

GLOBAL STANDARDS FOR
BUSINESS CONDUCT



COORSTEK

CONTENTS

| | | | |
|--|-----------|---|-----------|
| Letter from our Co-CEOs | 3 | OUR COMMITMENT TO INTEGRITY..... | 23 |
| The CoorsTek Way | 4 | Controllership | 24 |
| Understanding Our Global Standards For Business Conduct | 5 | Accurate Business and Financial Records | 24 |
| Your Responsibilities..... | 5 | Statements on Behalf of CoorsTek..... | 25 |
| Share Your Concern | 5 | Conflicts of Interest..... | 26 |
| OUR COMMITMENT TO DIGNITY AND RESPECT..... | 7 | Gifts and Entertainment | 27 |
| Respect For Our Colleagues..... | 8 | Relationships with Vendors..... | 27 |
| Diversity, Inclusion, and Non-Discrimination | 8 | Insider Trading | 28 |
| Anti-Harassment and Anti-Retaliation | 9 | International Trade and Customs | 29 |
| Human Rights | 9 | Fair Competition..... | 30 |
| Health and Safety | 10 | Antitrust | 30 |
| Safe Working Environment | 10 | Competitive Intelligence | 31 |
| Substance Abuse..... | 11 | Truth in Sales and Marketing | 31 |
| Workplace Violence | 11 | Anti-Corruption and Anti-Bribery | 32 |
| Privacy and Personal Data Protection..... | 12 | Government Officials..... | 32 |
| OUR COMMITMENT TO STEWARDSHIP | 15 | Commercial Bribery and Kickbacks | 33 |
| Environment | 16 | Working with Governments..... | 34 |
| Quality | 17 | Government Contracting | 34 |
| Confidential Information and Intellectual Property..... | 18 | Lobbying..... | 34 |
| Company Assets | 20 | Political Activities and Contributions..... | 34 |
| | | Helpful Resources..... | 35 |

LETTER FROM OUR CO-CEOS

Dear Team Members,

For more than a century, CoorsTek has consistently proven to be an innovative company with a passion to make the world measurably better. We have collaborated to deliver engineered solutions with outstanding value to our customers by leveraging our expertise in materials science and deploying best-in-class research and development along with manufacturing capabilities.

We also pride ourselves by remaining steadfast and committed to lawful business practices. When we face difficult decisions in the workplace, we make integrity, stewardship, and respect our highest priority and we expect our employees, vendors, customers, and other business partners to think and act in the same way.

Our Global Standards for Business Conduct reflect our commitment to conducting business the right way – respectfully, with integrity, and in full compliance with the law. Our Global Standards also provide you with the tools and guidance necessary to make sound business decisions. We expect that you will read our Global Standards thoughtfully and follow them every day.

We are committed to upholding our Global Standards for Business Conduct, and we expect that same commitment from you. By staying true to who we are and how we have done business from generation to generation, together by following our Global Standards, we will continue the path toward achieving our success the right way for many more years to come.

Jonathan Coors, Michael Coors, and Timothy Coors | CoorsTek Co-CEOs



THE COORSTEK WAY

At CoorsTek, we have a set of principles that guide how we treat our business partners, our employees, and the world around us.

From the products we make to the people we employ, **The CoorsTek Way** is fundamental to the way we do business.



THE COORSTEK WAY

Vision Statement | **We make the world measurably better.**



BETTER TODAY

- **We are inspired** by our legacy of innovation
- **We take pride** in what we do
- **We provide** outstanding value for our customers, teammates, families, communities and world
- **We deliver** leading-edge solutions to improve the lives of people in the communities in which we serve



BETTER TOGETHER

- **We value** the inherent worth and dignity of every individual
- **We share** responsibility, risk, opportunity and reward
- **We collaborate** to solve our customers' most complex challenges
- **We act** with consistency, honesty and respect



BETTER TOMORROW

- **We push** the limits of what's possible
- **We evolve** to meet the challenges of the future
- **We think** globally and act locally
- **We commit** to near-term results with a long-term view

UNDERSTANDING OUR GLOBAL STANDARDS FOR BUSINESS CONDUCT

Our CoorsTek Global Standards for Business Conduct (our Global Standards) is a reflection of The CoorsTek Way and helps us operate openly, honestly, and lawfully. We count on every employee, at every level of every CoorsTek company, to live by The CoorsTek Way, follow our Global Standards, and make decisions that will preserve the trust others have placed in us.

YOUR RESPONSIBILITIES

We are each personally accountable for understanding and living by The CoorsTek Way and for complying with our Global Standards, all CoorsTek policies, and all laws and regulations wherever we do business. Even the smallest instance of misconduct can damage our reputation, our company, our customers, or our communities.

CoorsTek counts on you to:

- Live by The CoorsTek Way and encourage fellow employees to do the same
- Understand and consult our Global Standards and use it to help you make sound decisions
- Comply with our Global Standards, our policies, and all laws and regulations
- Seek guidance from CoorsTek internal resources when you are unsure about the proper course of action
- Report any suspected violations or concerns

Living by The CoorsTek Way and following our Global Standards will serve you well in all situations that you may face. Although The CoorsTek Way and our Global Standards cannot describe every situation you may face, they provide guidance and tools for you to refer to when making all decisions, communications, and actions. It's important to use common sense and good judgment in everything you do and to ask for help if you are unsure about the right course of action.

CoorsTek also counts on our managers and supervisors to lead by example and to create a work environment where employees feel comfortable raising questions or concerns.

Be aware that anyone who violates The CoorsTek Way, our Global Standards, our policies, or any law or regulation may face corrective or disciplinary action, up to and including termination of employment with CoorsTek.

SHARE YOUR CONCERN

SHARE YOUR CONCERN

An essential part of living by The CoorsTek Way and operating with high integrity is responding when our Global Standards, our policies, or a law or regulation may have been violated. When you suspect misconduct, it is imperative that you speak up and **Share Your Concern**.

There are many ways to speak up and **Share Your Concern**. You can:

- Inform your supervisor or a higher-level manager
- Report it to another internal resource, such as the Human Resources Department, the EHS Department, or the Legal Department
- Write the CoorsTek Co-CEOs directly at ShareYourConcern@CoorsTek.com
- If you are located in North America or Asia, contact the CoorsTek **Share Your Concern** Line at
 - Phone: **+1 800 461 9330**
 - Text: **+1 720 730 3215**
 - Online: shareyourconcern.coorstek.com

ZERO TOLERANCE FOR RETALIATION

We recognize that speaking up isn't always easy, and we want to make the decision to **Share Your Concern** as simple as possible. Regardless of who you contact, you can be confident that you are doing the right thing and that your concern will be handled promptly and appropriately.

