operate their businesses and facilities in compliance with applicable environmental laws, including laws relating to waste disposal, emissions, discharges and hazardous and toxic material handling.

### **Supplier Obligations**

- Suppliers must operate in a manner that actively manages risk, minimizes waste, and protects the environment.
- Suppliers must apply a systematic approach to identifying and managing environmental risks, hazards, and opportunities, including risks associated with regulatory non-compliance, reputational harm, and opportunities for business growth through operational and product stewardship.
- Suppliers should strive for continuous improvement in their environmental stewardship and management systems.
- Suppliers should investigate alternative options for the reduction, reuse and/or recycling of material to reduce the amount of waste and pollution they create.
- Suppliers must minimize the impact of their operations or activities in a manner that preserves natural resources and reduces pollution.

## **Product Quality**

The Company expects all Suppliers to maintain appropriate quality assurance processes designed to ensure that products and services consistently meet contractual, regulatory, and performance requirements. Suppliers are also expected to implement controls to prevent, detect, and address defects and counterfeit products within their supply chains.

### Supplier Obligations

- Suppliers must maintain effective quality management processes designed to identify defects, implement corrective actions, and ensure that products and services meet or exceed applicable contractual requirements.
- Suppliers must promptly investigate quality issues and take appropriate corrective and preventive actions to prevent recurrence.
- Suppliers must implement controls designed to minimize the risk of counterfeit parts, components, materials, or products entering their supply chains or deliverable products.

### **Working with the Federal Government Contracts**

In addition to the conduct and expectations outlined above, suppliers may be subject to additional ethical, compliance, and business conduct requirements arising from U.S. Government contracts. The Federal Acquisition Regulation (“FAR”), along with agency-specific supplements, establishes contractual obligations that government contractors and their suppliers may be required to follow as a condition of contract performance. Certain requirements may be flowed down from prime contractors to subcontractors and suppliers through contractual provisions. Where such flowdown requirements apply, suppliers are expected to comply with all applicable obligations. Suppliers are also expected, when applicable, to comply with domestic sourcing and procurement requirements, including those relating to the Buy American Act, specialty metals restrictions, and other federally mandated purchasing preferences.

### Supplier Obligations

- Suppliers are obligated to maintain all documentation and verification for domestic sourcing and provide it to Ampco for verification upon request.
- Suppliers are expected to make their employees, facilities, products, and documents accessible for an audit with Ampco or the federal government, where such obligations apply.
- Suppliers must follow all applicable U.S. Government rules and requirements for fair and open competition.
- Suppliers must honor restrictions applicable to U.S. Government employees, including those related to gifts, gratuities, hospitality, and employment discussions.
- Suppliers must deliver products and services that conform to applicable contract requirements, specifications, laws, and regulations.
- Suppliers must adhere to all applicable government accounting, cost, pricing, and billing requirements.
- Suppliers must ensure the accuracy, completeness, and timeliness of data, records,



certifications, and other information submitted in connection with government contracts.

- Suppliers must comply with all other applicable U.S. Government contractual, legal, and regulatory requirements.
- Suppliers must promptly report any suspected violations of applicable laws, regulations, contract requirements, or this Code to Daniel Litwin, Corporate Counsel and Corporate Secretary, email: [dlitwin@ampcopgh.com](mailto:dlitwin@ampcopgh.com) or phone: 412-429-2487.

### **Reporting Violations**

The Company expects Suppliers and their workers to self-report any violations of this Code. Ampco's reporting avenue is Daniel Litwin, Corporate Counsel and Corporate Secretary, email: [dlitwin@ampcopgh.com](mailto:dlitwin@ampcopgh.com) or phone: 412-429-2487.

### **Retaliation**

Suppliers must not retaliate or take disciplinary action against any worker who, in good faith, reports violations or questionable behavior applicable to this Code, or who otherwise seeks advice regarding this Code. Failure to follow this principle may result in up to contract termination with suppliers.

### **Remedy Rights and Termination**

Subject to restrictions under applicable law or other contractual rights, Ampco reserves the right to terminate its business relationship with a Supplier immediately if such Supplier fails to meet the standards and/or principles set forth herein. Additionally, Ampco may be required to report certain violations to authorities.

*The Company reserves the right to amend this Code at any time. Nothing herein says or implies that a contract exists between the Company, on the one hand, and any Supplier or other third party, on the other hand. Nothing in this Code implies that a contract exists between the Company and any other party or that a party's compliance with this Code is a guarantee of continued employment, contract or other business relationship with the Company.*

Adopted: August 4, 2026