

# **GRAHAM CORPORATION**

## **GLOBAL HUMAN RIGHTS POLICY**

**ADOPTED: May 30, 2023**

### **Introduction**

This Global Human Rights Policy applies to the employees, officers and directors of Graham Corporation as well as those individuals or entities with which Graham directly or indirectly conducts business. Those who violate this Policy may be subject to disciplinary action, which could include termination of employment or the business relationship with Graham.

### **Our Commitment**

We recognize that we have the opportunity to create a better world and protect those people with whom our business comes into contact. We are committed to conducting our business in an ethical and responsible manner. We seek to operate in compliance with all applicable laws wherever we do business.

We believe it is our responsibility to respect human rights in our operations, including, among other things, opposing human trafficking and the exploitation of children.

We are committed to fostering safe, inclusive and respectful workplaces. We will not use forced, bonded, or child labor, or other similarly exploitative practices, or purchase materials that were knowingly produced with such labor.

We expect that our business partners also treat workers fairly and do not engage in human rights abuses.

In furtherance of our goal of creating a better world and protecting those people with whom our business comes into contact we have established this Policy.

### **Health & Safety**

We strive to provide our employees with a safe and healthy work environment. Those subject to this Policy are responsible for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices, or conditions. Violence and threatening behavior are not permitted.

### **Labor**

We will not tolerate the use of forced or involuntary labor, slave labor, child labor, or human trafficking and will comply with all applicable labor laws with regards to working conditions, wages, working hours, overtime hours, hiring, and benefits.

### **Diversity**

We believe the diversity of our employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination or harassment of any kind. This includes but is not limited to discrimination or harassment based on race, color,

religion, sex, national origin, age, disability, sexual orientation, gender identity or any other status protected by applicable laws, rules or regulations.

### **Community**

We are committed to good corporate citizenship within the communities and countries in which we operate and will work to develop good relationships within, and positively impact, these communities. We expect our employees, supply chain and business partners to respect the culture, values and customs of the locations where we conduct business.

### **Suppliers**

We expect our vendors, suppliers and other business partners to maintain a similar approach to human rights as outlined in this Policy.

### **Administration of the Policy**

This Policy is administered internally by our senior management and those subject to this Policy are encouraged to talk to supervisors, managers, or other appropriate personnel about any observed behavior that is in violation of this Policy. We do not to allow retaliation for good faith reports of misconduct.