CoorsTek will not tolerate any form of retaliation or intimidation against anyone who in good faith reports a suspected instance of misconduct or a violation of The CoorsTek Way, our Global Standards, our policies, or a law or regulation. Any person who is found to have retaliated against someone who in good faith raises a concern or cooperates in an investigation may be subject to corrective or disciplinary action, up to and including termination of employment with CoorsTek.





OUR COMMITMENT TO
DIGNITY AND RESPECT

RESPECT FOR OUR COLLEAGUES

We treat our colleagues with dignity and respect.

OUR COMMITMENT

Through The CoorsTek Way, we value the inherent worth and dignity of every individual. Our success can be achieved only when we treat everyone with respect. Respect in the workplace, along with individual excellence and collaborative teamwork, is how we accomplish our goals.

OUR EXPECTATIONS

DIVERSITY, INCLUSION, AND NON-DISCRIMINATION

We are committed to fostering an inclusive and respectful workplace where diverse views are valued. We recognize that a diverse mix of backgrounds, talents, and experiences drives innovation and allows us to meet the needs of our global customer base.

We continually ensure equal opportunities in employment. We never base employment decisions, including recruiting, hiring, training, salary, or promotion, on legally protected characteristics under applicable law, such as race, color, gender, age, national origin, religion, sexual orientation, gender identity or expression, marital status, citizenship, disability, pregnancy, genetic information, veteran status, political affiliation, or union membership.

What If?

Q: I applied for a position in another department but learned it was offered to a less qualified candidate. I think the reason was because the hiring manager knew that I am a disabled veteran. What should I do?

A: We require that employment decisions be based on objective, relevant criteria, such as your qualifications and abilities, not your status as a disabled veteran. If you suspect that you were discriminated against, you should raise the issue and **Share Your Concern**.



ANTI-HARASSMENT AND ANTI-RETALIATION

We strive to provide a work environment free from harassment where all persons are treated with dignity and respect. We do not tolerate any behavior that creates an offensive, intimidating, humiliating, or hostile work environment that interferes with another person's work performance. Harassing behavior may include mental, physical, or verbal abuse, unwelcome sexual advances or remarks, offensive jokes, or derogatory comments.

We also do not tolerate retaliation against any person who reports harassing behavior in good faith. Never shall an employee be demoted, dismissed, have his or her pay reduced, or given a negative evaluation because he or she made a complaint about harassing behavior.

What If?

Q: A colleague in my area is constantly teased about his religious beliefs. It's his problem really, so do I need to do anything?

A: We all work as part of a team and it's important that we look out for one another. Harassment of any kind is unacceptable. You should raise the issue confidentially with your supervisor or **Share Your Concern**.

HUMAN RIGHTS

We respect the fundamental human rights and dignity of all people in our operations and supply chain by:

- Forbidding the use of child labor and forced labor and not tolerating any form of exploitation of children, human trafficking, physical punishment, or involuntary servitude
- Following all applicable laws for conditions of employment, including maximum hours and overtime and minimum wage and benefits
- Respecting each employee's right under applicable law to freedom of association, to collective bargaining, and to choose to join or not join a trade union
- Providing humane, safe, and secure working conditions.

We expect our suppliers and business partners to uphold these principles, as well.

What If?

Q: I saw a news article that says one of our contractors has been known to use child labor. I'm not involved in the work of this contractor, and I assume my coworkers who manage this contractor have already addressed this. Is there anything I should do?

A: You should **Share Your Concern**. Working with business partners that have a history of human rights abuses is against The CoorsTek Way and puts our company at risk.

Additional Resources

[CoorsTek Supplier Code of Conduct](#)

[CoorsTek Modern Slavery Transparency Statement](#)

HEALTH AND SAFETY

We safeguard the health and safety of our employees and those who work with us.

OUR COMMITMENT

We are committed to providing a safe, healthy, and secure environment for our employees, contractors, business partners, customers, vendors, and visitors wherever they are working.

OUR EXPECTATIONS

SAFE WORKING ENVIRONMENT

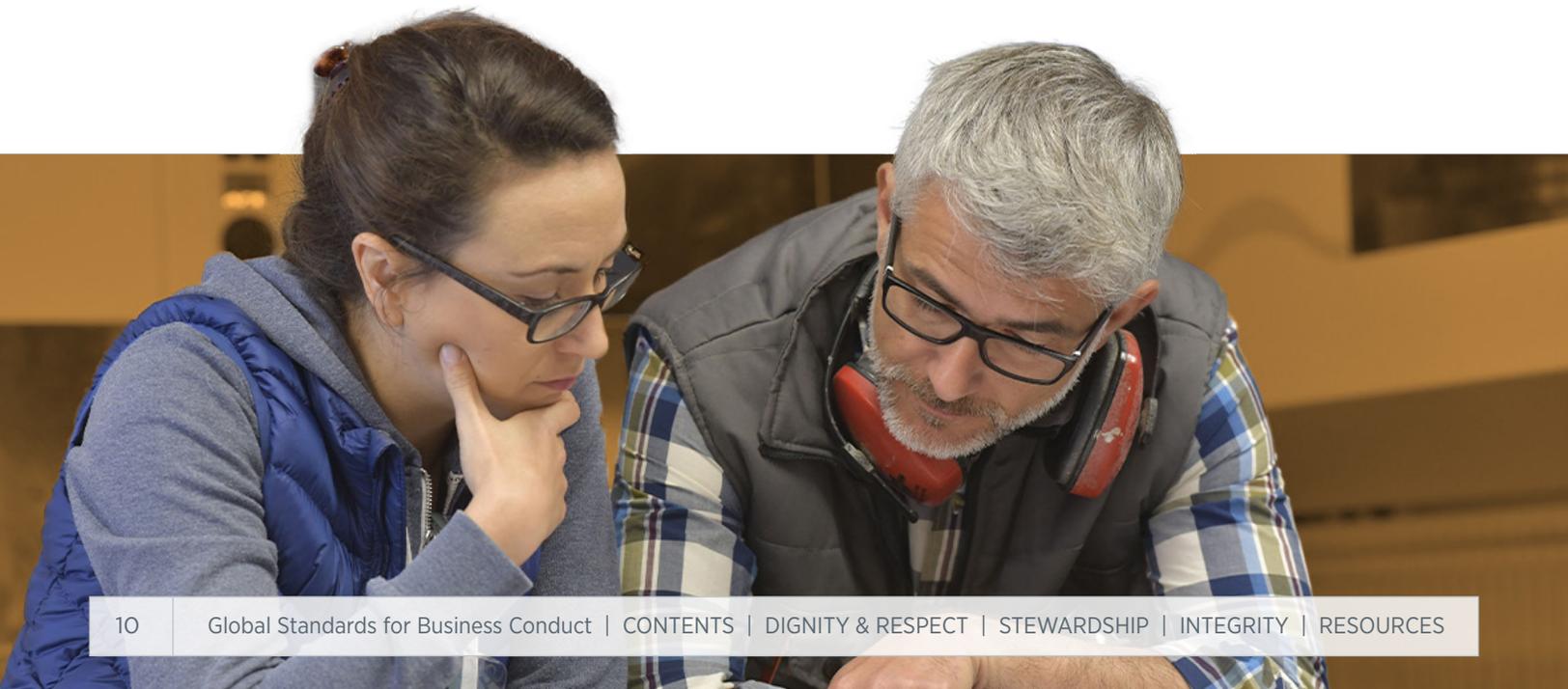
Every employee is responsible for making health, safety, and security a priority. You should always speak up and **Share Your Concern** if you:

- Are asked to perform a task that you consider unsafe, are not properly trained to perform, or think may harm you or others
- See or suspect any condition or situation that may pose a safety risk or a potential danger to yourself or others

What If?

Q: Senior management is always talking about safety first, but my supervisor wants us to break safety procedures so that we can meet our production targets. What should I do?

A: Safety procedures should never be compromised. Putting production ahead of safety is inconsistent with The CoorsTek Way. Consider discussing your concerns with your supervisor, or if you feel uncomfortable about this, then you should speak up and **Share Your Concern**.



SUBSTANCE ABUSE

Employees that work under the influence of drugs or alcohol pose an unacceptable safety risk to themselves and others with whom they work. You are expected to perform your job duties free from the influence of any substance that could impair your job performance. You must:

- Never use or possess marijuana (including lawfully prescribed marijuana), illegal drugs, or controlled substances while working or while on CoorsTek premises
- Never use alcohol, lawfully prescribed medication (including marijuana), or over-the-counter drugs in a way that might harm your ability to perform your job duties safely and successfully
- Never sell, give, or distribute illegal drugs, marijuana, controlled substances, or drugs that have been prescribed to you while working or while on CoorsTek premises

What If?

Q: My job involves driving a forklift. I'm currently taking prescribed medication for depression, which has a side effect that may make me drowsy. I'm embarrassed to tell my boss about my condition, and so far I feel fine. Do I really need to inform my supervisor?

A: Yes. You do need to inform your supervisor or Human Resources representative. We care about your safety and the safety of your team members. It is paramount that your abilities are not impaired while operating equipment. We will protect your privacy and the privacy of your medical information.

WORKPLACE VIOLENCE

We require zero-tolerance when it comes to acts or threats of violence in our workplace. You must:

- Never bring or permit weapons of any kind in our buildings
- Never engage in or tolerate any act that may make another person feel threatened, unsafe or fearful, including verbal assaults, threats, or expressions of hostility, intimidation or aggression
- **Share Your Concern** if you know or suspect incidents of violence, believe someone is in danger, or suspect someone may have a weapon in one of our buildings

What If?

Q: My manager often loses his temper and aggressively yells at my coworkers and me. Is this workplace violence?

A: It depends, but regardless, the situation creates a negative work environment. You should **Share Your Concern**.

Additional Resources

Visit the [Global EHS page](#) on the CoorsTek Intranet to find CoorsTek standards related to substance abuse, promoting a safe working environment, and safeguarding the health and safety of all persons.

PRIVACY AND PERSONAL DATA PROTECTION

We respect the privacy of all individuals.

OUR COMMITMENT

We respect the privacy of our coworkers and others with whom we conduct business, and we handle their personal information with care. “Personal information” is any information that could be used to identify someone, either directly or indirectly.

Most countries have data privacy laws that prescribe how to responsibly collect, store, use, share, transfer and dispose of personal information, and we strive to comply with those laws everywhere they apply to us.

OUR EXPECTATIONS

You are expected to:

- Follow our data protection policies and protect any personal information that is entrusted to you
- Not collect, access, use, retain or disclose anyone’s personal information, except pursuant to relevant and appropriate business purposes
- Not share anyone’s personal information with anyone, either inside or outside CoorsTek, who does not have a legitimate business need to know it
- Take steps to properly secure personal information from unauthorized access

What If?

Q: CoorsTek offers a discounted gym membership to its employees. The gym would like to send an invitation to all employees who have not signed up for a membership. This invitation would include marketing information about the gym and how to sign up. The gym asked me to provide a list of my coworkers’ names and address. Is it okay to provide this?

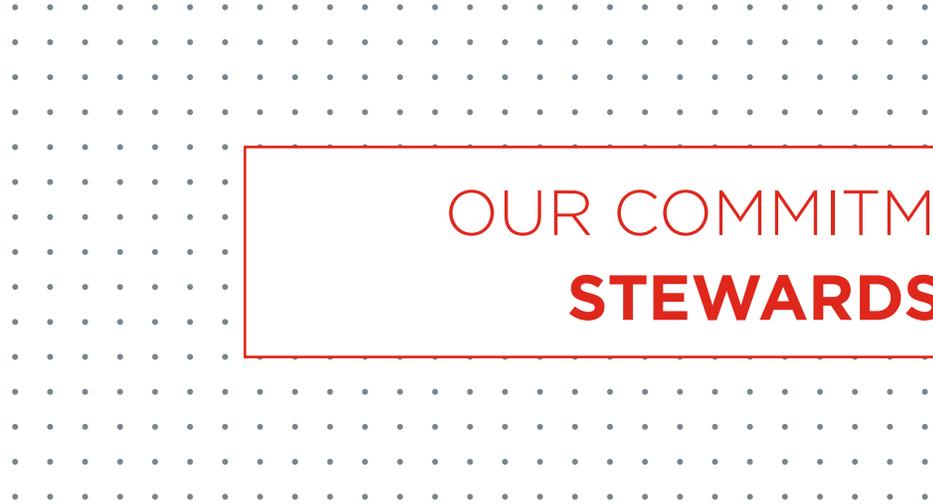
A: It depends, and so before doing anything, contact the CoorsTek Legal Department for guidance. Even if the gym has good intentions and your coworkers may want to receive this marketing information, giving your coworkers’ personal information to the gym may violate our commitment to keep their personal information private.

Additional Resources

Visit the [Privacy & Data Protection page](#) on the CoorsTek Intranet to find global policies and procedures related to privacy and personal data protection.







OUR COMMITMENT TO
STEWARDSHIP

ENVIRONMENT

We protect the environment and natural resources we are privileged to use.

OUR COMMITMENT

We are dedicated to conducting our business in a manner that protects, restores, and preserves the global environment, natural resources, and human health.

We strive to meet this commitment by seeking to:

- Develop and apply methods for minimizing environmental impacts of our operations
- Reduce or eliminate waste and pollutants at every stage of the manufacturing process
- Implement pollution prevention and recycling programs
- Meet or exceed all legal and regulatory environmental requirements
- Integrate responsible environmental practices into our business decisions
- Encourage our business partners and suppliers to share our commitment to the environment

OUR EXPECTATIONS

You are expected to:

- Take immediate steps to report and remedy any situations that present environmental concerns
- Understand and comply with all CoorsTek EHS policies and procedures that apply to you
- Understand and comply with all environmental laws or regulations that apply to you
- Contact the CoorsTek EHS Department for guidance if you have any questions or concerns about any CoorsTek EHS policies and procedures and environmental laws or regulations

What If?

Q: I think a piece of equipment has a design flaw that may cause it to leak fluids that can harm the environment. What should I do?

A: Whenever you learn of or suspect a flaw that could harm the environment or pose a danger to human health, you must immediately **Share Your Concern**.

Additional Resources

Visit the [Global EHS page](#) on the CoorsTek Intranet to find helpful information regarding our environmental standards, policies, and procedures.

QUALITY

We never compromise the quality of our products and services.

OUR COMMITMENT

We are committed to delivering outstanding quality to our customers by understanding and meeting their requirements on time, every time. The quality of our products and services are fundamental to the reputation of CoorsTek, and every employee works together to DRIVE quality and continuous operational improvements in everything we do.

OUR EXPECTATIONS

Employees must always ensure that all CoorsTek products and services honor our commitment to quality. You are expected to:

- Know and follow all quality standards, policies, and procedures that apply to the products produced or services performed that you work on or have responsibilities for
- Never provide or participate in providing false, misleading or incomplete information to our customers or on any inspection, test, or other quality record
- Comply with all laws, regulations, specifications, test procedures, and contractual requirements applicable to the products produced or services performed that you work on or have responsibilities for
- Contact the CoorsTek Quality Department for guidance if you have any questions or concerns about the applicable laws, regulations, specifications, test procedures, and contractual requirements

What If?

Q: One of the quality tests that we perform on a part is repeated further down the production line. Should we skip this test to speed up production?

A: Skipping a required test is never acceptable. If you have ideas for improving efficiency, then certainly share them. However, unless the process is evaluated and modified, it's critical to complete every step as designed to make sure we always deliver high quality products.

Additional Resources

Visit the [Global Quality page](#) on the CoorsTek Intranet to find policies and procedures and best practices for metrology, process control, structured problem solving, and more.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

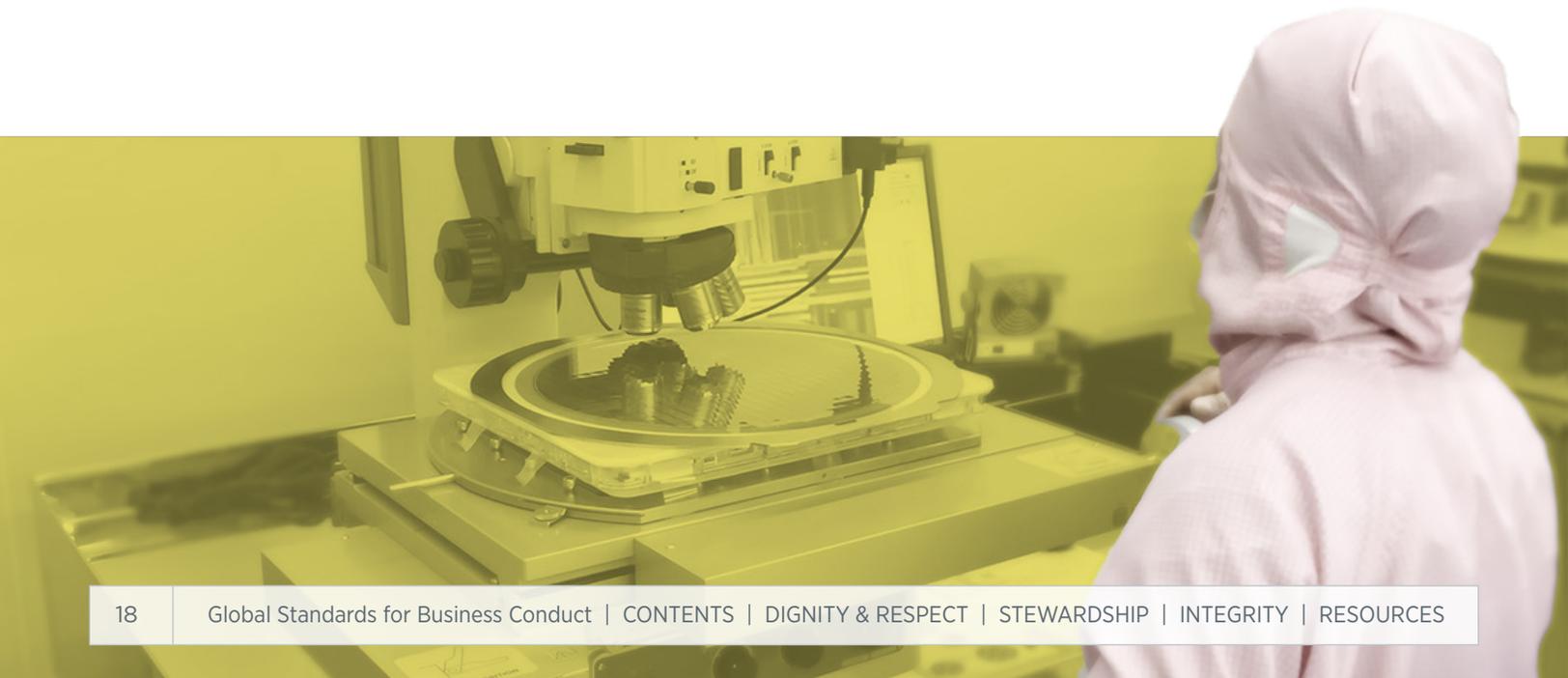
We protect our and our business partners' most valuable and irreplaceable assets.

OUR COMMITMENT

Our confidential information and intellectual property are among our most critical assets. They represent the outcome of significant investment and years of hard work. They also assist us in developing innovative and enabling solutions for our customers and business partners through strategic R&D and materials expertise.

| CONFIDENTIAL INFORMATION | INTELLECTUAL PROPERTY |
|--|--|
| <p>Our confidential information may include:</p> <ul style="list-style-type: none">• Business and marketing plans• Strategies and campaigns• Financial budgets, projections and results• Pricing and sales data• Customer, supplier and employee lists and records• Production methods and procedures• Technical, engineering, and scientific research and development• Other information that is confidential, competitively sensitive, or proprietary | <p>Our intellectual property may include:</p> <ul style="list-style-type: none">• Patents• Trade secrets• Copyrights• Trademarks• Designs, logos, brands• Know-how• Inventions• Processes, capabilities and materials |

To the extent permitted by law, our intellectual property also includes work product created by employees in connection with their duties or while using company resources or information.



OUR EXPECTATIONS

During your employment, you may be exposed to intellectual property or confidential information of CoorsTek, our customers, suppliers or business partners, or another third party. You should:

- Never allow a third party to use our intellectual property without proper authorization and a license agreement approved by the CoorsTek Legal Department
- Promptly disclose any work product created by you, so that it may receive the same protection as other intellectual property of CoorsTek
- Always assume that CoorsTek information is confidential or competitively sensitive, unless you have knowledge that CoorsTek has publicly released the information
- Always take reasonable and necessary precautions to protect any confidential information relating to CoorsTek or another company
- Never disclose any confidential information relating to CoorsTek or another company to anyone outside CoorsTek, unless the disclosure is properly authorized, necessary for a legitimate business purpose, and subject to a written confidentiality agreement approved by the CoorsTek Legal Department
- Only share confidential information within CoorsTek and among your co-workers on a need-to-know basis

What If?

Q: I have been asked to teach a marketing course at a local business school. I believe my students would enjoy discussing how CoorsTek developed several marketing campaigns. May I discuss this work in my class?

A: Only if you first received the approval of the CoorsTek Legal Department. CoorsTek marketing campaigns are a CoorsTek asset developed using company time, resources, and information. Much of this work may include trademarks and other intellectual property of CoorsTek. This work may also include proprietary information about CoorsTek that would not be appropriate to reveal outside the company.

What If?

Q: I received an email from my manager with confidential business information. I know I cannot share this email with anyone outside of the company, but can I share it with a coworker?

A: Not unless your coworker is authorized to see it. You should first ask your manager who you can share the email with, so that you can be sure that you only share confidential business information with employees who are authorized to see it and who have a need to know the information as part of their job duties.

Additional Resources

Visit the [Intellectual Property and Confidential Information page](#) on the CoorsTek Intranet to find guidance regarding CoorsTek intellectual property and confidential information.

COMPANY ASSETS

We are good guardians of our physical, electronic, and information assets.

OUR COMMITMENT

Our company assets are the tools and information we use in our business every day. We endeavor to strategically allocate our company resources, and we entrust our assets to you so that you may successfully perform your work and help accomplish our company's goals.

Our assets include physical property, such as company funds, vehicles, computers, facilities, tools, supplies, equipment, and inventory. They also include intangible assets, such as company time, confidential information, intellectual property, and information systems.

OUR EXPECTATIONS

CoorsTek relies on you to use company assets honestly and efficiently. You are expected to:

- Use company assets only for legitimate business purposes and in the manner they are intended to be used
- Be proactive in protecting company assets from theft, loss, damage, or misuse
- Only conduct financial transactions that have received all required approvals, are properly documented, and comply with our policies

When working with CoorsTek information or technology tools and systems, you must follow all IT security measures and internal controls applicable to the systems you access.

Occasional personal use of company assets such as phones, computers, and email is permitted, but you must ensure that such personal use does not interfere with your work responsibilities and does not violate our policies.

What If?

Q: I have a side business where I design and print wedding invitations and birth announcements. A coworker asked that I design and print the invitation for her upcoming wedding. May I do so?

A: Only if you do so outside of your working hours and you use your own personal computer and equipment. Using CoorsTek computers and equipment, as well as time at work, to design this wedding invitation would be a misuse of CoorsTek assets.

Additional Resources

[IT Acceptable Use Policy](#)

[Global Travel & Expense Policy](#)

Visit [this page](#) on the CoorsTek Intranet to find policies outlining authority levels for signing contracts and approving CoorsTek expenditures.







OUR COMMITMENT TO
INTEGRITY

CONTROLLERSHIP

We are honest, complete, and accurate in our accounting, communications, and decision-making.

ACCURATE BUSINESS AND FINANCIAL RECORDS

OUR COMMITMENT

Reporting accurate, complete, and understandable information about our business, earnings, and financial condition is one of our most important duties. This duty of truthfulness and candor extends to all business records, including books and records, contracts and agreements, business plans and forecasts, inspection and quality reports, and regulatory filings.

We must also ensure that our financial statements comply with all applicable and accepted accounting principles, statutory requirements, our internal control procedures, and our permitted disclosure processes.

OUR EXPECTATIONS

You must ensure our commitment to honesty in our business records by:

- Never falsifying, omitting, misstating, misrepresenting, altering, or concealing any facts or information
- Never encouraging or allowing anyone to compromise the accuracy or integrity of our business records
- Maintaining accurate books and records that fully, fairly, and correctly reflect CoorsTek's financial information
- Fully cooperating with our internal and external auditors and not concealing any information from them
- Ensuring all financial transactions do not include incorrect dates, misleading descriptions, or recording errors, such as false expenses or purchase orders, inaccurate time sheets, or misleading travel and entertainment expenses
- Not tolerating the use of any off-book accounting, unrecorded bank accounts, slush funds, or any other devices that distort our true financial information

What If?

Q: An inspection report shows that a part we made has a defect and doesn't meet the customer's requirements. I saw a quality manager change an inspection report to show that the part does meet those requirements. The change was minor, will not affect the product's performance, and the customer may never notice. Do I need to do anything?

A: Yes. You should **Share Your Concern** immediately. Even minor changes could be considered falsifying records and would violate our commitment to our customer.

STATEMENTS ON BEHALF OF COORSTEK

OUR COMMITMENT

CoorsTek strives to ensure that accurate and complete information is conveyed to the public, to business partners, to regulatory authorities, and to all others. As a result, we have designated certain individuals to serve as our official company spokespersons.

OUR EXPECTATIONS

Unless you are authorized to do so, you must never make any public statements on behalf of CoorsTek. Instead, you must direct all requests for information to the CoorsTek Corporate Communications Department.

Similarly, when using personal social media or interacting online, you should:

- Clearly state that any opinions you express about CoorsTek are your own and do not reflect those of CoorsTek
- Not disclose any confidential business information about CoorsTek or our customers, suppliers and other business partners

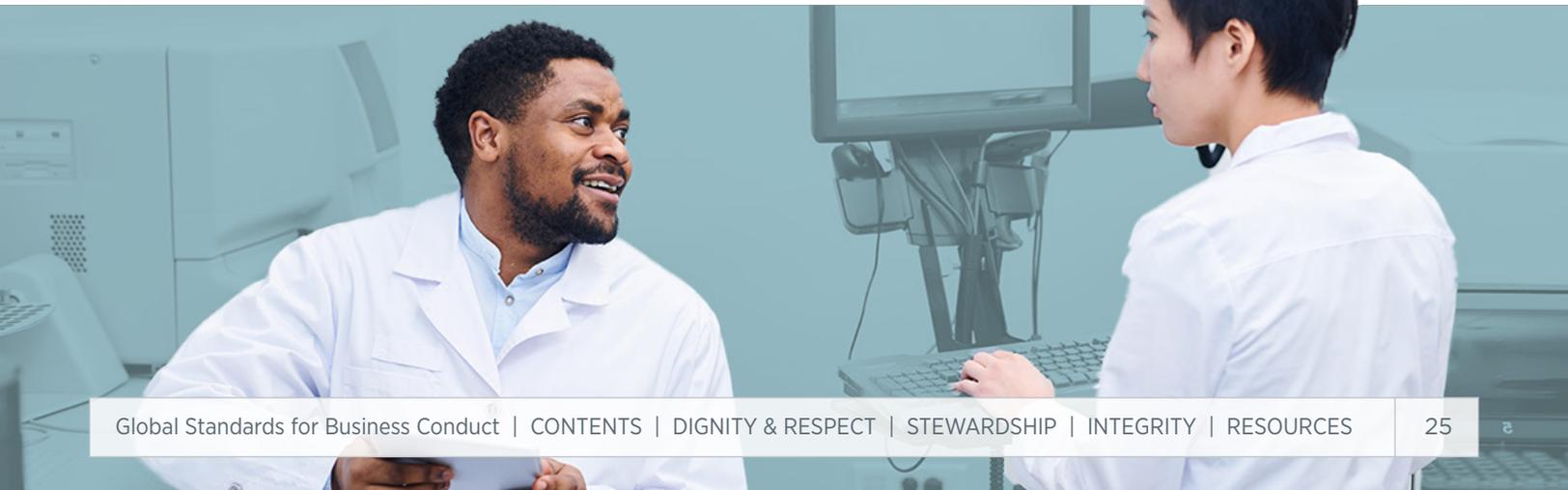
What If?

Q: I saw an online review that is critical of CoorsTek and contains inaccurate information about our company. I know the facts and want to set the record straight. Is it okay to post a response online?

A: No. Unless you are an authorized spokesperson, you should notify the Corporate Communications Department and let an authorized spokesperson address the situation.

Additional Resources

[Social & Electronic Media Policy](#)



CONFLICTS OF INTEREST

We always act in the best interests of our company.

OUR COMMITMENT

We believe in making impartial decisions that deliver the best results for our company. A “conflict of interest” arises when you could use your position at CoorsTek for personal gain or you have a personal relationship or interest that could influence your ability to objectively perform your job.

For example, a conflict may arise when you are:

- Supervising or conducting company business with a family member or someone with whom you have a close personal relationship
- Allowing a second job or commitment take away the loyalty, time, energy, or talent you bring to your position at CoorsTek
- Taking for yourself a business opportunity that is meant for CoorsTek
- Owning, investing in, working for, or advising a company that competes, does business with, or wants to do business with CoorsTek
- Using the CoorsTek name, property, or information without approval to support a charitable, professional, or community organization.

OUR EXPECTATIONS

Even the appearance of a conflict of interest can put you and our company at risk. If you find yourself in a potential or actual conflict of interest, you must immediately Share Your Concern.

A conflict of interest is not necessarily a problem but could become a problem if it is not disclosed and properly managed. Many times, conflicts can be resolved by an open and honest discussion and by working together to find an appropriate solution.

What If?

Q: We require a financial consultant to advise on an important project. My uncle has the perfect skill set for the job and is one of only a few consultants with the required technical expertise for this job. His fees are reasonable. Can I appoint him?

A: Although your uncle meets the requirements for the job, the perception of a conflict of interest may be an issue. Raise this with your supervisor who will make an impartial decision bearing in mind all the circumstances.

GIFTS AND ENTERTAINMENT

OUR COMMITMENT

Conflicts of interest may also arise if you give or accept gifts, entertainment, or other items of value to or from suppliers, customers, competitors or others doing or seeking to do business with CoorsTek.

Giving or accepting an occasional gift, entertainment, or other item of value is often viewed as a normal and important part of developing business relationships. However, giving or accepting them will become inappropriate when they create a sense of obligation or compromise your professional judgment.

OUR EXPECTATIONS

When dealing with **non-government parties**, you should only give and accept gifts, entertainment, or other items of value when they are:

- Modest or of nominal value,
- Infrequent,
- Not cash, loans, or cash equivalents,
- Not going to influence business decisions, and
- Consistent with cultural norms and local laws and regulations.

Gifts, entertainment, or other items of value are of modest or of nominal value if their value is less than US\$250 (or the local currency equivalent). You should not offer or accept a gift, entertainment, or other item of value in excess of \$250 (or the local currency equivalent), unless you have first disclosed the item and its value to your supervisor and the CoorsTek HR Department and received their written approval.

When dealing with **government parties**, you should never give or accept any gifts, entertainment, or other items of value whatsoever, unless you have permission from a member of the CoorsTek Executive Leadership Team or the CoorsTek Legal Department.

What If?

Q: At trade shows and face-to-face customer meetings, I frequently give notepads, pens, and other items that have CoorsTek's logo on them. Is this ok?

A: Yes. You may give culturally appropriate gifts that are promotional in nature and have a nominal value.

RELATIONSHIPS WITH VENDORS

OUR COMMITMENT

We also avoid conflicts of interest by managing our vendor relationships in a fair, equitable, and transparent manner. We make decisions to engage a vendor based on objective criteria, such as quality, reliability, technical excellence, price, reputation, integrity, and compliance with contractual requirements, laws, and our policies.

OUR EXPECTATIONS

When making a purchasing decision on behalf of CoorsTek, you must:

- Choose the vendor based on objective criteria
- Follow all purchasing processes and systems of CoorsTek
- Practice appropriate vendor due diligence
- Never accept gifts or entertainment beyond what is permitted under the Gifts and Entertainment portion of our Global Standards
- Never base your decision on personal relationships or the opportunity for personal financial gain

What If?

Q: I am responsible for selecting a new supplier, and one supplier I am considering offered me expensive luxury box tickets to a sold-out major sporting event. May I accept this?

A: In this situation, your personal interest in receiving the tickets conflicts – or at least appears to conflict – with your responsibility to select the best vendor for CoorsTek. You should consult with your supervisor, the CoorsTek HR Department, or the CoorsTek Legal Department before accepting the tickets. It may be okay to accept these tickets if they are offered infrequently, their cost is not overly lavish, the supplier will be joining you, and the supplier is not expecting favorable treatment in return.

INSIDER TRADING

We recognize that trading on “inside” information is dishonest, unfair, and unlawful.

OUR COMMITMENT

While working at CoorsTek, you may have access to material, nonpublic information about CoorsTek or its suppliers, customers, competitors, or other third parties. This information is known as “inside” information and it may include, for example:

- Budgets, forecasts, and financial results
- Potential significant business deals or transactions
- Changes in executive leadership
- New products or projects

Trading securities of a company while in possession of inside information is illegal and destroys the trust CoorsTek has built with its business partners. We do not permit anyone to share or trade based on inside information of a company.

OUR EXPECTATIONS

If you have access to inside information, we expect that you:

- Never trade or invest based on it until after it has been made public
- Not engage in “tipping” by sharing it with family, friends, or third parties who may use it to make an investment decision
- Exercise caution and avoid the appearance of anything improper

What If?

Q: I learned some information in a meeting with one of our suppliers that could affect some investments my parents are considering. Can I share what I know with them since I will not be trading?

A: No. The law not only prohibits you from buying or selling investments based on inside information, it also prohibits you from tipping off anyone else who may benefit from using that information in a trade.

INTERNATIONAL TRADE AND CUSTOMS

We comply with all export control, economic sanctions, and customs laws.

OUR COMMITMENT

We are proud to be a global company conducting business around the world. As a global company, it is critical that we know and follow the international trade laws that regulate where and with whom we may do business.

These laws vary widely around the world and can change frequently and on short notice. Failure to comply with these laws can seriously impact our business and reputation, lead to significant fines, and result in the loss of our export privileges.

OUR EXPECTATIONS

If you are involved in the movement or deemed export of products, services, information, or technology across international borders, you must:

- Comply with all our Trade Compliance policies and all applicable country laws, regulations, and requirements
- Ensure anything you intend to import or export is classified correctly based on the country of origin, the destination, the end use, and the end user and includes all required documentation, labels, licenses, permits, and approvals
- Verify that your transactions do not involve restricted or sanctioned countries, regions, individuals, or entities
- Contact the CoorsTek Trade Compliance Department for guidance if you have any questions or concerns about the laws or regulations that apply to your transactions

What If?

Q: A potential customer has recommended that we make a new part that will be a profitable, long-term business opportunity for CoorsTek. The customer will not complete an End User Customer Profile and refuses to identify the end-use for the part. I suspect the end-customer is located in a country subject to economic sanctions. What should I do?

A: You should contact the Trade Compliance Department or **Share Your Concern**. We may not be permitted to sell to someone if we know or have reason to know the parts are intended for a sanctioned country.

Additional Resources

Visit the [International Trade and Customs page](#) on the CoorsTek Intranet to find our Global Trade Compliance Policy Statement, our Export-Controlled Technology Transfer Policy, and other policies and procedures related to international trade and customs.

FAIR COMPETITION

We compete vigorously, but fairly.

ANTITRUST

OUR COMMITMENT

We believe in putting good products and services into the marketplace and letting free, fair, and open competition drive our success or failure. We succeed based on our own merits and avoid any conduct that could restrict free trade.

Antitrust and competition laws promote fair competition, and we comply fully with all such laws. Violations of antitrust or competition laws may result in severe legal penalties for our company and criminal charges for the individuals involved.

OUR EXPECTATIONS

You have a responsibility to understand local antitrust and competition laws and, where necessary, consult the CoorsTek Legal Department for guidance.

You may from time to time have conversations with competitors, such as at a trade show or trade association meeting. You must exercise caution when interacting with competitors and follow these rules:

- Do not discuss prices, pricing policies, costs, marketing or strategic plans, technology improvements, or proprietary or confidential information
- Do not make any agreement or understanding to:
 - Raise, set or hold (“fix”) prices on products or services
 - Divide territories, customers or markets
 - Prevent another company from entering the market
 - Refuse to deal with a customer or supplier
 - Interfere with a competitive bid process (“bid rigging”)
 - Restrict production, sales or output

What If?

Q: I ran into an old college friend at a trade show who works for one of our competitors. She asked me how business was going. How should I respond?

A: There are no concerns with responding in a general, non-specific way to say that business is going great. However, keep your conversation high-level. Simply having a conversation with a competitor about our business can give the appearance of an improper relationship between our company and the competitor.

COMPETITIVE INTELLIGENCE

OUR COMMITMENT

In the normal course of business, we acquire information about our competitors, but we do so honestly and lawfully. We recognize that using dishonest, illicit, or illegal methods to acquire another company's trade secrets or other confidential information is wrong.

OUR EXPECTATIONS

With respect to information about our competitors, you are expected to:

- Always respect the confidential information and intellectual property rights of our competitors
- Only seek to gather competitive information from publicly available sources, such as media reports, trade journals, annual reports, government filings, public speeches of company executives, and customers when freely provided to meet a competitive offer
- Never gather competitive information through dishonest, illicit or illegal activity, such as theft, trespassing, eavesdropping, computer hacking, misrepresentation, or hiring a competitor's employee just to obtain the competitor's confidential information

What If?

Q: We just hired someone who used to work for one of our competitors. Can I ask her about some of the secret new products her company was developing before she left?

A: No. It is not appropriate to ask former employees of competitors to disclose confidential business information of that competitor. We have a responsibility to gather competitive information through sources that do not have an obligation of confidentiality to the competitor.

TRUTH IN SALES AND MARKETING

OUR COMMITMENT

Another part of acting honestly and lawfully in our marketplace is giving customers only accurate and truthful information about the quality, features, and availability of our products and our competitors' products.

OUR EXPECTATIONS

When speaking with customers, you should never:

- Use misleading statements in our marketing
- Make claims about our products or services that have not been substantiated
- Make disparaging remarks about our competitors

What If?

Q: I attended a customer meeting with another CoorsTek employee, and I think he intentionally and unreasonably exaggerated our capabilities. What should I do?

A: If possible, you should correct the error during your customer meeting. If that is not possible, you should raise the issue with the employee or **Share Your Concern** to ensure that the error is corrected and the customer does not have a false perception of our capabilities.

ANTI-CORRUPTION AND ANTI-BRIBERY

We earn business based on the quality of our products and services.

OUR COMMITMENT

We know that bribery and corruption not only harm CoorsTek and our customers, but also the communities where we do business. When business decisions are influenced through improper payments, rather than through transparent and fair proposals, resources are not efficiently allocated and low quality products and services at artificially high prices enter the market.

This is why we strictly prohibit any form of bribe, kickback, illegal payment, extortion or other corrupt arrangement with customers, suppliers, government officials, and other third parties.

OUR EXPECTATIONS

GOVERNMENT OFFICIALS

You must never offer or pay a bribe to a government official.

| BRIBE | GOVERNMENT OFFICIAL |
|--|---|
| <p>A “bribe” is anything of value given for the purpose of influencing a discretionary decision, such as encouraging a decision to obtain or retain a government contract, influencing the outcome of a government audit or inspection, or impacting tax or other legislation. A bribe does not need to be a cash payment – it can also include gifts, entertainment, donations, offers of employment, and anything else of value, regardless of the amount, given with the purpose of influencing a decision.</p> | <p>A “government official” is a person who works for or is an agent for a government, a government owned entity, or a government controlled entity, such as:</p> <ul style="list-style-type: none">• Government and regulatory agency employees• Candidates for political office, political parties or officials of political parties• Elected or local officials• Members of law enforcement, including military and local police• Representatives or employees of public international organizations (e.g. United Nations) or charities (e.g. UNICEF)• Relatives of any of the above |

You must also never allow an external party, such as a sales representative, to offer or pay a bribe to a government official on our behalf. CoorsTek and its employees may be held responsible for bribes paid by external parties working for us, and so particular care must be taken not to engage any external party that is suspected of attempting to bribe a government official.

You should also never make a facilitation payment to a government officials. A “facilitation payment” is a small payment to an individual government official to secure or speed up a routine, non-discretionary government action, such as obtaining ordinary licenses or customs clearances.

If you find yourself in a situation where your or another person’s immediate personal safety is in danger and a facilitation payment can assure your safety, then you should make this payment, but it must be reported immediately to the CoorsTek Legal Department.

What If?

Q: An employee at one of our government customers asked if I can help his daughter get a position at CoorsTek. Should I help her?

A: You can provide this government employee information about the positions available at CoorsTek and how to apply for them as all other candidates do. Doing anything more than that could give the appearance of giving a bribe to the government employee.

COMMERCIAL BRIBERY AND KICKBACKS

Some countries, such as the U.K., also prohibit bribes to or from anyone, not just government officials. To ensure compliance with these commercial bribery laws, as well, you should:

- Never solicit or accept a bribe or kickback from any customer, supplier, or anyone who does or is seeking to do business with CoorsTek
- Never offer or give a bribe or kickback to any customer, supplier, or anyone who does or is seeking to do business with CoorsTek
- Always refer to Gifts & Entertainment under the Conflicts of Interest section of our Global Standards when interacting with any commercial partners of CoorsTek

WORKING WITH GOVERNMENTS

We act transparently and lawfully when interacting with governments.

OUR COMMITMENT

CoorsTek engages with international bodies, governments, and government officials at multiple levels and in a variety of ways, such as:

- As a supplier providing products and services
- As a corporate citizen and taxpayer petitioning to protect our interests
- As a private sector participant providing jobs and economic opportunities in cities and countries around the world

When interacting with government officials, we act in an honest, accurate, and transparent manner, and follow all CoorsTek policies and procedures and all applicable laws.

OUR EXPECTATIONS

GOVERNMENT CONTRACTING

Many countries place strict requirements on companies that do business with the government. When selling to, negotiating with or working with government customers, it is critical that you abide by these requirements. Business practices that are acceptable in the commercial arena, such as providing gifts or entertainment, may be unacceptable or illegal in government business.

In addition, through our work with governments, CoorsTek may be entrusted with information and materials that are essential to a country's national security and that are classified as requiring strict protection against unauthorized disclosure.

If your work involves government contracts, you must know and follow all particular rules that apply to your work.

For additional information, you must contact the CoorsTek Legal Department.

LOBBYING

As a corporate citizen, CoorsTek may take a position on issues of public policy that could impact our business and may engage in efforts to affect legislation or government policy. However, because regulations on lobbying activities vary around the globe, only certain individuals authorized by CoorsTek may lobby on behalf of CoorsTek.

You must not contact a government official to try to influence legislation or government policy on behalf of CoorsTek unless your efforts have been approved by an appropriate member of the CoorsTek Executive Leadership Team.

POLITICAL ACTIVITIES AND CONTRIBUTIONS

You should never participate in, authorize, or give any political contributions on behalf of CoorsTek or for the benefit of CoorsTek.

We recognize your right to participate in the political process as an individual, such as support of and donations to local candidates. However, you may only participate on your own time and at your own expense. You must never use the name, funds, facilities, or assets of CoorsTek for political purposes or contributions.

What If?

Q: My friend is running for political office, and I would like to help with the campaign. Is this allowed?

A: Yes. Your personal political activity is your business. But, you should make sure that you do not use CoorsTek resources, including CoorsTek time, e-mail, or name, to support the campaign.

HELPFUL RESOURCES

Thank you for taking the time to read our Global Standards for Business Conduct and for committing to help preserve our reputation and honor The CoorsTek Way.

The policies referenced in our Global Standards will provide you with additional guidance when you are faced with a new or difficult situation.

The following table also identifies internal resources at CoorsTek that are available to you to answer your questions or to talk through a problem.

| Resource: | For Help With: | Contact Info: |
|--|---|---|
| CoorsTek Legal Department | Concerns or questions about our Global Standards, our policies, or a law or regulation. | legal@coorstek.com |
| CoorsTek EHS Department | Concerns or questions about workplace health or safety or environmental matters. | EHSEmployeeComplaint@coorstek.com |
| CoorsTek Corporate Communications | Concerns or questions about media requests, public statements, or other communication issues. | CorporateCommunications@coorstek.com |
| CoorsTek Trade Compliance Department | Concerns or questions about import, export, and other trade or customs related issues. | TradeCompliance@coorstek.com |
| CoorsTek HR Department | Concerns or questions about employee matters. | Your local HR business partner or representative. |
| CoorsTek Quality Department | Concerns or questions about issues that may affect the integrity of our products or services. | quality@coorstek.com |
| CoorsTek IT Department | Concerns or questions about issues related to use of company IT resources. | ITHelpDesk@coorstek.com |
| CoorsTek Government Affairs Department | Concerns or questions about any government related matters. | legal@coorstek.com |



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